

## Privacy Policy

<b>Document Owner</b>	Chief Executive Officer		
<b>Responsible Officer</b>	RTO Manager		
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<b>Related Documents</b>	<i>NCVER Privacy Notice</i> <i>Data and Records Management Policy</i> <i>Complaints and Appeals Policy</i> <i>Student Information Release Form</i> <i>Student Records Request Form</i>		
<b>Version</b>	<b>Authorised by</b>	<b>Approved</b>	<b>Effective Date</b>
2.0	Chief Executive Officer	26/03/2026	26/03/2026

### 1. Context

Barrington Training Services (BTS) is committed to protecting the privacy, confidentiality and security of all personal information it collects, holds and manages in relation to its personnel, participants, clients and stakeholders.

BTS complies with the **Privacy Act 1988 (Cth)**, including the **13 Australian Privacy Principles (APPs)**, as well as any other applicable privacy legislation, regulatory requirements and binding codes in force from time to time. This includes compliance with the **Notifiable Data Breaches (NDB) scheme**, which requires organisations to notify affected individuals and the Office of the Australian Information Commissioner (OAIC) of eligible data breaches that are likely to result in serious harm.

As part of its ongoing risk management and governance framework, BTS has conducted Privacy Impact Assessments (PIAs) across its operations. These assessments identify potential privacy risks and inform the implementation of appropriate mitigation measures. Privacy risks are actively managed at all stages of the information lifecycle, including the collection, use, disclosure, storage, access, correction, de-identification and secure destruction of personal information.

### 2. Definitions

Refer to the [Explanation of Terms](#) document.

### 3. Scope

This Privacy Policy applies to Barrington Training Services (BTS) and governs the management of personal information collected, held and used in the course of its operations.

Barrington Training Services Pty Ltd trading as Be Trained by Barringtons.

RTO code: 91397 ABN: 66 102 353 622

Address: Suite 1, 4 Columbia Court, NORWEST, NSW 2153, Australia

Phone: 02 9899 0600 Email: [enquiries@barringtons.com.au](mailto:enquiries@barringtons.com.au) Website: [www.barringtons.com.au](http://www.barringtons.com.au)

The policy applies to all BTS personnel, participants, clients, contractors and other stakeholders, and to personal information in all formats, including electronic and hard-copy records.

It covers personal information collected directly by BTS or received from third parties for which BTS is responsible for its management. All BTS personnel are required to comply with this policy as part of their roles and responsibilities.

#### 4. Principles

BTS's approach to privacy management is guided by the following Australian Privacy Principles, as set out in the Privacy Act 1988 (Cth):

<b>APP 1</b> – Open and Transparent Management of Personal Information	Requires organisations to manage personal information transparently and maintain a clearly expressed and up-to-date privacy policy.
<b>APP 2</b> – Anonymity and Pseudonymity	Individuals must have the option of not identifying themselves or using a pseudonym, where lawful and practicable.
<b>APP 3</b> – Collection of Solicited Personal Information	Limits the collection of personal information to what is reasonably necessary, and sets higher protections for sensitive information.
<b>APP 4</b> – Dealing with Unsolicited Personal Information	Requires organisations to assess and destroy or de-identify unsolicited personal information unless it may be lawfully retained.
<b>APP 5</b> – Notification of the Collection of Personal Information	Requires organisations to notify individuals about the collection of their personal information and how it will be used.
<b>APP 6</b> – Use or Disclosure of Personal Information	Limits the use and disclosure of personal information to the purpose for which it was collected, unless an exception applies.
<b>APP 7</b> – Direct Marketing	Sets rules for the use of personal information for direct marketing and provides opt-out rights.
<b>APP 8</b> – Cross-Border Disclosure of Personal Information	Requires organisations to take reasonable steps to ensure overseas recipients handle personal information in accordance with Australian privacy law.
<b>APP 9</b> – Adoption, Use or Disclosure of Government-Related Identifiers	Restricts the use and disclosure of government-issued identifiers.
<b>APP 10</b> – Quality of Personal Information	Requires organisations to take reasonable steps to ensure personal information is accurate, up to date and complete.

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<b>APP 11 – Security of Personal Information</b>	Requires reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.
<b>APP 12 – Access to Personal Information</b>	Gives individuals the right to access their personal information, subject to limited exceptions.
<b>APP 13 – Correction of Personal Information</b>	Requires organisations to correct personal information upon request if it is inaccurate, out of date, incomplete or misleading.

