

1. PURPOSE

This policy describes the practices and procedures by which Quality Training & Hospitality College Pty Ltd, trading as Quality College of Australia (QCA) will ensure compliance with all relevant legislation to protect the personal information and right to privacy of those which are detailed within this policy.

QCA is committed to protecting the personal information and privacy rights of all individuals it deals with and to managing personal information in an open and transparent manner. QCA ensures that all learners are provided with clear, accurate and accessible information about how their personal information is collected, used and disclosed prior to enrolment, to support informed decision-making and compliance with the Standards for RTOs 2025.

2. SCOPE

This policy applies to all students (domestic and international), prospective students, anyone employed by or contracted to QCA and prospective staff/contractors. The Compliance Manager is responsible for the control and issuance of this policy.

3. LEARNER RIGHTS

QCA recognises and supports the rights of learners in relation to their personal information. Learners have the right to:

- Be informed about how their personal information is collected, used and disclosed
- Access their personal information held by QCA
- Request correction of inaccurate, incomplete or outdated information
- Be informed of any third parties to whom their information may be disclosed
- Make a complaint about the handling of their personal information

QCA ensures these rights are upheld in accordance with the 2025 Standards for RTOs.

4. FREEDOM OF INFORMATION

QCA supports the principles of openness and transparency. Learners may request access to personal information held by QCA in accordance with this policy and applicable privacy legislation. Where requested information is subject to the *Freedom of Information Act 1982*, access will be managed in accordance with that legislation.

5. PROCEDURE

QCA will ensure that the privacy of all individuals it deals with is respected with by complying with the Privacy Act 1988 and implementing the Australian Privacy Principles.

The Australian Privacy Principles (APPs) set out how private sector organisations should collect, use, keep secure and disclose personal information. The principles give individuals a right to know that information an organisation holds about them and a right to correct that information if it is wrong.

QCA will ensure it operates consistently with the APPs and only collects information that is necessary for the conducts of its business, and that it will use that information in the manner for which it was intended.

5.1 Status as Contracted Service Provider

QCA acknowledges that, where it provides services under government agreements, it acts as a contracted service provider and agrees to:

- Handle personal information as if it were an agency for the purposes of the APPs
- Not engage in any act or practice that would breach an APP if done by a government agency
- Use or disclose personal information only for the purposes of delivering services under the relevant agreement or as otherwise permitted by law.

5.2 Collection of Personal Information

QCA collects personal information only where reasonably necessary for its functions and activities, including:

- Course administration and delivery
- Assessment and certification
- Compliance with regulatory requirements

- Reporting to government agencies and regulators
- Employment and contractor management

Sensitive information will only be collected with consent or where authorised by law.

QCA will take reasonable steps to notify individuals of the purpose of collection, how their information will be used and any third parties to whom information may be disclosed.

This information is provided to learners prior to enrolment and at the point of collection to ensure informed consent is obtained.

5.3 Anonymity and Pseudonymity

Where lawful and practical, individuals may choose not to identify themselves or may use a pseudonym when dealing with QCA.

However, due to regulatory requirements associated with nationally recognised training, QCA will generally require individuals to provide their legal identity to enable enrolment, assessment, certification and reporting obligations to be met.

5.4 Use and Disclosure

QCA will only use or disclose personal information:

- For the primary purpose for which it was collected
- For related secondary purposes where reasonably expected
- Where required or authorised by law
- Where consent has been provided

QCA will not engage in direct marketing activities using personal information unless expressly authorised and compliant with APP 7.

QCA will not adopt, use or disclose government-related identifiers except as permitted under law.

5.5 Disclosure to Third Parties

Personal information may be disclosed to government departments and regulators, auditors and accreditation bodies, and third-party training or service providers.

Where this occurs, QCA ensures formal agreements are in place, third parties comply with privacy obligations equivalent to the APPs and individuals are informed where required.

This may include disclosure of learner information to national VET data collections and government bodies for statistical, regulatory and research purposes, in accordance with applicable laws and reporting requirements.

5.6 Data Quality and Security

QCA takes reasonable steps to ensure personal information is accurate, up-to-date, complete and relevant. Security measures include secure physical storage, password-protected electronic systems and restricted access controls.

QCA will take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

5.7 Record Keeping

QCA maintains learner, staff and organisational records electronically using secure student management and business systems. Records are retained in accordance with applicable legislative, contractual and regulatory requirements, including AQF certification retention requirements, and are protected through appropriate backup, security and access controls.

5.8 Data Retention and Disposal

QCA retains personal information only for as long as necessary to fulfil the purposes for which it was collected, including to meet legal, regulatory and contractual obligations.

When personal information is no longer required, QCA will take reasonable steps to securely destroy or de-identify the information in accordance with the Australian Privacy Principles.

5.9 Access and Correction

Individuals have the right to:

- Access their personal information
- Request correction of inaccurate or outdated information

Requests must be submitted to QCA and will require identity verification: 1300 511 888 or admin@qca.edu.au

Access will be provided unless an exception under the APPs applies. No cost will be charged for students accessing their information whilst they are enrolled students.

QCA ensures that access and correction processes are simple, timely and accessible to learners, in line with the 2025 Standards for RTOs.

