



FACT ADELAIDE • STUDENT POLICY

Student Privacy Policy

How FACT collects, uses and protects student information

FACT-POL-12 | Revision 2026.1-D02

Proposed effective date: 1 October 2026

Next review: 1 October 2027

Policy owner: Allan Bartlett, Course Director

Wording reviewed: 6 September 2026

FORMAL APPROVAL AND PUBLICATION PENDING

Reviewed decisions consolidated 6 September 2026.
See the internal record for source and final approval checks.

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Student Privacy Policy

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1. Scope and privacy responsibility

This policy covers personal information FACT handles for enquiries, enrolment, training, assessment, administration and student support. FACT will handle information fairly and transparently, use the Australian Privacy Principles as its privacy framework and comply with the laws that apply to its activities.

For privacy enquiries, contact FACT management at info@factadelaide.com or (08) 7226 5936.

2. Information FACT collects

FACT will collect only the personal information reasonably required for enquiries, bookings and enrolment; contact and emergency details; AVETMISS and other required VET reporting; USI and identity verification; training and assessment; certification and payments; and relevant student support or safety needs.

Students will be told why the information is required, how it will normally be used or disclosed, how they can access or correct it, and what may happen if required information is not supplied. People may make general enquiries without identifying themselves where practical.

FACT will obtain appropriate consent before collecting sensitive information unless another lawful basis applies.

Medical evidence will normally only need to confirm that the student was unable to attend or participate. FACT will not routinely request a diagnosis, detailed symptoms, a complete medical history or copies of medication records.

FACT will verify required identification but will not retain complete copies of identity documents unless they are genuinely required.

3. Use, disclosure and certificate verification

FACT will use personal information for the purpose for which it was collected or another purpose permitted by law.

Required student and training information may be provided to NCVER, government departments, regulators and other authorised bodies. Students will receive the applicable privacy notices. USI information will be handled under FACT's USI Policy.

Where a company books and pays FACT directly for a student's training, FACT may send the Statement of Attainment only to the authorised company contact. The student will be informed of this during enrolment.

The company will not receive assessment evidence, identification documents, medical or support information, contact details or the student's complete record.

Where the student paid for their own training, FACT will not provide their SOA or records to an employer, contractor or other third party without the student's specific permission or another lawful authority.

A third party wanting to confirm that an SOA is genuine will be sent FACT's verification flyer and directed to the online certificate-verification system.

If online verification does not work, including for older certificates, FACT may manually confirm whether the SOA is genuine using the minimum necessary information. The request and outcome will be recorded, and no additional student information will be released.

FACT may use approved student-management, learning, email and payment providers. Only the information necessary for each service will be provided.

4. Media, recording and marketing

FACT will obtain separate, informed and recorded permission before using an identifiable student's photograph, video, name or testimonial for promotion. FACT will explain how and where the material will be used.

Promotional permission is optional. Refusing permission will not affect enrolment, training, assessment or certification. Attending a course does not give FACT permission to use a student's image for advertising.

For students under 18, FACT will obtain parent or guardian permission for promotional use and respect the student's wishes.

Students may withdraw promotional permission by contacting FACT. FACT will stop future use and take reasonable steps to remove material it controls. Printed material already distributed or copies shared by others may not be recoverable.

Any recording for assessment, safety or security will be explained separately, including its purpose and how it will be handled. FACT will obtain any required consent or other lawful authority. Such recordings will not be reused for marketing without separate permission.

Marketing emails and SMS messages require valid consent, must identify FACT and must provide an effective way to unsubscribe. Essential booking, training and administration messages may continue when a student unsubscribes from marketing.

5. Access, correction and complaints

Students may request access to their personal information or ask FACT to correct it by phone, email or with assistance from staff. FACT will check their identity before releasing information.

FACT aims to acknowledge requests within two business days and respond within 30 calendar days. If more time is needed, FACT will explain why and provide an expected response date.

There is no fee to make a request or correct personal information. Any reasonable charge for providing access will be explained beforehand. If access is lawfully restricted, FACT will explain the reason and available review options.

FACT will correct confirmed inaccuracies and, where appropriate, notify others who received the incorrect information. If a correction is disputed, FACT will explain its decision and record the student's requested correction or statement of disagreement.

Privacy complaints can be made through FACT's Complaints and Appeals policies. Students retain any right to contact the Office of the Australian Information Commissioner or another relevant external body.

6. Security, retention and incidents

FACT protects student information by limiting access to authorised staff who need it for their work. Security measures include secure accounts and devices, appropriate multifactor authentication, controlled downloads, backups and secure disposal.

Student information is retained according to FACT's Student Records Policy and applicable requirements. Different records have different retention periods; identity and medical information are not automatically kept for 30 years.

Staff must immediately report suspected loss, unauthorised access or disclosure to management. FACT will act promptly to contain the incident, preserve relevant evidence and assess the potential harm.

Where notification is legally required, FACT will notify affected individuals and the relevant regulator. FACT will record the incident, actions taken and improvements needed to reduce the risk of it happening again.

Document control and release record

Internal record — remove this page from the student-facing publication.

Document: FACT-POL-12 — Student Privacy Policy

Revision: 2026.1-D02

Owner: Allan Bartlett, Course Director

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Next review: 1 October 2027

Amendment record

2026.1-D01 | 6 September 2026 | Initial review-pack draft, based on the uploaded Privacy Policy and linked student policies.

2026.1-D02 | 6 September 2026 | Added matching FACT cover and consolidated the simplified review wording. Includes the company-paid SOA-only rule; permission for student-paid records; verification flyer and manual fallback; media choices; access and correction; and security and incident handling.

Review status

Allan accepted sections 1–6 during the conversational review. This is a consolidated document for final approval, not a record of publication.

Source note: sections 2, 3, 5 and 6 are consolidated from the available accepted text, with the section 2 list converted to prose. Section 1 is condensed from the review-pack draft. Section 4 is reconstructed from the accepted review notes; its complete original read-through text was not recovered. Confirm those consolidated sections at final approval.

Before release

Confirm the legal entity, applicable privacy obligations and contact address. Check supplier access and overseas handling, security controls, recording arrangements, retention periods and response targets. Align the enrolment notices, handbook, website terms, USI and linked policies with the approved wording.

Wording review: 6 September 2026

Formal approval / date: _____

Publication / date: _____

Future amendment: version _____ date _____

Section and change: _____

Authorised by: _____