## 5. Policy details

This Privacy Policy provides the overarching framework for BTS’s privacy practices. It sets out how BTS manages personal information in a manner that is lawful, fair, transparent and proportionate, and how it embeds privacy-by-design principles into its operational processes and systems.

BTS manages personal information openly and transparently. Through documented policies, procedures, staff training and information systems, BTS ensures compliance with the APPs and any applicable registered APP codes. This includes establishing clear mechanisms to enable individuals to:

- access and correct their personal information;
- make inquiries about how their information is managed; and
- lodge privacy-related complaints, which are handled promptly and in accordance with regulatory requirements.

### 5.1 Open and Transparent Management of Personal Information

#### *Purpose of Collection, Use, Retention and Disclosure*

Barrington Training Services (BTS) collects, holds, uses and discloses personal information in the course of conducting its business activities and delivering services. Personal information is only managed where it is reasonably necessary for BTS’s functions and operations, including but not limited to:

- delivering training and related services;
- managing employees, contractors and business operations;
- promoting BTS products and services;
- meeting stakeholder and contractual requirements; and
- complying with legal and regulatory obligations.

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As a Registered Training Organisation (RTO) regulated by the Australian Skills Quality Authority (ASQA), BTS is required under Commonwealth and State legislation to collect, retain, use and disclose personal and sensitive information relating to participants in nationally recognised training. Key legislative instruments include:

- National Vocational Education and Training Regulator Act 2011;
- Student Identifiers Act 2014;
- Standards for Registered Training Organisations (RTOs) 2025; and
- Data Provision Requirements 2012.

BTS is also subject to applicable State and Territory legislation and funding agreements that impose additional information collection, use and disclosure obligations.

### *Disclosure of Personal Information*

In accordance with legal, regulatory and contractual requirements, BTS may disclose personal information for legitimate purposes to relevant entities, including:

- Commonwealth, State and Local Government agencies;
- Australian Apprenticeship Support Network providers;
- employers, schools, guardians and job service providers; and
- service providers, auditors and background checking agencies.

### *Types of Personal Information Collected*

#### a) Personal Information

Depending on service requirements, BTS may collect:

- contact and identification details;
- employment and educational history;
- demographic data;
- enrolment, participation and assessment outcomes; and
- financial and billing information.

#### b) Sensitive Information

Where required and lawful, BTS may collect sensitive information, including:

- government-issued identifiers;
- health, disability and support needs;
- Indigenous status;
- complaints or incident information; and
- background checks (e.g. National Police or Working With Children Checks).

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Additional safeguards are applied where information relates to children or other vulnerable individuals.

#### *Collection of Personal Information*

BTS generally collects personal information directly from individuals through enrolment forms, online systems, portals and direct communication.

Information may also be received from authorised third parties, including government agencies, employers, schools and service providers, where necessary for service delivery or compliance purposes.

#### *Storage, Security and Destruction*

BTS maintains robust security controls to protect personal information, including:

- secure electronic systems with restricted, role-based access;
- password protection, monitoring and audit controls;
- internal hosting with physical and system security safeguards; and
- backup, virus protection and access monitoring measures.

Paper-based records are securely destroyed as soon as practicable through approved shredding services.

#### *Retention and Disposal*

Personal information is retained in accordance with BTS's **Data and Records Management Policy**, the **Record Retention Matrix** and applicable legislative requirements.

If BTS ceases operations, records relating to nationally recognised training will be transferred to ASQA as required by law.

#### *Access and Correction*

Individuals have the right to request access to, or correction of, their personal information.

Students may request access to their personal records by submitting a written request to the BTS Team, using the **Student Records Request Form**, available on the Student Information page of the BTS website.

Staff may request access to their personnel records by submitting a written request to Human Resources.

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### *Complaints*

Individuals may lodge complaints if they believe BTS has breached the Australian Privacy Principles or a registered APP code. Complaints are managed in accordance with BTS's **Complaints and Appeals Policy**.

### *Overseas Disclosure*

BTS does not generally disclose personal information to overseas recipients.

### *Availability of the Privacy Policy*

This Privacy Policy is freely available on the BTS website and in the BTS policy handbooks. It is provided in accessible formats where reasonably practicable and is available on request at no cost.

### *Review and Updates*

BTS regularly reviews this Privacy Policy:

- on an ongoing basis as laws or operational requirements change;
- annually as part of internal audit processes;
- during external regulatory audits; and
- following privacy-related complaints or incidents.

