

1. Purpose

Tubal Pty Ltd (RTO# 51679) is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au.

2. Policy Statement

This policy applies to all employees and any other workers such as contractors engaged by the RTO.

This policy should be read in conjunction with:

- Records Management Policy and Procedure
- Enrolment Policy and Procedure
- Financial Management Policy and Procedure

3. Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

In the case of nationally recognised training, much of your information is required to be disclosed to state and government departments such as the NCVER, this information is outlined below.

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4. 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.

It is important to understand that without some of the information, we are unable to accept your enrolment or may be unable to provide you with access to both national and state funding related to your course. Examples: without your USI, we cannot issue you with your qualification, without evidence of you being a citizen or state resident you may not be able to access funded training.

5. 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.

6. How we address the Australian Privacy Principles

The following outlines how we apply each privacy principle:

APP 1	Open and transparent management of personal information	Students have access to their records at any point in time.
APP 2	Anonymity and pseudonymity	A range of feedback mechanisms allow for anonymous feedback to be provided to the RTO.
APP 3	Collection of solicited personal information	A range of information is required for enrolment into courses, more so for government funded courses, this information is held with a protected student management system, Ammonite, and is only provided as required to government under the law.
APP 4	Dealing with unsolicited personal information	Unsolicited information is not provided to government or to any third parties without the authority of the person.
APP 5	Notification of the collection of personal information	Where we have to provide additional information to the government such as correspondence with individuals or otherwise, we will take all reasonable steps to notify the individual.
APP 6	Use or disclosure of personal information	The enrolment form, student information guide and website outline what information is required to be disclosed to the government through AVETMISS, NCVET and/or STA reporting.
APP 7	Direct marketing	The RTO does not use or disclose personal information for the purpose of marketing, where email campaigns and similar are employed, an opt out option is available.
APP 8	Cross-border disclosure of personal information	The RTO does not work with any overseas bodies or entities to which is discloses personal information.

APP 9	Adoption, use or disclosure of government related identifiers	The RTO must collect information on a students Unique Student Identifier and report this in data to the government, information about how your USI is used can be found at https://www.usi.gov.au/
APP 10	Quality of personal information	The RTO takes all reasonable steps to ensure that student data collected is accurate, up to date and complete. Refer to our Records Management Policy and Procedure for more information.
APP 11	Security of personal information	The RTO holds all personal information in a protected student management system, Ammonite for more information about security please refer to https://ammonite.com.au/resources/blog
APP 12	Access to personal information	The RTO is required to hold information about your enrolment for a period of 30 years as required by Schedule 5 of the RTO Standards.
APP 13	Correction of personal information	The RTO takes all reasonable steps to correct personal information where it becomes known.

7. 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.

8. 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 Education, Skills and Employment (DESE), 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

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- 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 www.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.

DESE 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 DESE will handle your personal information, please refer to the DESE VET Privacy Notice at <https://www.desegov.au/national-vet-data/vet-privacy-notice>.

9. How states may handle your information

Please note that if you are undertaking funded training and assessment or participating in training via a traineeship or apprenticeship, the state in which your training contract is registered will also have access to your information. For information about how the state will handle your information, please refer to the notice of registration of your training contract or speak to an RTO representative.

10. Recording of Staff and Students on Site

Purpose of Surveillance

The RTO utilises security surveillance systems, including CCTV cameras, to ensure the safety and security of staff, students, visitors, and assets on-site. The use of these systems aims to:

- Deter and detect unauthorised access, theft, or vandalism.
- Monitor compliance with workplace health and safety (WHS) procedures.
- Investigate incidents or allegations related to misconduct, safety breaches, or criminal activities.
- Support emergency response efforts in the event of an incident.

Use and Access to Footage

Recorded footage is used strictly for security and compliance purposes and may be reviewed in the following circumstances:

- Where an incident, accident, or security breach has occurred or is suspected.
- To comply with legal obligations or regulatory requirements.

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- When requested by law enforcement or other authorised agencies.
- For internal investigations related to misconduct, WHS concerns, or policy breaches.

Only authorised personnel, such as senior management, compliance officers, or designated security staff, have access to recorded footage. All access is logged and monitored to ensure compliance with privacy laws.

