

POLICY

Purpose

The purpose of this Privacy Policy and Procedure is to explain how Work Savvy manages personal and sensitive information in accordance with applicable privacy laws. This includes how we collect, store, use, disclose, and dispose of personal data.

The policy applies to all aspects of Work Savvy' operations and demonstrates our commitment to transparency, accountability and ethical data handling. It ensures that the privacy rights of individuals, including students, staff, contractors, stakeholders and third parties are protected in accordance with relevant legislation, including:

- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
- Australian Privacy Principles (APPs)
- The Office of the Australian Information Commissioner (OAIC)
- National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025.

These compliance obligations operate under the broader 2025 Standards for Registered Training Organisations.

Work Savvy delivers training and services across Australia and complies with all applicable state and territory privacy laws, including:

- Privacy and Personal Information Protection Act 1998 (NSW)
- Health Records and Information Privacy Act 2002 (NSW)
- Information Privacy Act 2009 (Qld), including obligations for Bound Contracted Service Providers.

Scope

This policy applies to all personal and sensitive information collected, stored, used, or disclosed by Work Savvy, in both physical and digital formats.

It covers:

- Students and prospective students
- Employees, trainers/assessors, contractors and volunteers
- Stakeholders and third parties involved in the delivery of training, assessment, support services or system management
- Information collected through enrolment forms, learning platforms, websites, communications, surveys, and government-funded program reporting channels.

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This policy applies to all personnel of Work Savvy who access, manage, or process personal information in any administrative, training, assessment, compliance or support capacity.

As part of our commitment to privacy compliance and risk management:

- A Privacy Impact Assessment (PIA) has been conducted
- A Privacy Notice is issued at enrolment to inform students how their data may be used, including lawful disclosures to government agencies and funding bodies.

This scope also includes any third-party systems or services used by Work Savvy to manage student records or support regulatory reporting (e.g. LMS, SMS, cloud storage or data processors), which must comply with all relevant privacy laws and contractual obligations.

Definitions

Australian Privacy Principles (APPs)	A set of 13 rules under the Privacy Act 1988 that set out how organisations must handle personal information. These cover things like collection, access, correction, and data security.
Consent	Permission given by a person for their personal information to be collected, used or shared. Consent must be informed, voluntary and current.
Data breach	When personal information is accessed, disclosed, lost, or used without permission. This may be accidental or intentional and could risk someone's privacy.
Disclosure	Sharing personal information with someone outside the organisation, such as a government agency, training partner, or funding body.
Office of the Australian Information Commissioner (OAIC)	It is the independent national regulator responsible for: • Privacy and the handling of personal information under the Privacy Act 1988 (Cth) • Promoting and enforcing the Australian Privacy Principles (APPs) • Overseeing the Notifiable Data Breaches (NDB) scheme OAIC receives complaints from individuals, investigates privacy breaches and can impose enforcement actions or penalties for serious or repeated breaches.
Personal information	Information or an opinion about a person that can be used to identify them. This includes things like name, date of birth, address, phone number, email address, or government identifiers such as a USI or Medicare number.

Privacy Notice	A statement provided to individuals that explains how their personal information will be collected, used, stored, and disclosed. It helps people understand their rights and what will happen with their data.
Sensitive information	A special type of personal information that includes details about a person's health, racial or ethnic background, political opinions, religious beliefs, sexual orientation, or criminal record. This kind of information must be handled more carefully
Stakeholders	People or organisations that are involved in or affected by the operations of Work Savvy. This includes students, staff, employers, funding bodies, regulatory agencies, and industry partners.
Student	Any person who is enrolled, applying to enrol, or has previously been enrolled in a course or training program delivered by Work Savvy.
Third Party	An individual or organisation not directly employed by Work Savvy that provides services on its behalf. This may include: • training partners • Training or assessment contractors • Student management system providers • Funded program partners (e.g. DTET, Training Services NSW) • NCVET, ASQA, or other government agencies via contract or legal obligation
Use	How Work Savvy handles or works with personal information within the organisation. This includes storing, reviewing, or using the information to deliver training or support services.
VET Provider	A VET provider is an organisation that delivers vocational education and training (VET) services. This includes Registered Training Organisations (RTOs) that are approved to deliver nationally recognised training and issue qualifications under the Australian Qualifications Framework (AQF). VET providers may include private training organisations, TAFEs, community education providers and some schools or universities.

Policy

Work Savvy is committed to protecting the privacy and confidentiality of personal and sensitive information in accordance with the *Privacy Act 1988 (Cth)*, including the *Australian Privacy Principles (APPs)*, and relevant state and territory privacy legislation.

We collect, use, store and disclose personal information only for purposes directly related to a student's training and assessment, student support, compliance with funding contracts and regulatory reporting obligations.

