

PRIVACY POLICY

Contents

PRIVACY POLICY	1
1. PURPOSE	1
2. SCOPE	1
3. POLICY STATEMENT	1
4. LEGISLATIVE BASIS FOR PRIVACY MANAGEMENT	2
5. POLICY	3
6. CONTINUOUS IMPROVEMENT	7
7. RISK MANAGEMENT	7
8. POLICY IMPLEMENTATION	7
9. FEEDBACK, COMPLAINTS AND APPEALS	7
10. ACCOUNTABILITY	7
11. MONITORING	8
12. REGULATORY FRAMEWORK	9
13. RELATED DOCUMENTS	10
14. DEFINITIONS	10

1. PURPOSE

This policy outlines how INSCOPE TRAINING PTY LTD collects, uses, stores, and discloses personal information in accordance with the **Privacy Act 1988** (Cth), the **Australian Privacy Principles** (APPs), and other relevant legislation including state or territory training and licencing authorities. Personal information is used solely for enrolment, training, support, and reporting purposes. We respect your privacy and are committed to keeping your information secure and confidential.

2. SCOPE

This policy applies to all employees, students, contractors, and third parties engaged with INSCOPE TRAINING PTY LTD who may collect, access, or manage personal or sensitive information.

3. POLICY STATEMENT

INSCOPE TRAINING PTY LTD is committed to protecting the privacy of individuals by ensuring all personal information is managed in accordance with relevant privacy legislation and other relevant legislation.

- a) The enrolment form provides prospective students with the option to consent to the sharing of progress information with their employer/ school (if applicable). In some cases, we may be legally required or mandated under the National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) (referred to herein as the Outcome Standards) or other relevant legislation to disclose
-

participant information to government agencies or other authorised entities. In such cases, students will be provided with a Privacy Notice during their enrolment.

- b) In all other situations, participant information will not be disclosed without written consent.

4. LEGISLATIVE BASIS FOR PRIVACY MANAGEMENT

- a) INSCOPE TRAINING PTY LTD takes the privacy of its participants very seriously and complies with all legislative requirements, including the **Privacy Act 1988** (Cth) and the **Australian Privacy Principles** (2014).
- b) Information provided during enrolment may be disclosed to employers/schools where consent is granted. However, in some cases, participant data may be disclosed without consent if required by law or under the Outcome Standards for NVR Registered Training Organisations 2025 or other relevant legislation.
- c) The enrolment form allows students to give us permission to discuss their progress and outcomes with their employer/schools (if applicable). In some cases, we will be required by Law or required by the Outcome Standards for NVR Registered Training Organisations 2025 to make student information available to others. They may include:

- Australian Skills Quality Authority
- National Centre for Vocational Education and Research
- Department of Employment and Workplace Relations, Australian Government
- NSW Department of Education, New South Wales Government
- Department of Trade, Employment and Training, Queensland Government
- Workplace Health and Safety Queensland
- Government of Western Australia, Department of Mines, Industry, Regulation and Safety
- SafeWork NSW

In such cases, students will be provided with a Privacy Notice during their enrolment. In all other cases, we ensure that we will seek the written permission of the participant.

- d) The thirteen Privacy Principles are defined below:
- **Principle 1** – Open and transparent management of personal information. The object of this principle is to ensure that INSCOPE TRAINING PTY LTD's entities manage personal information openly and transparently.
 - **Principle 2** – Anonymity and pseudonymity. Individuals may have the option of not identifying themselves or using a pseudonym when dealing with INSCOPE TRAINING PTY LTD in relation to a matter.
 - **Principle 3** – Collection of solicited Personal Information. INSCOPE TRAINING PTY LTD must not collect personal information (other than sensitive information) unless the information is reasonably necessary for INSCOPE TRAINING PTY LTD's business purposes.
 - **Principle 4** – Dealing with unsolicited personal information. If INSCOPE TRAINING PTY LTD receives personal information, INSCOPE TRAINING PTY LTD must, within a reasonable period after receiving this information, determine whether or not we would have collected the information under Australian Privacy Principle 3, and if not, we must, as soon as practicable but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified.

