

RTO	Builders Academy Australia (RTO ID 21583)
Type	Public
Applicable standards	Standards for Registered Training Organisations 2025 State and Territory Funding contracts Higher Education Support Act 2003 Australian Privacy Principles (APP) 2014 The Privacy Act 1988 (Commonwealth) Privacy Amendment (Enhancing Privacy Protection) Act 2012 Student Identifiers Regulation 2014 Identity Verification Services Act 2023 (Cth)
Authorised by	General Manager - Quality, Education and Compliance
Effective Date	1 July 2025
Version	V3.0

Policy: Student Privacy

Overview

Builders Academy Australia (BAA) is required to collect, use, store and disclose a range of personal information on students, employees, and a range of other stakeholders. BAA complies with the Privacy Act 1988 (Cth), including the 13 Australian Privacy Principles (APP) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth). BAA is committed to maintaining the privacy and confidentiality of its RTO personnel, RTO contractors, third party and participant records.

This Policy specifically relates to the privacy of student, employer and other groups or individuals in the relation of training and / or assessment services. As such, this Policy applies to all staff, contractors and other third parties which may be privy to sensitive information covered by the APP.

Alignment with Standards for RTOs 2025

This policy supports compliance with the Standards for RTOs 2025, particularly the following clauses from the Compliance Standards:

- **Clause 3.1:** Ensuring student records are securely maintained and accessible to support enrolment, training, and assessment outcomes.
- **Clause 7.1:** Ensuring students are aware of their privacy rights, and enabling complaints and feedback mechanisms regarding the handling of personal data.
- **Clause 8.2:** Maintaining evidence of compliance through secure and retrievable recordkeeping practices.

This policy is reviewed annually and updated in response to legislative or operational changes and feedback from staff, students, and external stakeholders.

What is the APP?

In 2014, the APP replaced the National Privacy Principles (NPP). The APP broadly covers a range of private information that BAA may obtain in the course of our normal duties. For our purposes, these include, but are not limited to:

Student

1. Student identifiers (name, date of birth, student numbers, unique student identifiers (USI), State and Territory Student Identifiers and Apprenticeship / Traineeship Contract IDs.
2. Student contact details (phone, address, email, fax etc.).
3. Information such as disabilities, illness, language, literacy or numeracy challenges, and other sensitive information.
4. Student IDs such as Medicare cards, drivers license, concession cards etc. for the purpose of identifying eligibility for courses and / or funding.
5. Student residency and or citizenship status for the purpose of identifying eligibility for courses and or funding.
6. Copies of student transcripts from other education institutes for determining eligibility for course and / or credit transfers.
7. Third party reports regarding on-the-job performance for employers; and
8. Assessment results

Employer/Third Parties

1. Commercially sensitive information about employers and other third parties; and
2. Employer/Third Parties contact details (Phone, address, email, fax, etc.)

Through this policy BAA seek to ensure that you will be able to deal with the Registered Training Organisation (RTO) in confidence that personal information is only used by the organisation in the ways that are legal, ethical, and secure.

BAA will only collect personal information from individuals by fair and lawful means which is necessary for the functions of BAA. BAA will only collect sensitive information with the consent of the individual and if that information is reasonably necessary for the functions of BAA. By entering into an enrolment contract, individuals provide informed consent for Builders Academy Australia (BAA) to collect, store, and disclose personal information as outlined in this policy.

Where BAA collects personal information from third parties—such as employers, job services providers, or via the Digital Verification Service—students will be informed at the time of enrolment or via direct communication.

For use of images, video, or personal details on public platforms (including social media), BAA will obtain **express written consent** outlining the potential for international access and advising students of the associated risks.

The information requested from individuals by BAA will only be used to provide details of study opportunities, to enable efficient course administration, to maintain proper academic records, to assess an individual's entitlement to state or territory government funded courses, to apply for with permission or check a Unique Student Identifier and to report to government agencies as required by law. If an individual chooses not to give BAA certain information, then BAA may be unable to enrol that person in a course or supply them with appropriate information.

Who we Disclose Student Information to:

Broadly speaking, we will only disclose information to the following persons:

- To you the student.
- To relevant State / Territory and Federal education and funding Government bodies. By entering into an enrolment contract, Students consent for this information to be disclosed.

