

# TIME Education and Training

Quality Management System

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## Information Privacy and Protection Procedure

Procedure

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<b>Document Owner</b>	Privacy Officer
<b>Authorised by</b>	Quality Assurance Analyst

# 1. Purpose


This procedure outlines the processes and controls used to ensure that all students and/or contacts are protected from risk in the form of data breaches or misuse of personal information. It also highlights relevant information on the collection and transfer of data as it relates to student records and training data under the AVETMIS Standard.

# 2. Scope

This policy applies to:

- All staff employed by TIME Education and Training, including permanent, part-time, and casual employees.
- All contractors and consultants engaged by TIME Education and Training.
- All third-party providers operating under a formal agreement with TIME Education and Training.
- All training and assessment activities, operations, and support services conducted within, or on behalf of, the RTO.

Primary responsibility for the administration and maintenance of the Information Privacy and Protection procedure and portfolio rests with the Privacy Officer.

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### 3. Definitions

Term	Definition
<b>AVETMISS</b>	Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) is the national data standard which ensures the consistency and accuracy of VET activity information.
<b>NCVER</b>	National Centre for Vocational Education Research (NCVER) is a national research, evaluation and information organisation for the VET sector in Australia. NCVER is the data custodian of the national VET statistical collections and national VET survey collections.
<b>DEWR</b>	Australian Government Department of Employment and Workforce Relations
<b>STA/TTA</b>	State or Territory Training Authority – Responsible for the administering of training (including funding) programs within their jurisdiction. Will collect student data either directly or via NCVER.
<b>aXcelerate</b>	Student Management System/Learning Management System used by Time Education and Training for collecting, storing, and reporting student data to authorities such as NCVER, Skills SA or other relevant organisations.
<b>Risk Register</b>	A document maintained by the Quality Assurance Analyst that records identified risks, their likelihood and consequence, and the controls and actions in place to manage them.
<b>Continuous Improvement Register</b>	A document that records all improvement activities, feedback, audit outcomes, and corrective actions, and tracks their resolution.

## 4. Roles & Responsibilities

Role	Responsibility
<b>CEO</b>	Holds ultimate accountability for the RTO's compliance with the Privacy Act 1988 and the Australian Privacy Principles. Ensures the organisation has the necessary resources and secure infrastructure to protect personal information and authorises the RTO's response to any significant data breaches.
<b>Privacy Officer (Education Technology Analyst)</b>	Acts as the primary point of contact for all privacy enquiries, requests for data access, and corrections. Manages the day-to-day implementation of this procedure, oversees the Notifiable Data Breaches scheme requirements, and provides guidance to staff on the lawful collection and use of student data. Is responsible for all reporting associated with training activity data to the NCVET or STA as relevant.
<b>Quality Assurance Analyst</b>	Integrates privacy compliance into the internal audit and continuous improvement cycles. Maintains the Risk Register and Continuous Improvement Register concerning data security and privacy risks and monitors the effectiveness of corrective actions where gaps are identified.
<b>All Staff and Contractors</b>	Must adhere to the Australian Privacy Principles in all operational activities, ensuring personal data is handled securely and used only for its primary purpose. Responsible for maintaining digital and physical security protocols and promptly reporting any suspected data breaches or privacy concerns to the Privacy Officer.
<b>Third-Party Providers</b>	Obligated to manage all personal information collected or handled on behalf of TIME Education and Training in strict accordance with this procedure and their written agreement. Must immediately report any data breaches to the RTO and participate in privacy-focused audits as required.

## 5. Regulatory Requirements

### 5.1 Standards for NVR RTOs – Outcome Standards

Standard	Requirement
<b>Standard 4.4(c)</b>	The RTO demonstrates how it has mechanisms in place to lawfully collect and analyse data including any feedback received from VET students, staff, industry, VET regulators, State and Territory training authorities and employers of current or former VET students.

### 5.2 Standards for NVR RTOs – Compliance Requirements


Requirement	Description
<b>Section 20a</b>	Personal information is collected, used and disclosed by the organisation in accordance with all applicable privacy laws; and
<b>Section 20b</b>	The organisation complies with all applicable requirements under the Student Identifiers Act 2014.

### 5.3 Standards for NVR RTOs – Credential Policy

Requirement	Description
<b>Nil</b>	

### 5.4 Additional Legislation/Regulatory Requirements

Requirement	Description
<b>Privacy Amendment (Enhancing Privacy Protection) Act 2012/Privacy Act 1988</b>	Governs the Australian Privacy Principles and sets standards for privacy protection.
<b>National VET Data Policy: December 2020</b>	Defines the AVETMIS Standard and minimum verbiage for student enrolment privacy statements as seen in Section 9.

