PIONEER COLLEGE
RTO: 45763 CRICOS: 03956A

Privacy

Policy and Associated Procedures

September 2026

Pioneer Education Institute Pty Ltd t/a Pioneer College

Head Office and Campus: Level 1 150-152 Adelaide Terrace, EAST PERTH, WA, 6004 | Tel: |+61 | 433 500 276
Email: ceo@pioneercollege.edu.au

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1. Purpose and Scope

1.1 This policy and associated procedures outline Pioneer College's (hereafter referred to as 'Pioneer') approach to ensuring the privacy and confidentiality of all of its staff, students and relevant others.

1.1.1 This policy and associated procedures meet the applicable information management requirements under the Compliance Requirements for RTOs, Standard 3 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, the National VET Regulator (Data Provision Requirements) Instrument 2020, and the National VET Data Policy.

1.1.2 This policy applies to all operations within Pioneer, including online and face-to-face, and all forms of information, whether in physical or electronic form.

1.1.3 All staff and contractors are responsible for complying with the policies and procedures laid out in this document.

2. Related Documents

Privacy Statement

Complaints and Appeals Policy and Associated Procedures

Critical Incident Policy and Associated Procedures

Continuous Improvement Register

3. Related Legislation

3.1 *Education Services for Overseas Students (ESOS) Act 2000*, specifically the *National Code 2018*

3.2 *National Vocational Education and Training Regulator (NVETR) Act 2011*, specifically the *2025 Standards for Registered Training Organisations (RTOs)*

This policy and associated procedures will contribute to Pioneer complying with other requirements such as included in the:

- *ELICOS Standards 2018*
- *Equal Opportunity Act 1984 (WA)*
- *Privacy Act 1988*
- *USI Act 2013*
- *Fair Work Act 2009*
- *Copyright Act 1968*

4. Definitions

Personal Information	Information that identifies, or could reasonably be used to identify, an individual. Includes details such as full name, address, phone numbers, date of birth, and can also extend to other private information such as health records, financial details or online identifiers.
Sensitive Information	Information or opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual orientation or practices; or criminal record; that is also personal information; as well as health information, genetic information, and biometric information or templates, as defined in section 6 of the Privacy Act 1988.
Privacy Statement	Pioneer's public-facing statement of its privacy practices, available on request
Privacy Notice	A short statement included in the Enrolment Application Form and Letter Of Offer Student Enrolment Acceptance Agreement explaining how a person's information is collected and used.

5. Policy Statements

5.1 Privacy Legislation and Principles

5.1.1 Pioneer has adopted the Australian Privacy Principles contained in the Privacy Act 1988[1].

5.2 Collection of Personal Information

5.2.1 Pioneer collects personal information only for the purposes of its business operations.

5.2.2 Pioneer also collects personal information about students undertaking nationally recognised training and discloses this information to the National Centre for Vocational Education Research Ltd (NCVER).

5.2.3 Pioneer provides information to staff and students about why their information is being collected and how it will be used, as well as their ability to access information held about them.

5.2.4 Both staff and students have the right to request that their personal information be changed.

5.2.5 A Privacy Notice is included in the Application for Enrolment Form and Offer Letter and Student Agreement.

5.2.6 Staff contracts refer to privacy rights and obligations.

5.2.7 All personal information is kept secure and confidential at all times.

5.2.8 All persons have the right to make a complaint or appeal in relation to privacy matters as per Pioneer's Complaints and Appeals Policy and Procedures.

[1] Privacy Act 1988 (https://www.legislation.gov.au/C2004A03712/latest/text)

5.2.9 Pioneer may collect personal information belonging to the following categories:

5.2.9.1 Personal information involving names, addresses, email addresses, phone numbers, date of birth.

5.2.9.2 Educational information including transcripts, grades and other personal credentials.

5.2.9.3 Information for employment reasons including job titles, and other employment-related information.

5.2.9.4 IP addresses, the type of device used to access the site, and pages visited.

5.3 Sensitive Information

5.3.1 Pioneer also collects 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.

5.3.2 Sensitive information will only be used by Pioneer:

5.3.2.1 For the primary purpose for which it was obtained

5.3.2.2 For a secondary purpose that is directly related to the primary purpose

5.3.2.3 With an individual's consent; or where required or authorised by law.

6. Procedures

6.1 Managing Personal Information

6.1.1 Pioneer collects personal information through:

6.1.1.1 Forms filled in by students and staff.

6.1.1.2 Through Pioneer's website.

6.1.1.3 Phone and email conversations.

6.1.1.4 Academic records and submissions.

6.1.2 The information that is collected is used for the following purposes:

6.1.2.1 To provide educational services.

6.1.2.2 To communicate Pioneer-related information such as events, job vacancies, and other notifications.

6.1.2.3 Academic purposes such as maintaining records, planning schedules, and processing grades.

6.1.2.4 To respond to inquiries or complaints.

6.1.2.5 To provide alumni services.

6.1.2.6 Legal or compliance purposes.

6.1.2.7 Reporting obligations.

6.1.3 Pioneer archives personal information according to the minimum period required by law and regulatory standards. Information is not kept for longer than necessary.