- To your employer if you are an apprentice or trainee, or your employer is paying for the cost of your course directly to BAA.
- To a third party who is paying for your course (as nominated on the Authority to Invoice form).
- To your legal guardian or parent if you under 18.
- To other persons as directed by you.
- To other persons where you have provided verbal or written consent for us to do so.
- Where directed by law to release information.

Government Bodies

Personal information about students studying with BAA may be shared with the Australian Government, State and Territory Governments and designated authorities, including the Australian Skills Quality Authority (ASQA). This information includes personal and contact details, course and unit enrolment details and changes.

BAA will not disclose an individual's personal information to another person or organisation unless:

- a) the individual concerned is reasonably likely to have been aware or made aware that information of that kind is usually passed to that person or organisation
- b) the individual concerned has given written consent to the disclosure.
- c) BAA 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 individual concerned or of another person.
- d) the disclosure is required or authorised by or under law OR
- e) 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.

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, BAA shall include in the record containing that information a note of the disclosure. Any person or organisation that collects information on behalf of BAA or to whom personal information is disclosed as described in this procedure will be required to not use or disclose the information for a purpose other than the purpose for which the information was collected by them or supplied to them.

Digital Verification Services (DVS) via Green ID

As part of our compliance with regulatory requirements, we are legally obligated to verify the identity of our students. To meet this obligation efficiently and securely, we utilise the Australian Government's Digital Verification Service (DVS) through the Green ID Gateway Service. This section outlines the purpose of identity verification, how your information is handled, and your rights as a student.

1. Our Legal Obligations for Identity Verification

As a Registered Training Organisation (RTO), we are required to verify the identity of individuals enrolling in nationally recognised training and seeking government funding. This verification helps ensure that we satisfy the conditions set by government-funded training programs, including proof of citizenship or residency.

The identification information we are required to verify include, but is not limited to Government-issued identification such as a driver's licence, Medicare card, passport, or birth certificate.

2. What is the Digital Verification Service (DVS)?

The Digital Verification Service (DVS) is a secure, electronic identity verification system that allows us to verify your identity in real time. This service uses information from official government records to ensure that the personal information you provide to us is accurate and valid.

We use Green ID as a gateway service to connect with the DVS. Green ID is a trusted third-party provider that facilitates the process of identity verification, enabling us to authenticate your identity efficiently.

3. Due Diligence and Data Security Measures

BAA maintains a written agreement with Green ID (Equifax Pty Ltd), the third-party provider facilitating access to the DVS, ensuring that all data processing is consistent with the Australian Privacy Principles (APPs).

The agreement includes provisions for:

- Limiting the use of personal data to identity verification only;
- Immediate disposal of personal data post-verification; and
- Data breach notification requirements in line with the **Notifiable Data Breaches Scheme**. BAA reviews these arrangements annually as part of its third-party provider compliance checks.

4. Data Handling and Privacy: No Retention of Personal Data by Green ID

When you submit your identity documents for verification:

- Your data is securely transmitted through Green ID to the DVS;
- **Green ID does not store, retain, or share your personal information** after the verification process is completed;
- The data is used solely for the purpose of verifying your identity;
- We retain only the minimum necessary information to demonstrate that identity verification has been completed (e.g., confirmation of a match), in compliance with our regulatory obligations.

All data handling is done in accordance with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (APPs), ensuring that your personal information is protected at all times.

5. Alternative Methods for Identity Verification

While the DVS via Green ID provides a fast and secure method of verifying your identity, we understand that not all students may wish to use this service. If you prefer not to use the DVS, we offer alternative methods for verifying your identity. These options may include, but are not limited to:

- **In-person verification** at our campus or designated office, where original documents can be sighted and verified by authorised staff;
- **Secure upload of certified copies** of your identification documents by email (with appropriate encryption and privacy safeguards);
- Other reasonable and secure methods as agreed upon, in compliance with our legal obligations.

These alternatives are available to ensure your comfort and privacy preferences are respected while still meeting our legal and operational requirements.

6. Your Rights and Contact Information

You have the right to choose the method of identity verification that best suits you. If you have any concerns about using the DVS or Green ID, or if you prefer to use an alternative verification method,

please feel free to contact our team. We are happy to assist you in selecting the verification option that works for you.