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## 6. Communication & Review

### 6.1 Communication

This procedure and all associated supporting documents will be communicated to all relevant stakeholders, including staff, contractors, and third-party providers, via:

- Inclusion in the RTO's Policy and Procedure Manual (available on the organisation's internal network and shared document system).
- Staff induction and onboarding sessions.
- Regular team meetings, toolbox talks, and compliance updates.
- Inclusion in written agreements with contractors and third-party providers.


All staff and contractors will be required to confirm their understanding of this policy as part of initial and ongoing compliance training. Confirmation of acknowledgement will be recorded and maintained.

### 6.2 Review

This procedure will be reviewed:

- At least annually as part of the RTO's internal audit and review cycle.
- When changes to legislation, Standards for RTOs, or operational procedures occur.
- In response to identified non-compliance, complaints, feedback, or incidents that impact the policy's effectiveness.
- Following any ASQA audit or regulatory action that relates to the QMS.

All review outcomes will be documented on the Continuous Improvement Register. Any updates will be communicated promptly to all relevant stakeholders and the updated document stored in accordance with the Document Register procedure.


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## 7. Risk Management

Failure to comply with this policy and the associated standards may result in:

Hazard	Risk
Unauthorised access to the Student Management System (aXcelerate) or internal network.	Data breach involving sensitive student information, leading to regulatory sanctions, financial penalties, and loss of organizational trust.
Human error during the entry, collection, or transfer of AVETMISS data to NCVET or State Training Authorities.	Inaccurate data reporting resulting in legislative non-compliance, funding discrepancies, and potential audits by regulatory bodies.
Failure to securely destroy sensitive identity documents (e.g., copies of ID for USI verification) once the primary purpose is fulfilled.	Unauthorised disclosure of personal identifiers, resulting in a direct breach of APP 11 and potential identity theft for the individual.
Unauthorised disclosure of student records to a third party (e.g., employer or parent) without verified written consent.	Breach of APP 12 and privacy legislation, leading to legal disputes and damage to the RTO's professional reputation.
Inadequate staff training regarding current privacy protocols and the 13 Australian Privacy Principles.	Accidental mishandling of data and failure to meet the governance requirements of Outcome Standard 4.3.
Failure to identify or report an eligible data breach within the timeframes required by the Notifiable Data Breaches scheme.	Significant regulatory penalties from the OAIC and mandatory public disclosure requirements that cause severe reputational damage.
Incorrect application of marketing preferences, such as sending materials to individuals who have opted out.	Breach of APP 7 and Australian consumer law, resulting in student complaints and potential regulatory investigation.
Use of non-Australian data centres or offshore cloud services for storing personal information.	Breach of APP 8 (Cross-border disclosure) and failure to meet internal commitments to Australian-only data residency.

All identified risks will be recorded on the Risk Register and managed in accordance with the Risk Management Procedure.

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## 8. Policy Statement

TIME Education and Training is committed to the transparent and ethical management of personal information in accordance with the Privacy Act 1988 and the Notifiable Data Breaches scheme.

As a Registered Training Organisation, we collect and record personal data to fulfill our educational and regulatory obligations, ensuring that all such information is protected by the 13 Australian Privacy Principles (APPs).

Ensuring that you understand your rights and obligations regarding your personal information is important to us. We invite your questions and concerns regarding your personal information. Please contact our **Privacy Officer**, Hamish Kerr, who can be contacted via [privacy@time.net.au](mailto:privacy@time.net.au) or via phone on 08 8351 9888.

### 8.1. APP1: Open and transparent management of personal information

TIME Education and Training maintain transparent processes by clearly outlining the purpose of data collection on all enrolment forms. Comprehensive information regarding our privacy practices is publicly accessible in the Student Handbook and this procedure via our website and printed or digital copies can be provided upon request.


### 8.2. APP 2: Anonymity and pseudonymity

Due to mandatory national VET data reporting obligations and the statutory requirement for all students to hold a verified Unique Student Identifier (USI), TIME Education and Training cannot permit individuals to enrol or train anonymously or under a pseudonym in accredited training programs. All student records must reflect the legal identity verified through official documentation.

Non-accredited enrolments will be managed on a case-by-case basis where relevant to the situation but in general will also be unable to occur anonymously or under a pseudonym. Non-accredited enrolments are not required to provide a USI nor are they required to provide data to meet the AVETMIS Standard and as such there is more leniency in these cases.

### 8.3. APP 3: Collection of solicited personal information

We only collect personal information that is directly necessary for our educational operations and mandated by relevant commonwealth and state VET legislation, including the Standards for RTOs 2025. Sensitive or financial details are only recorded with explicit consent and where strictly necessary to manage specific circumstances, such as adjusting government-subsidised training contracts or processing attendance support. Information is gathered directly from the individual unless formal government agency workflows dictate otherwise.

