

References

RTO Standards 2025 (Compliance Standards - Integrity of Nationally Recognised Training Products)
Privacy Act 1988 (Cth)
Australian Privacy Principles (APPs)
National Vocational Education and Training Regulator Act 2011 (NVETR Act)
National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020
Education Services for Overseas Students Act 2000 (ESOS Act)
National Code of Practice for Providers of Education and Training to Overseas Students 2018
Student Identifiers Act 2014
ELICOS Standards 2018
ICQA POL 0093 - Records Retention and Management Policy
ICQA POL 0320 - PRISMS Reporting Procedure
ICQA POL 0229 - Complaints and Appeals Policy
eSkilled SMS User Guide

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Approved by: CEO

Responsible Officer: Compliance Manager

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CRICOS Provider Code: 01351B

Purpose

This Privacy Policy outlines how International College of Queensland Australia Pty Ltd (ICQA) collects, uses, stores, discloses, and protects personal and sensitive information in compliance with Australian privacy legislation and regulatory requirements.

This policy ensures ICQA meets its obligations as:

- A Registered Training Organisation (RTO) regulated by the Australian Skills Quality Authority (ASQA) under the RTO Standards 2025
- A CRICOS provider (Code: 01351B) for international students under the ESOS Act 2000 and National Code 2018
- An ELICOS provider under the ELICOS Standards 2018

ICQA is committed to maintaining the highest standards of data protection, transparency, and respect for student privacy rights.

Scope

This policy applies to:

- All students enrolled in ICQA courses including VET qualifications, CRICOS programs, and ELICOS courses
- All personal and sensitive information collected, used, stored, and disclosed by ICQA
- All ICQA staff, trainers, assessors, contractors, education agents, and third-party providers who handle student information
- All systems and processes including the Student Management System (eSkilled SMS), PRISMS, learning management systems, and related platforms
- All stages of the student lifecycle from initial enquiry through marketing, recruitment, enrolment, training delivery, assessment, certification, and alumni communications

Definitions

- **Personal Information:** Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether recorded in a material form or not. Examples include name, address, email, phone number, date of birth, and student ID.
- **Sensitive Information:** A subset of personal information that includes information about racial or ethnic origin, political opinions, religious beliefs, sexual orientation, criminal records, health information, biometric data, and membership of professional or trade associations.
- **eSkilled SMS:** ICQA's Student Management System - the primary database used to collect, store, and manage all student data, training records, attendance, assessment outcomes, and certification.
- **PRISMS:** Provider Registration and International Student Management System - the national database managed by the Department of Education for reporting CRICOS student enrolments, course progress, and visa compliance matters.
- **NCVER:** National Centre for Vocational Education Research - the national body responsible for collecting, managing, and analyzing Australian VET sector data.
- **USI:** Unique Student Identifier - a nationally recognized reference number that creates a secure online record of a student's VET training and qualifications.
- **CRICOS:** Commonwealth Register of Institutions and Courses for Overseas Students - the register of Australian education providers authorized to enroll international students.
- **Third Party:** Any organization or individual engaged by ICQA to provide services, including but not limited to IT service providers, compliance consultants, education agents, training partners, and contracted assessors.

Policy Statement

ICQA is committed to protecting the privacy of all students and complying with:

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- RTO Standards 2025
- ESOS Act 2000 and National Code 2018
- All relevant VET, CRICOS, and ELICOS legislation

ICQA will:

- Collect personal information only for legitimate educational, administrative, and regulatory purposes
- Use and disclose information only as authorized by law or with student consent
- Store information securely using appropriate technical and physical safeguards
- Provide transparent information about privacy practices
- Respect student rights to access, correct, and complain about privacy matters
- Train all staff and third parties in privacy obligations
- Conduct regular privacy audits and continuous improvement activities

Collection Of Personal Information

1.1 Purpose of Collection

ICQA collects personal information necessary to:

