

Privacy Policy

PURPOSE

This policy outlines how Trainwest collects, uses, discloses, and manages personal information to ensure compliance with relevant legislation and standards.

Trainwest is committed to protecting the privacy and confidentiality of personal information in compliance with:

- *National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025*
- *National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025*
- *National Vocational Education and Training Regulator Act 2011*
- *Privacy Act 1988*
- *Australian Privacy Principles*
- *Data Provision Requirements 2020*
- *National VET Data Policy.*

SCOPE

This policy applies to all Trainwest employees and third-party partners operating under a third-party arrangement.

RESPONSIBILITIES

Chief Executive Officer (CEO) and General Managers	<ul style="list-style-type: none"> • Oversee the development, implementation and maintenance of privacy practices. • Ensure compliance with privacy legislation and regulations. • Ensure all students are informed of the National VET Data Policy prior to enrolment.
Employees	<ul style="list-style-type: none"> • Comply with privacy laws, policies, and procedures. • Safeguard the privacy and confidentiality of personal information. • Report any privacy breaches or concerns to the General Managers.
Third-Party Partners	<ul style="list-style-type: none"> • Ensure compliance with privacy legislation and regulations. • Ensure all students are informed of this policy and the National VET Data Policy prior to enrolment.

Policy Statement

Trainwest takes the privacy of our students seriously and complies with all legislative requirements, ensuring that the collection of information is fair, lawful, unobtrusive and necessary for the organisational functions.

We ensure all students and employees are informed of the purpose of collecting information, how it is used, and how they can access their personal information held by Trainwest.

Student Information

Students' personal information is collected for enrolment purposes, and assessment records are recorded as per the [National Vocational Education and Training Regulator \(Outcome Standards for NVR Registered Training Organisations\) Instrument 2025](#) (the Standards).

Use of student information

- Trainwest is required to collect personal information that is necessary for enrolment into nationally accredited and non-accredited training courses
- This information is required by law to be collected, held, used, and supplied in accordance with the National VET Provider Collection Data Provision Requirements
- Trainwest provides student information to training team members on a need-to-know basis.
- Trainwest uses information collected for the express purpose for which it is collected unless prior consent is obtained from the student
- Trainwest ensures the accuracy of information provided, confirmed through the Student Agreement on the first day of attendance to the course
- Trainwest does not use personal details in direct marketing without obtaining prior written permission from the person concerned
- Students are asked to provide consent prior to any photographs or video evidence being captured for marketing purposes
- Students are asked to provide consent to release or discuss course progress with their employer
- Trainwest will not release any personal information to a third-party without the written consent of the student unless required by law.

Storage and security of information

Trainwest takes all reasonable steps to protect personal information against misuse, loss, and unauthorised access by implementing the following measures:

- Securing all files in secure physical and electronic locations
- Restricting access to information to relevant team members only
- Destroying information securely after the required retention period
- Ensuring robust computer security, including firewalls, up-to-date antivirus software, password security, encryption of sensitive data, and file permissions
- Regularly updating cyber security protocols and systems to protect against hacking, data breaches, malware, and other cyber threats
- Implementing multi-factor authentication (MFA) for critical systems to enhance security
- Conducting regular IT security audits and testing to identify and address vulnerabilities
- Having cyber security insurance in place to protect against potential financial and reputational damages caused by cyber incidents
- Notifying relevant government bodies and affected individuals as per the [Notifiable Data Breach Scheme](#) in the event of a data breach.

Refer to the Records Keeping Policy for more information.

Access to your performance information

Trainwest provides access to students' personal information upon request for updating or correction. If students wish to access their student information, they are to direct their inquiry to admin@trainwest.com.au.

Disclosure of your information

Trainwest is required by law under the *National Vocational Education and Training Regulator Act 2011* (Cth) (NVETR Act) to disclose personal information to the National VET Data Collection maintained by the National Centre for Vocational Education Research Ltd (NCVER). The NCVER is responsible for collecting, managing, analysing, and communicating research and statistics about the Australian VET sector.

Trainwest is authorised by law (under the NVETR Act) to disclose personal information to the relevant state or territory authority. From time to time, we may also have to disclose student information due to a court order, subpoena, or warrant, in the course of legal proceedings, or in response to a law enforcement agency request.

Trainwest may provide attendance, progress, and participation information, as well as a copy of the outcome of training results to the following parties:

- Schools if you are a secondary student undertaking VET training as part of a school program
- Employers if you are enrolled in training paid for by your employer
- Regulatory Bodies if you are enrolled in a course regulated by another organisation
- Commonwealth and State or Territory government departments and authorised agencies
- National Centre for Vocational Education Research Ltd (NCVER).

Trainwest will not supply personal information to any other party without authorisation. Students must complete a Disclosure of Details Consent Form for results or other information to be released to any other third-party not listed above.

Trainwest may use students' personal information to provide direct marketing materials, updates, or newsletters related to course enrolments or inquiries. Students are requested to provide media consent and subscribe to marketing emails via the Student Agreement. All other media consent is requested through the Media Consent Form.

Students can unsubscribe from marketing emails at any time by clicking the unsubscribe link or emailing admin@trainwest.com.au with the subject 'Unsubscribe'. From time to time, students may be contacted via email or SMS to confirm or change course bookings.

Trainwest does not, and will not, sell personal information to any other party.

Privacy Notice

Under the NVETR legislation, we must include the below Privacy Notice on our enrolment documents:

Why we collect your personal information

As a registered training organisation (RTO), we collect your personal information so we can process and manage your enrolment in a vocational education and training (VET) course with us.