6.1.4 Information is stored securely via both physical and electronic systems that have limited authorised access.

6.1.4.1 Physical records are placed in secure filing cabinets, with access-control.

6.1.4.2 Electronic records are stored within secure servers with multi-factor authentication and restricted access permissions, with regular backups.

6.2 Providing Access to Records

6.2.1 Pioneer reviews formal written requests for access to records via the requests forms.

6.2.2 Pioneer arranges for the individual to view their personal information as requested.

6.2.3 Pioneer updates personal information according to any requests made.

6.2.4 Pioneer keeps all documentation relating to access to records.

6.2.5 Information may be shared with external parties under the following circumstances:

6.2.5.1 Government entities, in emergency situations or where there is a legal requirement to share personal information about the event.

6.2.5.2 Service providers, who provide educational services.

6.2.5.3 Accrediting bodies, where there is a requirement to provide certain personal information.

6.2.5.4 NCVER, for the purposes of populating authenticated VET transcripts, facilitating statistics and research relating to education, pre-populating RTO student enrolment forms, understanding the operations of the VET market for policy and planning, and administering VET through program administration, regulation, monitoring and evaluation.

6.2.6 Students and staff have the right to access their personal information and request corrections to their personal information in accordance with the Privacy Act 1988.

6.2.7 Pioneer provides a response to any requests of records access or correction within a reasonable timeframe. If the request has been refused for legitimate reason, a written statement outlining the reasons for refusal will be provided to the individual.

6.3 Data Security

6.3.1 Pioneer takes data security seriously and takes all reasonable steps to protect personal and sensitive information. Pioneer has implemented the following measures to ensure data security:

6.3.1.1 All personal information being kept on secure servers with multi-factor authentication.

6.3.1.2 Paper records are stored in filing cabinets in access-controlled offices under lock and key.

6.3.1.3 Only authorised personnel may access secure storage areas or electronic systems.

6.3.1.4 Electronic records are maintained within Pioneer's Learning Management System (LMS) and cloud storage.

6.3.1.5 Electronic systems are password protected with restrictive access, based on staff roles.

6.3.1.6 Staff are required to use unique login credentials, with password sharing prohibited.

6.3.1.7 Information shared with third parties is done via secure transfer methods.

6.3.1.8 Pioneer provides staff with their own laptops for secure completion of work duties, that is password protected and maintained up-to-date for work purposes.

6.3.1.9 If there has been a suspected or actual data breach, this is reported immediately to senior management. A risk assessment will then be completed as soon as practicable, and within 30 days, to determine whether the breach is an eligible data breach. Where it is an eligible data breach, Pioneer will notify the affected individuals and the Office of the Australian Information Commissioner (OAIC) as required under the Notifiable Data Breaches scheme.

6.3.1.10 Records are kept for as long as required under legislation. At the end of their retention period, they are securely destroyed through either permanent deletion or shredding.

6.4 Privacy and International Students

6.4.1 Pioneer is committed to protecting the privacy of all students, including those on student visas.

6.4.2 In addition to the standard information collected from students, international students may be required to provide:

6.4.2.1 Passport and visa details.

6.4.2.2 Overseas Student Health Cover (OSHC) information.

6.4.2.3 Emergency contact information, including overseas contacts.

6.4.2.4 Academic transcripts and qualifications, including English language proficiency evidence.

6.4.3 International student information is collected by Pioneer to:

6.4.3.1 Confirm identity, enrolment and visa compliance.

6.4.3.2 Meet CRICOS reporting obligations.

6.4.3.3 Provide necessary support services.

6.4.3.4 Ensure compliance with student visa conditions.

6.4.4 Under the ESOS Act and the National Code, Pioneer is required to provide certain information about international students to Australian Government agencies for student visa monitoring and compliance purposes.

6.4.5 Students acknowledge that through signing the written agreement via enrolment that they understand the requirements outlined in the privacy policy and what information may be collected or shared of them as required by law.