5.10 Personnel Obligations

QCA ensures that all personnel who handle personal information:

- Are trained in privacy obligations
- Are made aware of their responsibilities under this policy and applicable agreements
- Provide written undertakings, where required, to comply with the APPs

Upon termination or resignation of personnel, QCA will:

- Immediately revoke access to personal information
- Require return or secure destruction of any personal information held
- Remind personnel of their ongoing confidentiality obligations

5.11 Cooperation with Regulators

QCA will cooperate with:

- The Department administering relevant agreements
 - The Office of the Australian Information Commissioner
- in relation to any inquiries, audits, or investigations concerning personal information.

QCA acknowledges that its name may be published in reports by the OAIC where required.

5.12 Openness

This Privacy and Personal Information Policy is publicly available upon request and through QCA's website.

Upon request, QCA will advise individuals of the types of personal information held, the purposes for which it is collected, and how it is collected, stored, used and disclosed.

5.13 Complaints and Privacy Rights

Individuals may make complaints about the handling of their personal information.

QCA will investigate all complaints promptly and respond within a reasonable timeframe.

Individuals will be notified that they may escalate complaints to the OAIC, which has the authority to investigate and award compensation where appropriate.

Complaints may be made in accordance with QCA's Complaints and Appeals Policy & Procedure. QCA will ensure that the complaints process is accessible, fair and responsive.

5.14 Data Breaches

QCA will comply with the Notifiable Data Breaches scheme under the Privacy Act.

Where QCA becomes aware of a suspected or actual data breach, it will:

- Notify the relevant Department within one (1) business day
- Assess whether the breach is an eligible data breach
- Take all reasonable steps to mitigate harm
- Notify affected individuals where required
- Notify the OAIC where required

QCA will comply with any directions issued by the Department or the OAIC in relation to the breach.

5.15 Tax File Number Information

Where QCA collects or handles tax file number information, it will comply with:

- Privacy (Tax File Number) Rule 2015
- Tax Administration Act 1953

Such information will be securely stored and used only for lawful purposes.

5.16 Cross-Border Disclosure

QCA will take reasonable steps to ensure that any overseas recipients of personal information comply with the APPs or equivalent privacy protections.

5.17 Use of Digital Systems and AI

QCA ensures that digital systems, including AI tools and cloud-based platforms are assessed for privacy risks, comply with applicable privacy requirements, and are used with informed consent where required.

Where artificial intelligence or automated decision-making tools are used in ways that may impact learners, QCA will ensure that learners are informed and that appropriate human oversight is maintained.

5.18 Review

This policy will be reviewed annually or earlier if:

- Legislative changes occur
- Operational changes impact privacy practices
- Required by regulatory or contractual obligation

6. ROLES AND RESPONSIBILITIES

QCAs Governance Review Committee (GRC) is responsible for monitoring information management procedures and standards across QCA in line with QCA-POL-01-Annual Governance Review.

The Compliance Manager is responsible for:

- Maintaining and reviewing this policy
- Ensuring compliance with privacy legislation and contractual obligations
- Responding to requests for access or correction of personal information
- Coordinating responses to privacy complaints and data breaches
- Ensuring secure management, retention and disposal of records
- Providing privacy guidance and training to personnel

All QCA personnel are responsible for:

- Complying with this policy
- Maintaining confidentiality of personal information
- Protecting information from unauthorised access or disclosure
- Reporting suspected privacy breaches immediately
- Securely handling and disposing of personal information in accordance with this policy

7. DEFINITIONS

APP	Australian Privacy Principles
AS	Australian Standards
FOI Act	Freedom of Information Act 1982
GRC	Governance Review Committee
Personal information	Information or an opinion (including information or an opinion forming part of a database), that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained from the information or opinion. Information that can identify a person, such as name, address or photograph.
Primary Purpose	Personal information for a purpose for which it was collected.
Secondary	Personal information for a secondary purpose if an exception applies.

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Purpose	The exceptions include where: • The individual has consented to a secondary use or disclosure. • The individual would reasonably expect QCA to use or disclose their personal information for the secondary purpose, and that purpose is related to the primary purpose of collection, or, in the case of sensitive information, directly related to the primary purpose. • The secondary use or disclosure is required or authorised by or under an Australian law or a court/tribunal order • A permitted general situation exists in relation to the secondary use or disclosure • A permitted health situation exists in relation to the secondary use or disclosure • QCA reasonably believes that the secondary use or disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body, or QCA discloses biometric information or biometric templates to an enforcement body, and the disclosure is conducted in accordance with guidelines made by the Information Commissioner for the purposes of APP 6.3.
Sensitive information	Information about a person's racial or ethnic origin, political opinions, religious beliefs, membership of a trade union, professional or trade association, sexual preference, criminal record and health information.

8. RELATED DOCUMENTS

- Privacy Act 1988
- Privacy Amendment (Enhancing Privacy Protection) Act 2012
- Australian Privacy Principles
- Privacy (Tax File Number) Rule 2015
- Tax Administration Act 1953
- VET Quality Framework
- Freedom of Information Act 1982
- QCA-POL-12 Feedback, Complaints and Appeals
- QCA-POL-## Records Management Policy
- QCA-POL-## Fraud and Corruption Plan
- QCA-POL-## Data Breach