Personal information is shared with relevant third parties, including:

- NCVER (National Centre for Vocational Education Research). Under the National Vocational Education and Training Regulator (Data Provision Requirement) Instrument 2020, we're required to collect personal information and disclose that personal information to NCVER).
- State and Commonwealth funding bodies
- Regulatory authorities such as the Australian Skills Quality Authority (ASQA)
- The Student Identifiers Registrar for the purpose of creating or verifying a USI, as required under the *Student Identifiers Act 2014 (Cth)*.
- Other entities where required or authorised by law

This may include information used for:

- Enrolment processing and course delivery
- Determining eligibility for government funding
- Statistical, compliance and audit reporting
- Verification of training outcomes and issuing credentials

Work Savvy takes all reasonable steps to ensure the personal information we hold is accurate, up to date, and securely stored. We protect this information against misuse, interference, loss, unauthorised access, modification or disclosure.

We do not disclose personal information to overseas recipients unless required or authorised by law, or with an individual's express consent.

Individuals have the right to access and request correction of their personal information held by Work Savvy. The individual may also request further details about how their information is managed or make a privacy complaint. Please refer to our Privacy Procedure for information on how to submit a request or complaint.

Work Savvy maintains a Privacy Management Plan (PMP) in compliance with *Privacy and Personal Information Protection Act 1998* (NSW) that outlines how we apply the Australian Privacy Principles (APPs) in practice, including detailed procedures for collection, storage, use, disclosure, access and correction of personal and sensitive information.

Where a person fails or refuses to provide the required information for enrolment, the person's enrolment may be refused or not able to proceed until the required information is provided. This applies to both mandatory sections of the enrolment form and required documentation.

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This policy should be read in conjunction with the Privacy Management Plan and Data Breach Response Plan, which provide additional operational detail and support compliance with the *Privacy Act 1988* and the *Standards for RTOs 2025*.

NCVER PRIVACY NOTICE

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 NCVER and other bodies handle your personal information

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.

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For more information about how 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.

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 DEWR will handle your personal information, please refer to the DEWR VET Privacy Notice at <https://www.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 Work Savvy 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

PROCEDURE

1. Collection of information

Procedure		Responsibility
1.1	Personal information will be collected only when: - It is for a purpose directly related to students, and - The collection is necessary for, or directly connected to, that purpose.	All Staff
1.2	Personal information will not be collected by unlawful or unfair means.	Data
1.3	Where personal information is collected for inclusion in a record or in a generally available publication Work Savvy will take reasonable steps to ensure that, before the information is collected or, if that is not practicable, as soon as practicable after the information is collected, the student concerned is generally aware of: - The purpose for which the information is being collected - If the collection of the information is authorised or required by or under law the fact that the collection of the information is so authorised or required - With whom the information may be shared.	Data
1.4	Where Work Savvy solicits and collects personal information for inclusion in a record or in a generally available publication it will take reasonable steps to ensure that: - The information collected is relevant to that purpose and is up to date and complete - The collection of the information does not intrude to an unreasonable extent upon the personal affairs of the student.	Data
1.5	Where Work Savvy is required to apply for a Unique Student Identifier (USI) on behalf of a student, personal information will be collected and disclosed to the Student Identifiers Registrar in accordance with the <i>Student Identifiers Act 2014 (Cth)</i> .	Data
1.6	If a prospective student fails or refuses to provide the required information for enrolment, the enrolment process will be paused.	Student Support

	- The enrolment will not proceed until all mandatory sections of the enrolment form and required documentation are provided. - Student Support will notify the person of the missing information and request submission of the required details within 5 business days. - If the required information is not provided within the specified timeframe, the CEO is notified and the enrolment may be refused.	CEO
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2. Storage and security of personal information

Procedure		Responsibility
2.1	Work Savvy will ensure: - The information is protected, by such security safeguards as it is reasonable in the circumstances to take, against loss, against unauthorised access, use, modification or disclosure, and against other misuse, and - If it is necessary for the record to be given to a person in connection with the provision of a service to the VET Provider, everything reasonably within the power of the VET Provider will be done to prevent unauthorised use or disclosure of information contained in the record.	GM
2.2	Work Savvy will systematically manage and secure personal information records in accordance with privacy, legal and regulatory obligations. This includes maintaining clear processes that: - Demonstrate what personal information is held and why it is collected - Define how long records are retained and how they are securely disposed of - Identify who is authorised to access personal information and under what conditions Evidence of these practices will be maintained as part of Work Savvy' overall data governance and records management framework.	Compliance
2.3	Work Savvy will not use the information without taking reasonable steps to ensure that, having regard to the purpose for which the information is proposed to be used, the information is accurate, up to	GM

	date and complete. Work Savvy will not use the information except for a purpose to which the information is relevant.	
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3. Disclosure