The Following Outlines How We Apply Each Privacy Principle:

APP 1	Open and Transparent Management of Personal Information	<ul style="list-style-type: none"> ➤ We publish this policy on our website: www.buildersacademy.com.au. ➤ A link to this policy is included in our student handbooks. ➤ BAA outlines what information is collected and what it will be used for, what information will be released and under what conditions.
APP 2	Anonymity and Pseudonymity	<ul style="list-style-type: none"> ➤ Individuals can remain anonymous for the purpose of requesting general information on a course, website enquiries or anonymous complaints/feedback. ➤ Individuals who wish to undertake nationally recognised training with BAA will be required to disclose information of a personal nature as outlined in this policy. ➤ Students who wish to provide feedback on our courses or services may do so anonymously.
APP 3	Collection of Solicited Personal Information	<ul style="list-style-type: none"> ➤ BAA will collect information you provide on enrolment into a nationally accredited course or on commencement of employment with BAA. We may also collect information you provide on websites, enrolment forms, course materials and assessments. ➤ BAA may sometimes collect information, with your consent, from your employer, a job services provider, or other organisations where students may engage in placement for training and assessment purposes. ➤ BAA collects information of a personal and sometimes sensitive nature. Information BAA collects may include: full name, date of birth, residential address, contact details, demographic information, ability/disability, employment details, educational background, indigenous background, concession status language, literacy and numeracy skills and educational/course progress. BAA may also collect information on your next of kin or parent/guardian for emergency purposes.
APP 4	Dealing with Unsolicited Personal Information	<ul style="list-style-type: none"> ➤ BAA only collects uses and stores information which is directly related to the provision of training and assessment (for students) and information directly related to the employment or engagement of contractors (for employees and contractors). ➤ Information which is received that is not related to training and assessment or employment with BAA is destroyed in a safe and secure manner.
APP 5	Notification of The Collection of Personal Information	<ul style="list-style-type: none"> ➤ Students and employees are notified when information is collected or sourced from third parties. Such notifications are expressed in enrolment forms, assessment tools and other written documents or implied in such circumstances such as workplace

		observations.
APP 6	Use or Disclosure of Personal Information	<ul style="list-style-type: none"> ➤ BAA only uses information for the provision of training and assessment BAA only discloses information to 3rd parties such as: <ul style="list-style-type: none"> i. Relevant Government bodies ii. Apprenticeship Centres – where a student is a trainee or apprentice iii. Employers – where a student is a trainee or apprentice or when an employer has paid for the provision of training iv. Job Services Providers – where you have been referred by a Job Service Provider v. External auditors and our consultants vi. Parent/Guardian – where a student is under the age of 18 vii. Other entities required by law
APP 7	Direct Marketing	<ul style="list-style-type: none"> ➤ Your personal information will never be sold to any marketing company or third party. ➤ BAA may use your personal information to market directly to you only for the provision of further training and assessment with the RTO. ➤ BAA will only use your information if you have provided consent to use your information for this purpose and you have opted-in to this type of communication. ➤ BAA will provide an 'opt out' option for receiving direct marketing.
App 8	Cross-Border Disclosure of Personal Information	<ul style="list-style-type: none"> ➤ BAA will not disclose your personal information to any entity outside of Australia unless you have provided your express written consent. ➤ All records will be kept in Australia. ➤ Students who agree for BAA to use their personal information such as name and images for marketing purposes via social media platforms are advised of the possibility of their information being accessed by individuals overseas.
APP 9	Adoption, Use or Disclosure of Government Related Identifiers	<ul style="list-style-type: none"> ➤ BAA is required to collect, in some circumstances, government related identifiers. BAA will not use these identifiers for any reason or purpose except for the explicit reason it is required (e.g., Concession numbers, USI, Drivers License Number, etc.) and will not use these numbers as an identifier of individuals. ➤ BAA will only disclose government related identifiers where required by law or express consent has been given to disclose this information.
APP 10	Quality of Personal Information	<ul style="list-style-type: none"> ➤ BAA collects information and ensures it is accurate, up to date and complete. ➤ BAA will take all reasonable steps to ensure that the information provided from individuals is correct and any third-party information received can be verified for