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## 8.4. APP 4: Dealing with unsolicited personal information

TIME Education and Training do not accept, record, or retain unsolicited personal information. Any unsolicited data received that is not relevant to official student administration or regulatory compliance is immediately and securely destroyed or permanently de-identified.

## 8.5. APP 5: Notification of the collection of personal information

Before or at the time of data collection, we ensure individuals are fully informed about why their personal information is required, how it will be used, and the regulatory frameworks governing its collection. This notification is integrated directly into our onboarding documentation and the Student Handbook.

## 8.6. APP 6 Use or disclosure of personal information

Personal data is strictly used for the primary purpose for which it was originally collected. For example, identity documentation supplied solely for USI verification is securely destroyed immediately after the verification process is complete. Concession evidence is protected and restricted to authorised funding bodies for mandatory compliance periods. We do not sell or disclose personal information to external parties unless authorised by the individual, required by law, or necessary to prevent an immediate threat to safety or health.

## 8.7. APP 7: Direct marketing


Individuals are provided with a clear option to opt out of receiving direct marketing materials during the enrolment process. Marketing preferences can be updated at any time by contacting us directly, and our systems are adjusted immediately to reflect these changes.

## 8.8. APP 8: Cross-border disclosure of personal information

TIME Education and Training does not disclose, transfer, or store personal information with any individuals, entities, or cloud jurisdictions outside of Australia. All data is stored either on-premises or within verified, Australian-Only Data Centres.

## 8.9. APP 9: Adoption, use or disclosure of government related identifiers

Internal academic records and student identifiers are managed using a unique student number generated independently by our internal systems. We do not adopt or use government-issued identifiers, such as a USI, as our primary internal identification system.

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## 8.10. APP 10: Quality of personal information

We take all reasonable steps to ensure that the personal information we collect, use, and disclose remains accurate, complete, and up to date. We actively encourage stakeholders to notify us promptly of any changes to their contact details or personal circumstances.

## 8.11. APP 11: Security of personal information


Personal information is protected by rigorous security infrastructure. Electronic records are maintained on secure databases protected by access controls, while physical files are protected via monitored security alarms and strict physical access restrictions. Records are securely destroyed or permanently de-identified once their legislative retention period expires.

## 8.12. APP 12: Access to personal information

Individuals may request formal access to the personal records we hold about them, with requests processed within 30 calendar days. Strict identity verification is performed prior to releasing any information. Third-party access requests require explicit, written authority from the individual, specifying verifiable personal details and clear boundaries for the disclosure. Access requests from government or regulatory agencies are rigorously verified against relevant legislative instruments or confirmed directly with the individual prior to release.

## 8.13. APP 13: Correction of personal information

Where records are identified as inaccurate, outdated, or incomplete, we proactively engage with the individual or their authorised representative to verify the correct details and update our systems accordingly.

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## 9. Procedures

All students must be presented with the following VET Data Collection Notice before enrolling. This is managed by the online web-based enrolment form requiring a signed agreement to this notice, and the file-based form involving the acknowledgement of the full privacy policy as found on our website.

### 9.1 Time Education and Training VET Data Collection 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.

If you choose not to provide us with the required information, we will be unable to proceed with your enrolment.

#### 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, for example Skills SA for South Australian enrolments.


#### 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.

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

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

For more information about how the NCVET will handle your personal information please refer to the NCVET's Privacy Policy at [www.ncvet.edu.au/privacy](http://www.ncvet.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 NVET 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/vet-privacy-notice>.

South Australian enrolments are also subject to the Information Privacy Principles of the Government of South Australia which can be found at <https://www.dpc.sa.gov.au/resources-and-publications/premier-and-cabinet-circulars/DPC-Circular-Information-Privacy-Principles-IPPS-Instruction.pdf>.

## Surveys

You may receive a student survey which may be run by a government department or an NCVET 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 Time Education and Training 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

A full version of our Privacy Policy can be found at <https://time.net.au/student-resources/>.

Our **Privacy Officer**, Hamish Kerr, can be contacted via [privacy@time.net.au](mailto:privacy@time.net.au) or via phone on 08 8351 9888.

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## 10. Supporting Documents

Document Number	Document Title	Type
VSS-PRO-001	Information and Enrolment Procedure	Procedure
VSS-DOC-001	Student Handbook	Document
VSS-DOC-002	Pre-Enrolment Interview	Document
VSS-DOC-003	Accredited Program Application Form	Document
VSS-DOC-004	Non-Accredited Application Form	Document
VSS-DOC-005	Enrolment Agreement Form	Document

# Version Control

Version Control			
<b>Author(s):</b>	Hamish Kerr		
<b>Authorised by:</b>	Adam Metz		
<b>Signature:</b>		<b>Date:</b>	07 May 2026

Version	Action	Date
1.0	Initial Development	April 2026
2.0	<b>Update to new QMS format, all sections revised and/or expanded.</b>	<b>May 2026</b>