- **Principle 5** – Notification of the collection of personal information. Requires INSCOPE TRAINING PTY LTD to notify our clients, staff, and participants of any additional information we collect about them and further advise them of how we will deal with and manage this information.
- **Principle 6** – Use or disclosure of personal information. The information that INSCOPE TRAINING PTY LTD holds on an individual that was collected for a particular purpose INSCOPE TRAINING PTY LTD must not use or disclose the information for another purpose unless the individual has consented.
- **Principle 7** – Direct marketing. As INSCOPE TRAINING PTY LTD holds personal information about individuals, we must not use or disclose the information for the purpose of direct marketing.
- **Principle 8** – Cross Border disclosure of personal information. Where INSCOPE TRAINING PTY LTD discloses personal information about an individual to an overseas recipient, INSCOPE TRAINING PTY LTD must take all steps to ensure that the overseas recipient does not breach the Australian Privacy Principles.
- **Principle 9** – Adoption, use or disclosure of government related identifiers. INSCOPE TRAINING PTY LTD must not adopt a Government-related identifier of an individual as its own identifier of the individual, except when using identification codes or numbers issued by either the State based regulators, or the Department of Innovation with regard to the Unique Student Identifier.
- **Principle 10** – Quality of personal information. INSCOPE TRAINING PTY LTD must take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that INSCOPE TRAINING PTY LTD collects is accurate, up to date and complete.
- **Principle 11** – Security of personal information. If an APP entity holds personal information, the entity must take such steps as are reasonable in the circumstances to protect the information.
- **Principle 12** – Access to personal information. As INSCOPE TRAINING PTY LTD holds personal information about an individual, INSCOPE TRAINING PTY LTD must, on request by the individual, give the individual access to the information.
- **Principle 13** – Correction of personal information. As INSCOPE TRAINING PTY LTD holds personal information about individuals and should we believe that this information is inaccurate, out of date, incomplete, irrelevant, or misleading; or the individual requests the entity to correct the information; INSCOPE TRAINING PTY LTD must take such steps as are reasonable in the circumstances to correct that information.

5. POLICY

5.1 WHAT IS PERSONAL INFORMATION

Personal information relevant to INSCOPE TRAINING PTY LTD might include the student's and employers:

- Name
- Unique Student Identifier Number (USI)
- Address
- Gender
- Residential, Citizenship and Indigenous status
- Telephone numbers and email address

- Drivers licence number/Passport number
- Assessment results
- File notes
- Bank and Credit Card details
- Signature
- Date of Birth
- Medical records
- Photos and videos
- IP address
- Opinions which can be used to identify them

5.2 HOW AND WHY WE COLLECT YOUR PERSONAL INFORMATION

- a) 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, check eligibility for funded training, issue GCIT Cards (if applicable) and notify relevant State and Territory Training and Licencing Authorities of your results. We collect this information through our enrolment process.
- b) We also review personal information in the State Training Authorities (STA) Portal as per the Skilled Assure Supplier Agreement and Smart and Skilled Agreement.
- c) Where you choose to send us a completed electronic contact form (via our website) that includes your email address, we will not add your email to our subscription services unless you have provided it to us for that reason.
- d) The information collected by email or electronic forms will be used only for the purpose for which you provided it, and we will not disclose it unless one of the circumstances described below under the heading “How we disclose your personal information”.
- e) Our website uses cookies. This is a small file containing a string of characters to your computer that uniquely identifies your browser. It is information that your web browser sends back to our website server whenever you visit it again. We use cookies to ‘remember’ your browser between page visits. In this situation, if you log into the website (www.inscope.edu.au) the cookie will store your user credentials.
- f) When you access INSCOPE TRAINING PTY LTD online services, the website (www.inscope.edu.au) servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your server address, your top level domain name (for example, .com, .gov, .au, .uk, etc), the date and time of visit to the site, the pages accessed and documents viewed, the previous sites visited, and the browser type, browser language, and one or more cookies that may uniquely identify your browser.

5.3 HOW WE USE YOUR PERSONAL INFORMATION

- a) We use your personal information to enable us and any third parties we use to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO. INSCOPE TRAINING PTY LTD staff and third parties do not access, use or disclose personal information other than in the performance of their duties.

- b) We will not use your email or phone number to send unsolicited promotions or newsletters unless you have provided us permission. Where permission has been granted by you to receive these, we will provide an unsubscribe/ OPT out option.

5.4 HOW WE STORE YOUR PERSONAL INFORMATION

- a) INSCOPE TRAINING PTY LTD takes all reasonable steps to protect private information from misuse, loss, unauthorised access, modification, or disclosure including restricted access to electronic files, secure storage of paper files, and backup of data. Personal information collected is stored in Australia

5.5 HOW WE DISCLOSE YOUR PERSONAL INFORMATION

- a) In some cases, we are required by law (under the National Vocational Education and Training Regulator Act 2011 (referred to herein as the NVR 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. For government funded training this information is submitted monthly by us through the relevant State Training Authorities (STA's) portals. Activity that has not been reported to an STA is reported annually through the NCVER Portal.
- b) In some cases, we are also authorised by law (under the NVR Act) to disclose your personal information to the relevant state or territory training or licencing authority.
- c) Prior to personal information of Queensland students being transferred outside of Australia, INSCOPE TRAINING PTY LTD will request written consent from the relevant Queensland Training or Licencing Authority and where consent is given, ensure that any such transfer complies with Section 33 of the Information Privacy Act 2009 (QLD)(transfer of personal information outside Australia).