How we use your personal information

We use your personal information to enable us to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO.

How we disclose your personal information

We are required by law under the *National Vocational Education and Training Regulator Act 2011* (Cth) (NVETR Act) to disclose the personal information we collect about you to the National VET Data Collection kept by the National Centre for Vocational Education Research Ltd (NCVER). The NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector.

We are also authorised by law (under the NVETR Act) to disclose your personal information to the relevant state or territory training authority.

How the NCVER and other bodies handle your personal information

The NCVER will collect, hold, use and disclose your personal information in accordance with the law, including the *Privacy Act 1988* (Cth) (*Privacy Act*) and the NVETR Act. Your personal information may be used and disclosed by NCVER for purposes that include populating authenticated VET transcripts; administration of VET; facilitation of statistics and research relating to education, including surveys and data linkage; and understanding the VET market.

The NCVER is authorised to disclose information to the Australian Government Department of Employment and Workplace Relations (DEWR), Commonwealth authorities, State and Territory authorities (other than registered training organisations) that deal with matters relating to VET and VET regulators for the purposes of those bodies, including to enable:

- administration of VET, including program administration, regulation, monitoring and evaluation
- facilitation of statistics and research relating to education, including surveys and data linkage
- understanding how the VET market operates, for policy, workforce planning and consumer information.

The NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf.

The NCVER does not intend to disclose your personal information to any overseas recipients.

For more information about how the NCVER will handle your personal information please refer to the NCVER's Privacy Policy at ncver.edu.au/privacy.

If you would like to seek access to or correct your information, in the first instance, please contact your RTO using the contact details listed below.

DEWR is authorised by law, including the *Privacy Act* and the NVETR Act, to collect, use and disclose your personal information to fulfil specified functions and activities. For more information about how the DEWR will handle your personal information, please refer to the DEWR VET Privacy Notice at dewr.gov.au/national-vet-data/vet-privacy-notice.

Surveys

You may receive a student survey which may be run by a government department or an NCVER employee, agent, third-party contractor or another authorised agency. Please note you may opt out of the survey at the time of being contacted.

Contact information

At any time, you may contact Trainwest to:

- request access to your personal information
- correct your personal information
- make a complaint about how your personal information has been handled
- ask a question about this Privacy Notice.

Telephone: 1300 938 411

Email: admin@trainest.com.au

Quality Management

Our Quality Management System (QMS) integrates quality control, quality assurance and continuous improvement, demonstrating our commitment to upholding the highest quality standards across all our operations.

This policy undergoes a systematic review during our annual internal audit, as per our Internal Audit Procedure, reinforcing its role in achieving quality objectives and compliance standards. Ongoing review activities are documented as per our Quality Assurance Procedure.

Identified issues and improvements in this process, along with related practices and systems, are recorded in the CI Register as per our Continuous Improvement Procedure. Employees are encouraged to contribute to continual improvement by submitting a CI Request if they identify any issues or improvement opportunities.

DEFINITIONS

Access and Equity	Policies and approaches aimed at ensuring that VET is responsive to the individual needs of clients whose age, gender, cultural or ethnic background, disability, sexuality, language skills, literacy or numeracy level, unemployment, imprisonment or remote location may present a barrier to access, participation and the achievement of suitable outcomes.
Australian Skills Quality Authority (ASQA)	The national regulator for Australia's vocational education and training sector.
Compliance	The state of being or in the process of becoming so, in accordance with established guidelines, legislation, regulations, or specifications within the vocational education and training (VET) industry.
National Centre for Vocational Education Research (NCVER)	The national professional body responsible for collecting, managing, analysing and communicating research and statistics on the Australian Vocational Education and Training (VET) sector.
Registered Training Organisation (RTO)	A training provider registered by a state or national regulatory body, authorised to deliver and assess nationally recognised training in Vocational Education and Training (VET).
Student	Person receiving training and/or assessment services provided by an RTO, or by a third party on their behalf, and includes learners, participants, candidates and trainees.
Third-Party	Any person who has an arrangement with an NVR RTO to deliver services, but does not include: <ul style="list-style-type: none"> • Employees of the organisation • Experts engaged by the organisation • Government agencies and government-funded agencies that refer VET students to the organisation and do not receive any payment from the organisation for doing so.

Refer to our [Glossary](#) for a list of all Trainwest terms and definitions.

RELATED DOCUMENTS

Internal

Policies	Access and Equity Policy Assessment System Policy Code of Conduct Enrolment Policy ICT and Social Media Policy Governance Policy Marketing and Advertising Policy Records Keeping Policy
Procedures	Continuous Improvement Procedure Document Control Procedure Enrolment Procedure Marketing and Advertising Procedure Onboarding and Induction Procedure Recruitment and Selection Procedure Risk Management Procedure
Guides	Employee Handbook Trainwest Student Handbook (website) Trainwest Third-Party Student Handbook (website)
Forms	Disclosure of Details Consent Form Media Consent Form Student Agreement (PowerPro)
Systems	Canvas LMS Cyber Security Insurance PowerPro (Student Management System) Trainwest Intranet Trainwest Website

External

Legislation	National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025 National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025 National Vocational Education and Training Regulator Act 2011 Privacy Act 1988 Australian Privacy Principles Data Provision Requirements 2020 National VET Data Policy Student Identifiers Act 2014 Student Identifiers Regulation 2014 Student Identifiers (Exemptions) Instrument 2021
Compliance	Commerce WA: Privacy and confidentiality of records OAIC: Privacy OAIC: Notifiable Data Breaches scheme