		accuracy, currency, and completeness.
APP 11	Security of Personal Information	<ul style="list-style-type: none"> ➤ All personal and sensitive information is kept safe and secure at all times, only authorised BAA staff may access this information. ➤ Destruction of personal and sensitive information is carried out by commercial document destruction companies or secure shredding or secure electronic deletion.
APP 12	Access to Personal Information	<ul style="list-style-type: none"> ➤ Individuals may request copies of information which is kept about them at any time. ➤ BAA will not release personal information to a third party unless they are authorised to do so. ➤ When requesting personal information, the individual will need to be able to adequately identify themselves. ➤ The timeframe for granting access will vary according to the nature of the request, who is requesting the information and how the information is requested to be given. For example, information requested by a phone call will generally be given during the call if the caller's identity can clearly be established and the requestor is wanting information verbally. More complex requests may take longer. Please allow 5-10 working days. Where we are unable to respond to a request within this time frame, we will advise you.
APP 13	Correction of Personal Information	<ul style="list-style-type: none"> ➤ Individuals who feel that the information BAA uses, and stores is inaccurate, or incomplete may request to have the information updated and corrected. Such corrections must be in writing to: enquiries@buildersacademy.com.au mailto:privacy@buildersacademy.com.au

Responsible Parties and Review Information

Privacy Compliance Training

All BAA staff must undertake privacy training:

1. Upon commencement of employment for staff who handle personal information or access the DVS.
2. At least every two years thereafter for those same staff members.
3. **Immediately** if there are:
 - Significant changes to the **Privacy Act**, **APPs**, or **identity verification requirements**
 - Changes to **internal systems** used for DVS access
 - A privacy breach involving identity information
4. When directed.

As BAA is a member of UP Education, the HR department may direct all staff within the group to undertake general privacy training. This is at the discretion of the HR department.

BAA will also require staff to undertake privacy training specific to working in an RTO and to their role and the type of student information that they are privy to.

The following table outlines the broad kinds of privacy training that is undertaken by BAA staff:

Training Type	Topics Covered	Delivery Method
Induction / Refresher Privacy Training directed by HR Department	An overview of: <ul style="list-style-type: none"> • Australian Privacy Principles (APP) • Australian Privacy Act 1988 	Online via UP Education Personal Learner Management System May also be delivered face-to-face by: <ul style="list-style-type: none"> • HR Staff • Legal Staff • External privacy experts
Dedicated Privacy Training specific to BAA	Privacy training will generally cover the following topics: <ul style="list-style-type: none"> • Australian Privacy Principles (APP) • Australian Privacy Act 1988 – Overview • How privacy standards apply to RTOs and individual roles • Relevant BAA forms, privacy declarations and consent forms 	This training is role specific and will vary according to the needs of the role the staff member is undertaking. This training may be delivered by a live online webinar accessed through live webinar technology, a recorded webinar accessed through the BAA Learner Management System, or face-to-face. Live sessions may be delivered by: <ul style="list-style-type: none"> • A member of the Compliance Team • The staff member's Team Leader or Manager

DVS / Green ID Privacy Training	Comprehensive training on the legal basis for identity verification, operational use of the Digital Verification Service (DVS), secure integration with Green ID, obtaining and documenting informed consent, procedures for handling and verifying ID documents, secure transmission and destruction of personal data, privacy breach response protocols, and obligations under the Identity Verification Services Act 2023	Delivered during staff onboarding and repeated at least every 2 years via LMS modules or live compliance-led sessions; ad hoc training provided after legislative changes or identified breaches Initial on-boarding and refresher every 2 years via LMS or live sessions by Compliance or HR
Embedded within other professional development training	<p>Professional development topics which may involve specific processes and procedures that relate to privacy concerns.</p> <p>Examples of these may include, but are not limited to:</p> <ul style="list-style-type: none"> • Complaints handling and recording training • Training / information sessions on Standards for Registered Training Organisations relating to student and employer data • Training on funding contracts • Training on enrolment processes • Training on archiving processes • Training on databases which contain student and / or employer data 	<p>This training is role specific and will vary according to the needs of the role the staff member is undertaking.</p> <p>This training may be delivered by a live online webinar accessed through live webinar technology, a recorded webinar accessed through the BAA Learner Management System, or face-to-face.</p> <p>Live sessions may be delivered by:</p> <ul style="list-style-type: none"> • A member of the Compliance Team • The staff member's Team Leader or Manager • Another Team Leader, Manager or Senior Staff member as applicable to the topic being delivered.