- Process and manage student enquiries and enrolments
- Deliver training, assessment, and educational services
- Monitor academic progress, attendance, and course completion
- Issue AQF qualifications, Statements of Attainment, and ELICOS Certificates of Achievement
- Provide student support services including academic assistance, welfare support, and LLN services
- Administer complaints, appeals, and refund processes
- Meet regulatory reporting obligations to ASQA, Department of Home Affairs, NCVER, and other authorities
- Manage CRICOS compliance including visa monitoring and PRISMS reporting
- Process fee payments and maintain financial records
- Communicate with students about their studies, important notices, and opportunities
- Conduct quality assurance, research, and continuous improvement activities
- Maintain accurate records as required by law

1.2 Types of Information Collected

Personal information collected by ICQA includes:

Personal Details:

- Full legal name (as per passport/identification)
- Preferred name and title
- Date of birth
- Gender
- Country of birth and citizenship
- Primary language and proficiency level

Contact Information:

- Residential and postal addresses
- Email addresses (personal and/or work)
- Mobile and home telephone numbers
- Emergency contact details (names, relationships, phone numbers)

Educational and Training Records:

- Unique Student Identifier (USI)
- Previous qualifications and transcripts
- Enrollment details and course selection
- Training plans and schedules
- Assessment submissions, results, and feedback
- Attendance records
- Course progress reports
- Recognition of Prior Learning (RPL) evidence
- Credit transfer documentation
- Certificates and Statements of Attainment issued

International Student Information (CRICOS):

- Passport details
- Visa type, grant number, and expiry date
- Overseas Student Health Cover (OSHC) details
- Intended address in Australia
- Education agent information (if applicable)
- English language proficiency test results
- Course progress and attendance monitoring data
- Provider default or student default information

Support and Welfare Information:

- Language, Literacy, and Numeracy (LLN) assessment results
- Disability or medical conditions requiring reasonable adjustments (disclosed voluntarily)
- Welfare and counseling referral information

- Accommodation and support service needs

Financial Information:

- Fee structure and payment plans
- Payment receipts and refund records
- Scholarship or financial assistance details
- Banking details for refund processing

Employment Information (where relevant):

- Employer details for workplace training
- Employment status for statistical reporting
- Job network provider information (if applicable)

Images and Media:

- Photographs for student ID cards
- Video recordings for assessment purposes (e.g., presentations, practical demonstrations)
- Images or videos for promotional materials (with explicit consent)

1.3 How Information is Collected

Personal information is collected through:

- Enquiry forms on the ICQA website
- Enrolment Application Forms for CRICOS and ELICOS programs
- Recognition of Prior Learning (RPL) Application Forms
- Credit Transfer Application Forms
- Pre-training reviews and LLN assessments
- Assessment submissions (written, practical, online)
- Observation checklists and workplace assessment records
- Attendance registers and learning platform activity logs
- Student surveys, feedback forms, and quality indicator surveys
- Complaints and appeals documentation
- Interviews for RPL or course counseling
- Third parties (with student consent):
 - o Education agents
 - o Previous RTOs or educational institutions
 - o Employers (for traineeship or apprenticeship programs)
 - o Job network providers
 - o Department of Home Affairs (visa verification)
- Publicly available sources (e.g., professional licensing registers for verification purposes)

Important: Students are informed at the point of collection about why information is being collected, how it will be used, who will have access, and the consequences of not providing information (e.g., inability to process enrolment or issue qualifications).

USE AND DISCLOSURE OF PERSONAL INFORMATION

2.1 Primary Uses

Student personal information is used to:

- Create and maintain student records in eSkilled SMS
- Deliver training and conduct assessments aligned with Training Packages, Accredited Courses, and ELICOS curricula
- Monitor academic progress, attendance, and support needs
- Issue AQF qualifications, Statements of Attainment, and ELICOS Certificates
- Communicate with students about timetables, assessment deadlines, results, and important notices
- Provide student support services (academic tutoring, LLN support, welfare assistance, career counseling)
- Manage complaints, appeals, and refund requests
- Process fee payments and financial transactions
- Verify student identity and eligibility for enrolment
- Comply with legal and regulatory obligations
- Conduct internal quality assurance and continuous improvement
- Generate reports for management and governance purposes

2.2 Mandatory Disclosures to Government Bodies

Under Australian law, ICQA is required to disclose student information to government bodies and regulatory authorities.

2.2.1 National Centre for Vocational Education Research (NCVER)

Under the National Vocational Education and Training Regulator Act 2011 and the NVETR (Data Provision Requirements) Instrument 2020, ICQA must disclose student personal information to NCVER.