5.6 CONSENT

- a) Consent for the collection and disclosure of Student Personal Information will include wording prescribed by the **Privacy Act 1988** (Cth) (Privacy Act) and the **NVETR Act**, as well as any additional requirements under State training or licencing authority.
- b) Before collection of Student Personal Information to proceed with the Notification of Enrolment process for students training funded under NSW Government Smart and Skilled Contract, INSCOPE TRAINING PTY LTD will first obtain consent of the student by asking the student to sign (and guardian if under the age of 18) a consent form (using the same wording as the privacy consent statement in the Operating Guidelines) and store evidence of this consent in the Student Records.
- c) We will also request consent for the collection of personal information for promotional purposes. You can choose to receive or not receive and can opt out any time by contacting us.

5.7 HOW NCVER AND OTHER BODIES HANDLE YOUR PERSONAL INFORMATION

- a) 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.

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.

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

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

For more information about how NCVER will handle your personal information, please refer to 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.

- DEWR is authorised by law, including the **Privacy Act** and the **NVR 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 <https://www.dewr.gov.au/national-vet-data/resources/national-vet-data-policy>.
- State or Territory governments or agencies are authorised by law, including the **Privacy Act** and the **NVR Act**, to collect, use and disclose your personal information to fulfil specified functions and activities including providing funding for training and licencing requirements.

5.8 SURVEYS

You may receive a student survey which may be run by INSCOPE TRAINING PTY LETD, 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.

5.9 NATIONAL VOCATIONAL EDUCATION AND TRAINING ACTS 2011

- These three acts are named in the legislative listing and define the acts of Federal Parliament that empower ASQA to administer the operations and compliance of RTOs in most states of Australia and any RTOs that operate in more than one State in Australia.
- This includes the right of ASQA to audit INSCOPE TRAINING PTY LTD, apply penalties for non-compliance and define the requirements to retain records and other administrative and operational requirements of a functioning RTO.
- INSCOPE TRAINING PTY LTD is answerable to ASQA for their operations.

5.10 CONTACT INFORMATION

- At any time, you may contact INSCOPE TRAINING PTY LTD to:

- request access to your personal information under the Freedom of Information Act.
- correct your personal information
- make a complaint about how your personal information has been handled ask a question about this policy or Privacy Notice.

6. CONTINUOUS IMPROVEMENT

INSCOPE TRAINING PTY LTD will continually improve its privacy practices, ensuring that all personal information collected is used, stored securely and disclosed to parties only for the purposes it has been provided for.

7. RISK MANAGEMENT

INSCOPE TRAINING PTY LTD will conduct regular risk assessments to identify potential risks related to privacy of personal information.

Control measures will be implemented to minimise risks, including password protected and encrypted learner management system, restricting staff access to information needed to fulfil their duties, and clear policies on managing prospective, enrolled and completed student's private information.

8. POLICY IMPLEMENTATION

The implementation of this policy is supported by:

- Staff induction and training on privacy and data protection requirements
- Internal audits and validation activities
- Stakeholder feedback
- Version control and quality assurance mechanisms

Compliance with this policy will be reviewed at least annually, as part of INSCOPE TRAINING PTY LTD's quality assurance cycle, in alignment with our Self-Assurance Schedule.

9. FEEDBACK, COMPLAINTS AND APPEALS

INSCOPE TRAINING PTY LTD values your feedback and is committed to continuously improving the quality of the training and support we offer. We encourage all students to share their feedback, make appeals, and raise any complaints they may have regarding this policy. Students have a right to make a complaint or appeal a decision. Students can access our Complaints and Appeals Policy and lodge a complaint on our website.

10. ACCOUNTABILITY

The following table outlines the key roles within the organisation and their specific responsibilities in relation to the implementation, monitoring, and continuous improvement of this policy. Each role is accountable for ensuring the policy is upheld in practice and integrated effectively into relevant operational and compliance processes.