Additional Privacy Training

Additional privacy training will be delivered to relevant staff when any of the following occurs:

- Amendments to the Privacy Act 1988 (Cth) or the Australian Privacy Principles (APPs);
- Changes to privacy obligations under federal legislation, state/territory funding contracts, or the Identity Verification Services Act 2023 (Cth);
- Implementation of new or revised internal procedures, systems, or forms related to the collection, disclosure, or management of personal information;
- As part of continuous improvement initiatives that affect privacy governance or student/employer data handling;
- Following the identification of a privacy breach or high-risk event requiring targeted mitigation strategies.

Privacy Breach Notification Procedure

In the event of a suspected or actual privacy breach, BAA will take the following steps:

1. **Contain** the breach and secure the information;
 2. **Assess** the nature and extent of the breach within 48 hours;
 3. **Notify** affected individuals and the Office of the Australian Information Commissioner (OAIC) within 72 hours if the breach is likely to result in serious harm;
 4. **Review** internal systems to prevent future occurrences.
- All privacy breaches are documented and reviewed through the Continuous Improvement Register.

Feedback, Complaints and Appeals

If you wish to lodge a complaint about how BAA handles personal information or if you feel that BAA has breached the Privacy Act, we encourage you to let us know as early as possible.

BAA has a Grievance, Complaints and Appeals Policy that outlines how to provide informal feedback or lodge a formal complaint or appeal. This policy is available on our website. You may choose to remain anonymous.

We treat all feedback with respect and confidentiality, and we aim to resolve issues promptly, fairly, and in a culturally safe manner, accessible to all students and protects students who raise issues. Students may also contact Student Services or their Student Success Coach for assistance in accessing the process.

Our Grievance, Complaints and Appeals Policy is located on the following webpage:

<https://buildersacademy.edu.au/baa-academy-links-and-documents/>

Monitoring and Review

This policy is maintained under version control to ensure it remains accurate, relevant, and compliant with all applicable requirements.

It will be formally reviewed on an annual basis by the Compliance Team, in consultation with relevant stakeholders, including Student Support, Training Operations, and Senior Management.

Reviews will ensure that the policy continues to meet the requirements of the Standards for RTOs 2025, Government contracts, and other regulatory or quality frameworks.

In addition to scheduled reviews, this document may be updated earlier in response to:

- Changes in legislation, regulatory standards, or contractual obligations;
- Internal audits or findings from complaints, appeals, or investigations;
- Feedback from students, staff, or third parties that identifies a need for improvement;
- Organisational restructuring or operational changes that affect policy content.

Where relevant, students and stakeholders will be notified of significant changes via internal communications, staff briefings, or updates to the Student Handbook or website.

Accessibility of Information

BAA is committed to providing support information in accessible formats for students (e.g., plain English, large print, accessible PDFs, translated materials, and formats for assistive technology users).

If required, please speak with your Student Success Coach or Student Services team so we can offer the right support in getting information in an accessible format for you.

We acknowledge the Traditional Custodians of the lands we live on. We pay our respects to all Elders, past and present, of all Aboriginal and Torres Strait Islander nations.

Appendix – Australian Privacy Principles (APP) Compliance Summary Table

APP No.	Privacy Principle	BAA Compliance Summary
APP 1	Open and Transparent Management	Privacy Policy is published online and linked in student handbooks.
APP 2	Anonymity and Pseudonymity	Anonymous feedback and general enquiries are accepted; identity required for enrolment.
APP 3	Collection of Solicited Personal Information	Collected through enrolment forms, assessments, and authorised third parties with student consent.
APP 4	Dealing with Unsolicited Personal Info	Unsolicited data not required for training/employment is securely destroyed.
APP 5	Notification of Collection	Notification included in enrolment forms, assessments, and verbally where relevant.
APP 6	Use or Disclosure of Personal Information	Disclosed only with consent or legal requirement (e.g. employers, government bodies, parents/guardians).
APP 7	Direct Marketing	Used only for BAA courses; opt-in required; opt-out always available.
APP 8	Cross-Border Disclosure	Express written consent required; marketing examples include social media with international visibility.
APP 9	Adoption of Government Identifiers	Used only for specific legal purposes (e.g. USI, concession checks); not used as personal identifiers.
APP 10	Quality of Personal Information	Regularly validated and updated through student and third-party input.
APP 11	Security of Personal Information	Secured via access controls, physical and digital safeguards, and secure destruction.
APP 12	Access to Personal Information	Requests handled within 10 business days; identity verification required.
APP 13	Correction of Personal Information	Correction requests accepted in writing and actioned within a reasonable timeframe.