Disclosure of Footage

CCTV footage may be shared with:

- Law enforcement agencies where required for an official investigation.
- Regulatory bodies or government authorities where legally obligated.
- Insurance providers in cases of claims or liability investigations.
- Other third parties where disclosure is required by law.

Footage will not be provided to unauthorised individuals or external parties unless legally required or with the consent of the individual(s) recorded.

Retention and Security of Footage

Recorded footage is stored securely and retained for a period of 30 days, unless required for an ongoing investigation or legal proceeding. After this period, footage is permanently deleted, unless retained for legal or compliance reasons.

Security measures are in place to prevent unauthorised access, modification, or disclosure of recorded footage in accordance with the **Privacy Act 1988 (Cth)** and relevant state laws in West Australia.

Rights and Privacy

Individuals who believe they have been recorded may request access to relevant footage, subject to legal and operational constraints. Requests for access should be directed to the CEO, and will be reviewed in line with privacy laws and organisational policies.

For further information about surveillance practices and privacy rights, please refer to the Office of the Australian Information Commissioner (OAIC) website at www.oaic.gov.au.

11. 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.

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12. Data Breach Management

The RTO has a Data Breach Policy in place to manage any potential breaches of personal information. This policy outlines the processes for identifying, containing, and notifying individuals and authorities in accordance with the Notifiable Data Breaches (NDB) scheme under the Privacy Act 1988 (Cth).

In the event of a data breach, affected individuals will be informed where required by law, and appropriate remedial actions will be taken. For more details, please refer to the Data Breach Policy or contact [Insert Contact Information].

13. Collection of Biometric Data

The RTO does not collect, store, or process biometric data (e.g., fingerprint scans, facial recognition, retina scans) for security, attendance tracking, or identification purposes.

If this policy changes in the future, individuals will be notified, and appropriate privacy protections will be implemented in line with Australian Privacy Principles (APPs).

14. Contact information

At any time, you may contact the RTO 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

15. Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party. Sensitive information will only be provided to third parties, outside those as discussed above, with your express consent.

Some personal information may be processed or stored by third-party providers, including cloud-based student management systems, learning platforms, and communication tools. Where such providers store data overseas, we take reasonable steps to ensure that:

- The service provider complies with Australian privacy laws.
- Data protection agreements are in place to safeguard personal information.
- Individuals are informed if their data is stored outside Australia.

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For a list of third-party platforms we use and their data security measures, please contact the CEO.

16. Disclosures and Complaints

The RTO has zero tolerance and provides options for informal disclosure and formal complaints. Complaints will be treated seriously and investigated promptly. All documentation related to the resolution process will be confidential with the principles of natural justice applied.

The RTO expects that all complaints made under this policy will be made in good faith.

Disciplinary procedures may be initiated if a complaint is found to be frivolous or vexatious.

The RTO does not tolerate victimisation of individuals who have taken action under this policy and will take reasonable steps to ensure that affected individuals are not victimised.

In the event that complaints provide evidence of unlawful activity, this information will be provided to the police for full investigation. The RTO will cooperate with any legal investigation fully and in good faith.

17. Security of information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years and in the case of information related to your enrolment and course this information is required to be kept for 30 years in our student management system.

18. Referral to external agencies

In the event that an individual is unsatisfied with the outcome of a complaint and / or investigation, the following bodies can be contacted:

- Australian Skills Quality Authority (ASQA) / Training Accreditation Council (VET Regulator)
- Office of the Australian Information Commission

Information from the OAIC about your privacy rights can be found here <https://www.oaic.gov.au/privacy/your-privacy-rights/>.

19. Policy Review

This policy will be reviewed each year and as a standing item, include details of the date it was reviewed and any changes.

- November 2022 – Initial creation

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- March 2025- Update in line with revised RTO Standards, review of current privacy legislation and APPs

Policy Additions or Amendments

Separate to the mandated annual review, the policy may be varied at any time due to legislative changes or to fall in line with widely accepted best practices in the workplace. In the event of any changes, the policy will be updated, and relevant stakeholders advised.

SUSAN CAYAGO
Director of Tubal Pty Ltd

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