ROLES	RESPONSIBILITIES
Executive Officers	<ul style="list-style-type: none"> Oversee the implementation and resourcing of privacy compliance initiatives Approve significant changes related to data protection Ensure strategic alignment with regulatory obligations
Compliance Officer	<ul style="list-style-type: none"> Monitor compliance with privacy legislation and the Outcome Standards for NVR RTOs 2025 and relevant State and Territory Government contracts Maintain the Continuous Improvement Register Analyse and act on audit findings and privacy complaints
Marketing and Business Development Officers	<ul style="list-style-type: none"> Ensure students prior to enrolling have been provided the privacy notice.
Trainers and Assessors	<ul style="list-style-type: none"> Promote privacy awareness among learners Ensure personal data in assessments is appropriately managed Report breaches or risks to compliance staff Handle student information in line with privacy protocols Report any data handling concerns Support privacy assurance in assessment and feedback activities
Training Coordinators	<ul style="list-style-type: none"> Maintain secure student records Support accurate and confidential data collection processes Obtain consent (with signature where required) and keep evidence on student file. Escalate privacy risks or breaches to management
Third Party Providers	<ul style="list-style-type: none"> Adhere to INSCOPE TRAINING PTY LTD's privacy policy and contractual obligations Report issues or risks promptly Implement improvement actions where relevant

11. MONITORING

The Accountable Officer is responsible for ensuring Policy Instruments are reviewed, normally on a 12 month cycle from the date they came into effect or the date of the last review. An earlier review of the Policy Instrument may be initiated if significant regulatory changes occur or a need is identified. A Policy Instrument under review remains in force until the revised Policy Instrument is approved.

POLICY INFORMATION	
Accountable Officer	RTO Manager
Date Effective	4 December 2025

Review Date	4 December 2026
Version Number	2.1

12. REGULATORY FRAMEWORK

This policy has been developed with reference to a range of legislative instruments, standards, guidelines, and regulatory principles that govern our operations as an RTO. These frameworks ensure that we operate with integrity, uphold quality training and assessment practices, and meet our legal obligations to students, regulators, and the broader community.

The following documents underpin the principles and practices outlined in this policy and should be considered in its application:

- [AQF Qualifications Issuance Policy](#)
- [Competition and Consumer Act 2010](#)
- [Copyright Act 1968](#)
- [Corporations Act 2001](#)
- [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 \(Data Provision Requirements\) Instrument 2020](#)
- [National Vocational Education and Training Regulator \(Outcome Standards for Registered Training Organisations\) Instrument 2025](#)
- [National Vocational Education and Training Regulator Act 2011](#)
- [National Vocational Education and Training Regulator Regulations 2011](#)
- [National VET Data Policy](#)
- [Privacy Act 1988](#)
- [AVETMISS data element definitions: edition 2.3](#)
- [AVETMISS VET Provider Collection specifications: release 8.0](#)
- Queensland Vocational Education and Training Skills Assure Supplier Agreement and relevant state legislation
- Smart and Skilled Contract Terms and Conditions & Operating Guidelines and relevant state legislation
- Section 325, of the Work Health and Safety Regulation 2011 - the Agreement providing authority to issue General Construction Induction Training Cards in Queensland & the terms and conditions.
- Work Health and Safety Act 2020 and Part 6.5 of the Work Health and Safety Regulations 2022 (WA) - Issue of General Construction Induction Training Cards, Terms and Conditions between WorkSafe Western Australia Commissioner and Registered Training Organisation.
- SafeWork NSW Conditions for Registered Training Organisations Delivering General Construction Induction Training In NSW under the Work Health and Safety Regulation

13. RELATED DOCUMENTS

- Privacy Notice

For a complete and centralised list of interconnected documents - including associated policies, procedures, forms, and checklist - please refer to the Dependency Matrix located within the Quality Manual. This matrix has been designed to support consistency, version control, and alignment across the broader compliance framework.

14. DEFINITIONS

To ensure consistency and clarity across all policies, procedures, and supporting documents, INSCOPE TRAINING PTY LTD maintains a centralised Definitions Library, located within the Quality Manual. This resource contains standardised definitions of key terms and acronyms commonly used throughout our quality management system and compliance framework. All documents should be read in conjunction with the Definitions Library to support accurate interpretation and application of terminology. Where a term is used within this policy and is not explicitly defined herein, it should be understood according to its definition in the Definitions Library. The Definitions Library is reviewed and maintained regularly to reflect changes to legislation, regulatory standards, and sector-specific terminology. Any suggestions for additions or amendments to the Definitions Library should be directed to the Compliance Officer for consideration as part of our continuous improvement practices.