Procedure		Responsibility
3.1	Work Savvy will not disclose the information to a person, body or agency (other than the individual concerned) unless: - The individual concerned is reasonably likely to have been aware that information of that kind is usually passed to that person, body or agency - The individual concerned has consented to the disclosure - Work Savvy believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the student or of another person - The disclosure is required or authorised by or under law - The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.	GM
3.2	Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of the public revenue, a note of disclosure shall be made containing that information.	GM
3.3	Information may be disclosed to the National Centre for Vocational Education Research (NCVER), relevant State and Commonwealth government agencies, and other parties as required by law or contract, for the purposes of data collection, auditing and reporting.	Data

4. Access to and Correction of Personal Information

Procedure		Responsibility
4.1	Individuals may request access to their personal information held by Work Savvy or request that we correct inaccurate or outdated information.	Student/ Individual
4.2	Requests must be made in writing to Student Support by email or post.	Student/ Individual
4.3	Upon receiving a request, Work Savvy will acknowledge receipt and assess the request within 30 calendar days in accordance with the Privacy Act 1988.	Compliance
4.5	Where access is refused or correction is not made, Work Savvy will provide a written explanation outlining the reason for the refusal, in accordance with the Privacy Act 1988.	CEO
4.6	If a correction is refused, the individual may request that a statement be attached to the record noting the requested amendment.	Student/ Individual
4.7	All requests and outcomes will be recorded and stored securely as part of the individual's file.	Compliance

5. Data Breach Management

Procedure		Responsibility
5.1	Any staff member who suspects a data breach must report it immediately to the Chief Executive Officer.	All Staff/ Contractors
5.2	The Chief Executive Officer or delegate will assess the suspected breach to determine if it meets the threshold of an eligible data breach under the Notifiable Data Breaches (NDB) scheme in the <i>Privacy Act 1988</i> .	CEO/ delegate
5.3	If the breach is likely to result in serious harm to an individual, the Chief Executive Officer will notify: - The affected individual(s), and - OAIC using the prescribed notification form.	CEO/ Compliance
5.4	Work Savvy will take immediate steps to contain the breach, mitigate further harm, and prevent recurrence.	Compliance

5.5	A record of the breach, actions taken, and notifications made will be documented and securely stored in accordance with our recordkeeping procedures.	Compliance
5.6	Work Savvy will maintain and regularly review a Data Breach Response Plan to ensure breaches are managed promptly and in line with legal obligations.	Compliance

6. Staff Training and Awareness

Procedure		Responsibility
6.1	All staff are to be aware of and trained in their privacy obligations, including how to collect, store, use, and disclose personal information lawfully and securely.	GM
6.2	All staff, including trainers, assessors, contractors and administrative personnel are to complete privacy training as part of their induction.	GM
6.3	Refresher training on data protection, privacy obligations and breach reporting procedures will be provided at least once every two years or when legislation or policy changes occur.	GM
6.4	Staff are to understand their obligations under the Privacy Act 1988, the Australian Privacy Principles (APPs), and any applicable state legislation or contractual requirements (e.g. Queensland's QPPs, NSW's PPIP Act).	GM
6.5	Records of staff training completion will be maintained in the organisation's HR or compliance records.	CFO

7. How to contact us to make a privacy complaint

Procedure		Responsibility
7.1	Any individual who has a concern or enquiry about how Work Savvy manages personal information, or who believes their privacy has been breached, may submit a complaint.	Student / Individual
7.2	Privacy complaints must be submitted in writing to the Chief Executive Officer via email at studentsupport@stridelearning.com.au .	Student / Individual

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7.3	Upon receiving a complaint, the Chief Executive Officer will acknowledge receipt and initiate a confidential investigation in line with Work Savvy' Grievances, Complaints & Appeals Policy.	CEO / delegate
7.4	The complainant will be advised of the outcome of the investigation within the timeframe specified in Work Savvy' Grievances, Complaints & Appeals Policy.	CEO / delegate
7.5	All privacy complaints and related records will be securely stored and managed in accordance with Work Savvy' recordkeeping procedures.	Compliance

Related Documents

Privacy Management Plan

Data Breach Response Plan

POLICY & PROCEDURE Records Management Policy

POLICY & PROCEDURE USI

POLICY & PROCEDURE Grievances, Complaints & Appeals

POLICY & PROCEDURE Training and Assessment

SUPPORTING DOCUMENT Student Handbook

Responsible Officer

The responsible officer for the implementation of this Policy and Procedure is the General Manager.

Publishing details

Document Name	Privacy Policy and Procedure
Proposed by	Compliance
Approved by	CFO
Date of Approval	August 2025
Version	1.1
Next Review Date	August 2026

Version History

Version	Date	Summary of content (new) or amendments (revised)
1	5/08/2025	Updated to comply with new Standards for RTOs 2025 and other regulatory and funding bodies
1.1	12/08/2025	Added the consequences of not providing requested information, as stipulated by DTET's requirement