7. Policy Review

7.1 Policy review is undertaken by the CEO with input from relevant staff.

7.2 Policy reviews are identified by an annual review cycle, or through audit and continuous improvement activities. An earlier review may occur if legislative or regulatory changes occur, or if a significant incident or near miss occurs.

7.3 The CEO actions the changes and updates the policies and associated procedures manual accordingly.

7.4 The CEO communicates amendments to policies and associated procedures to all relevant staff via email and/ or staff meetings.

7.5 Changes will be recorded in the updated version control and Document History.

8. Responsibilities

8.1 The CEO/ PEO is responsible for, but not limited to:

8.1.1 Holding ultimate accountability for compliance with the Privacy Act 1988 and other relevant legislation.

8.1.2 Ensuring adequate resources are in place to protect personal information.

8.1.3 Approves the privacy policy and any significant changes.

8.1.4 Acts as escalation point for serious breaches of privacy or complaints.

8.2 The Academic Manager/ Trainer Co-ordinator is responsible for, but not limited to:

8.2.1 Ensuring privacy at all times and consulting staff on procedures.

8.2.2 Ensuring student academic records are maintained accurately and securely.

8.2.3 Restricting access to academic records to authorised personnel only.

8.3 The Compliance Team is responsible for, but not limited to:

8.3.1 Monitoring compliance with privacy legislation, ESOS requirements, and the Standards for RTOs.

8.3.2 Providing guidance to staff on the handling of personal information.

8.3.3 Overseeing the secure collection, use and disclosure of personal information.

8.3.4 Managing privacy complaints.

8.3.5 Conducting regular audits of data management practices.

8.4 Trainers and Assessors are responsible for, but not limited to:

8.4.1 Collecting only the necessary information for training and assessment purposes.

8.4.2 Ensuring assessment evidence and student submissions and results are kept secure.

8.4.3 Reporting any accidental loss of student information to the Academic Manager/ Trainer Co-ordinator.

8.5 The Administration and Student Support Officer are responsible for, but not limited to:

8.5.1 Processing all personal information and providing access to records as required.

8.5.2 Collecting enrolment and support-related personal information in line with policy.

8.5.3 Ensuring records are entered accurately into the LMS.

8.5.4 Providing students with access to the Privacy Policy and Privacy Statement upon request.

8.5.5 Maintaining confidentiality when handling student enquiries, complaints or welfare information.

8.5.6 Ensuring electronic systems are maintained and kept secure.

8.6 Agents and Third Parties are responsible for, but not limited to:

8.6.1 Collecting and handling student information in accordance with Pioneer's policies and the Privacy Act.

8.6.2 Providing students with accurate information when collecting their personal data.

8.6.3 Transferring student information to Pioneer securely.

8.6.4 Complying with contractual requirements relating to privacy and confidentiality.

8.7 The Marketing Executive and other Marketing staff are responsible for, but not limited to:

8.7.1 Ensuring all marketing and promotional activities comply with the Privacy Act and Pioneer's privacy policy and procedures.

8.7.2 Collect and use personal information only for the purposes for which it was provided.

8.7.3 Ensure consent is obtained before using student information in marketing materials.

8.7.4 Work with Compliance to ensure that all marketing channels reflect Pioneer's approved scope of registration and have accurate details.

8.7.5 Take reasonable steps to ensure student and agent information is stored in secure databases, and are not shared with unauthorised parties.

8.8 All staff and contractors are responsible for, but not limited to:

8.8.1 Complying with Pioneer's policies and procedures.
8.8.2 Only collecting, accessing or disclosing personal information necessary for work duties.
8.8.3 Maintaining confidentiality of student and staff information at all times.
8.8.4 Reporting suspected privacy breaches to senior management immediately.

Any complaints or breaches in relation to this document should be reported to the Chief Executive Officer in person or by email to: ceo@pioneercollege.edu.au

Document History:

Version No.	Issue date	Nature of Amendment	Approved By
1.0	1 Jul 2025	*As per implementation of the Revised 2025 Standards for RTOs, all related documentation is reset to version 1.0 to reflect alignment with the updated regulatory framework.* Creation of Document.	CEO
1.1	21 Aug 2025	Document edited.	CEO
1.2	16 Sep 2025	Finalisation of document.	CEO
1.3	16 Jul 2026	Review made. Minor updates to cover page and formatting. Footnote added.	CEO
1.4	03 Sep 2026	Minor changes have been made.	CEO

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