Updates are communicated to stakeholders through internal communications and publication on the BTS website and relevant client materials.

## **5.2 Anonymity and Pseudonymity**

Where lawful and practicable, BTS allows individuals to interact anonymously or using a pseudonym, particularly for general enquiries. Identification is required where mandated by law, including enrolment in nationally recognised training and AVETMISS reporting obligations.

## **5.3 Collection of Solicited Personal Information**

BTS collects only personal information that is reasonably necessary for its operations. Sensitive information is collected only with consent or where required by law. All information is collected lawfully, fairly and, where possible, directly from the individual.

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#### 5.4 Unsolicited Personal Information

Unsolicited personal information is assessed promptly. Information that could not lawfully have been collected is securely destroyed or de-identified unless retention is required by law.

#### 5.5 Notification of Collection

BTS takes reasonable steps to notify individuals of information collection, including:

- BTS identity and contact details;
- purpose and legal basis for collection;
- consequences of non-provision;
- usual disclosures;
- any overseas disclosures; and
- access, correction and complaint rights.

Where required, BTS ensures individuals acknowledge their understanding of these matters.

#### 5.6 Use and Disclosure

BTS uses and discloses personal information only for primary purposes or permitted secondary purposes where consent is provided, reasonably expected, or required or authorised by law.

Where information is disclosed for enforcement-related activities, BTS maintains appropriate records of the disclosure in accordance with legislative requirements.

#### 5.7 Direct Marketing

BTS does not use or disclose personal information for direct marketing purposes unless permitted under the Privacy Act 1988 (Cth).

Where direct marketing is undertaken, BTS ensures that:

- the information was collected directly from the individual, and the individual would reasonably expect its use for direct marketing; or
- the individual has provided consent, or an exception under the APPs applies; and
- a clear, simple and free opt-out mechanism is provided in each communication.

Individuals may request at any time that BTS cease using or disclosing their personal information for direct marketing purposes. BTS will comply with such requests promptly and at no cost.

On request, BTS will also advise an individual of the source of their personal information used for direct marketing, unless it would be unreasonable or impracticable to do so.

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## 5.8 Cross-Border Disclosure of Personal Information

Before disclosing personal information to an overseas recipient, BTS takes reasonable steps to ensure that the recipient handles the information in a manner consistent with the Australian Privacy Principles, unless an exception under the Privacy Act applies.

## 5.9 Government-Related Identifiers

BTS does not adopt, use or disclose government-related identifiers (such as tax file numbers or student identifiers) except where:

- required or authorised by Australian law;
- reasonably necessary to verify an individual's identity;
- required to meet obligations to a government agency or authority; or
- otherwise permitted under applicable regulations.

## 5.10 Quality of Personal Information

BTS takes reasonable steps to ensure personal information it collects, uses, or discloses is accurate, up-to-date, complete and relevant for its intended purpose.

Measures supporting data quality include:

- consistent collection practices and verification processes;
- staff training and internal quality controls;
- system prompts for updating records;
- providing individuals with accessible means to review and update their information; and
- periodic review and confirmation of information, particularly prior to use or disclosure.

## 5.11 Security of Personal Information

BTS takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. These measures include:

- restricted access to physical premises and information systems;
- role-based system permissions and login controls;
- secure storage of electronic and paper records;
- staff privacy training and induction programs; and
- regular audits of information security controls.

Personal information is destroyed or de-identified when it is no longer required for lawful business or regulatory purposes.

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## 5.12 Access to Personal Information

Individuals may request access to personal information held by BTS. BTS will:

- verify the identity and authority of the requester;
- respond within legislated timeframes;
- provide access in the requested format where reasonable; and
- provide access free of charge, unless an exception applies.

Where access is refused, BTS will provide written reasons and advise the individual of available complaint mechanisms.

## 5.13 Correction of Personal Information

BTS takes reasonable steps to correct personal information to ensure it is accurate, up-to-date, complete, relevant and not misleading.

### *On Request*

Upon request, BTS will:

- correct the information as required;
- notify relevant third parties of corrections where appropriate; and
- complete corrections within required timeframes and at no cost.

Where a correction request is refused, BTS will provide written reasons and, if requested, associate a statement with the relevant information.

### *At BTS's Initiative*

BTS will correct personal information on its own initiative where it becomes aware that information held is inaccurate, out-of-date, incomplete, irrelevant or misleading.