NCVER is responsible for collecting, managing, analysing, and communicating research and statistics about Australia's VET sector.

NCVER collects, holds, uses, and discloses personal information in accordance with the Privacy Act 1988 and NVETR Act 2011 for purposes including:

- Populating authenticated VET transcripts
- Administering vocational education and training programs, including regulation, monitoring, and evaluation
- Facilitating education statistics and research, including surveys and data linkage
- Understanding the VET market for policy development, workforce planning, and consumer information

NCVER may disclose personal information to:

- Department of Employment and Workplace Relations (DEWR)
- Commonwealth authorities
- State and Territory training authorities (other than RTOs)
- VET regulators
- Persons engaged by NCVER to conduct research on its behalf

NCVER does not intend to disclose personal information to overseas recipients.

Students may be contacted to participate in VET surveys conducted by NCVER, government departments, or authorized contractors. Students have the right to opt out of surveys at the time of contact.

For more information about how NCVER handles personal information, visit:

<https://www.ncver.edu.au/privacy>

2.2.2 Australian Skills Quality Authority (ASQA)

ICQA discloses student information to ASQA as Australia's national VET regulator for purposes including:

- Compliance monitoring and audit activities
- Investigating complaints about RTOs
- Assessing RTO performance against the RTO Standards 2025
- Regulatory reporting and data collection
- Issuing or verifying AQF qualifications and Statements of Attainment

2.2.3 Department of Home Affairs (CRICOS Students)

For international students enrolled in CRICOS courses, ICQA reports student information through PRISMS to the Department of Home Affairs for visa compliance purposes, including:

- Confirmation of Enrolment (CoE) issuance and cancellation
- Course progress concerns (failing to meet course progress requirements)
- Attendance concerns (failing to maintain 80% attendance)
- Course changes, deferrals, suspensions, or cancellations
- Provider default or student default situations
- Completion of studies
- Breaches of visa conditions

This reporting is mandatory under the ESOS Act 2000 and National Code 2018.

2.2.4 State and Territory Training Authorities

ICQA may disclose student information to State and Territory training authorities for:

- Funding eligibility verification and administration
- State-based VET program monitoring
- Regulatory compliance in states where ICQA operates

2.2.5 Tuition Protection Service (TPS)

In the event of provider default, ICQA discloses student information to the TPS to:

- Facilitate course placements with alternative providers
- Process tuition fee refunds for affected students

2.3 Disclosures with Student Consent

ICQA may disclose student information to third parties with written student consent

2.4 Third-Party Service Providers

ICQA engages third-party service providers for specific operational purposes with appropriate privacy safeguards

DATA STORAGE AND SECURITY

ICQA implements comprehensive security measures to protect student information

RETENTION AND DISPOSAL

Student records retained for 30 years in accordance with RTO Standards 2025

STUDENT PRIVACY RIGHTS

Students have rights to access, correct, and complain about privacy matters

UNIQUE STUDENT IDENTIFIER (USI)

USI privacy protections and secure handling procedures

THIRD-PARTY PROVIDERS AND EDUCATION AGENTS

Privacy requirements for third parties and education agents

WEBSITE PRIVACY AND COOKIES

Google Analytics, cookies, and website data collection

OVERSEAS DATA TRANSFERS

Limited international transfers with appropriate safeguards

STAFF RESPONSIBILITIES

Privacy training and staff obligations

PRIVACY BREACH MANAGEMENT

Breach response procedures and notification requirements

POLICY REVIEW

Annual review and continuous improvement

CONTACT INFORMATION

For privacy inquiries:

Compliance Manager
International College of Queensland Australia Pty Ltd
Email: compliance@icqa.edu.au

External Authorities:
Office of the Australian Information Commissioner (OAIC)
Phone: 1300 363 992
Website: www.oaic.gov.au

Overseas Students Ombudsman
Phone: 1300 362 072
Website: www.ombudsman.gov.au

Policy review

The compliance committee or representatives in conjunction with management and human resources will review the procedure annually

Version History

Date	Version	Author	Status	Reviewers
October 2025	1	J Brooks	Approved	R Prasad