## 6. Procedures

### 6.1. Request for Records Access Procedure

Individuals, or authorised third parties, may request access at any time to personal information held by Barrington Training Services (BTS). BTS manages all access requests in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

#### *1. Submitting a Request*

Access requests must provide sufficient information to enable BTS to:

- identify the individual concerned;
- verify the identity of the requester; and

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- determine the specific records or information being requested.

Requests may be submitted in any written or verbal form; however, use of the BTS Records Request Form is preferred to enable timely processing.

## *2. Receipt and Assessment of Requests*

Upon receipt of a request, BTS will:

- verify the identity of the individual or requesting party;
- confirm that the requester is authorised to access the information;
- search records under BTS's control to locate the requested personal information; and
- collate relevant information for disclosure, where access is permitted.

## *3. Identity Verification*

BTS requires a reasonable level of identity verification before granting access. Only the minimum information necessary to confirm identity is collected, which may include:

- full name;
- date of birth;
- last known address; and
- signature or equivalent verification.

Where requests are made:

- in person — photographic or official identification may be sighted; or
- by telephone — personal details or service-specific information may be confirmed before proceeding.

## *4. Providing Access*

Once identity and authorisation are confirmed, BTS will provide access to the requested personal information:

- **within 30 calendar days** of receiving the request;
- free of charge; and
- in the format requested by the individual, where reasonable and practicable.

If the requested format is not practical, BTS will consult with the requester to agree on an alternative format that meets their needs.

## *5. Refusal of Access*

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Where access cannot be provided due to:

- inability to verify identity or authority; or
- another lawful basis for refusal under the Privacy Act,

BTS will notify the requester in writing **within 30 calendar days**, outlining:

- the reasons for refusal; and
- available complaint and escalation mechanisms.

## 6.2 Request for Records Update Procedure

Individuals, or authorised third parties, may request at any time that personal information held by Barrington Training Services (BTS) be corrected or updated. BTS manages all update requests in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

### 1. Submitting a Request

Requests for record updates must provide sufficient information to enable BTS to:

- identify the individual concerned;
- verify the requester's identity; and
- determine the specific personal information requested to be updated.

Requests may be made in any form; however, use of the BTS Records Request Form is preferred to facilitate timely processing.

### 2. Receipt and Assessment of Requests

Upon receipt of a request, BTS will:

- verify the identity of the individual or authorised representative;
- locate the relevant records held by BTS; and
- assess the existing information against the requested update to determine whether the correction is required.

### 3. Assessment of Information Accuracy

BTS assesses whether the personal information held is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

This assessment may include verification against other BTS records or, where appropriate, relevant government or authoritative databases.

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#### 4. Implementing Updates

Where an update is approved, BTS will:

- correct the personal information free of charge **within 14 calendar days** of receiving the request; and
- notify relevant third parties of the correction, where the information has previously been disclosed, and notification is reasonable and practicable.

#### 5. Refusal to Update

Where BTS is unable to update the information due to:

- inability to verify identity; or
- another lawful basis for refusal,

BTS will notify the requester in writing **within 14 calendar days**, free of charge. The notification will:

- outline the reasons for refusal; and
- advise the individual of available complaint and escalation mechanisms.

#### 6. Statement of Correction

If a correction request is refused, the individual may request that a statement be associated with the relevant personal information indicating that they believe the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Upon request, BTS will take reasonable steps to associate the statement with all relevant records across BTS systems **within 30 calendar days**, free of charge.

### 7. Breaches

If a staff member is found to be in breach of this Policy, they may be subject to disciplinary action in accordance with the relevant Code of Conduct and Misconduct Procedure.

### 8. Appeals

Complaints and Appeals concerning any decision taken in relation to this Policy should be made under the relevant **Complaints and Appeals Policy**, which can be accessed from the BTS website.

If, after considering the response, the individual remains dissatisfied with the outcome, they may escalate their complaint to the Office of the Australian Information Commissioner (OAIC) for independent investigation:

**Office of the Australian Information Commissioner**

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Phone: 1300 363 992

When investigating a complaint, the OAIC will generally seek to resolve the matter through conciliation before exercising any formal enforcement or complaint-resolution powers.

**9. References**

- *Privacy Act 1988 (Cth)*
- *Australian Privacy Principles*

**Document History:**

Version	Date	Author	Reason	Sections
1.0	1/12/2017	Training Operations Manager	Policy creation	All
2.0	26/03/2026	RTO Manager	Document content and template updated for clarity and alignment with current procedures	All

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