

Privacy Policy

Purpose

The purpose of this policy is to ensure that The Celebrant Institute RTO manages personal and sensitive information responsibly, transparently, and in compliance with the Australian Privacy Principles (APPs) under the *Privacy Act 1988*. This policy outlines how personal information is collected, used, disclosed, stored, and protected by The Celebrant Institute RTO.

This policy applies to all personal and sensitive information collected by The Celebrant Institute RTO in relation to students, personnel, contractors, and other stakeholders. It covers all methods of information handling, including digital, physical, and verbal communications.

The Celebrant Institute RTO is committed to protecting the privacy of individuals and ensuring the confidentiality, security, and integrity of personal and sensitive information. The organisation will comply with the Australian Privacy Principles and other relevant legislation while fostering trust and transparency in all interactions.

The Celebrant Institute RTO complies with the *Privacy Act 1988 (Cth)* including the 13 Australian Privacy Principles (APPs) as outlined in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)*. Providing an overall framework for our privacy practices, The Celebrant Institute RTO has developed and implemented this Privacy Policy.

Personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.

For example, personal information may include:

- An individual's name, signature, address, phone number or date of birth,
- Sensitive information,
- Credit information,
- Employee record information,
- Photographs,
- Internet protocol (IP) addresses,
- Voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique), and
- Location information from a mobile device (because it can reveal user activity patterns and habits).

Sensitive information is personal information that includes information or an opinion about an individual's:

- Racial or ethnic origin,
- Political opinions or associations,
- Religious or philosophical beliefs,
- Trade union membership or associations,
- Sexual orientation or practices,
- Criminal record,
- Health or genetic information, and
- Some aspects of biometric information.

Rationale

The Celebrant Institute RTO's privacy processes are designed to support effective and compliant privacy practices by aligning with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (APPs). These processes ensure that personal and sensitive information is managed responsibly, transparently, and securely, fostering trust among stakeholders while meeting regulatory obligations. By outlining clear procedures for the collection, use, storage, and disclosure of information, The Celebrant Institute RTO ensures that all activities are compliant with national and state-specific legislation. This includes robust measures for maintaining data quality and security, such as password-protected ICT systems, secure physical storage, and regular audits to prevent unauthorised access, misuse, or loss of personal information.

The organisation demonstrates transparency through accessible privacy policies, detailed notifications at the point of data collection, and clear avenues for individuals to request access to or correction of their personal information. Provisions for anonymity and informed consent further respect individual privacy, while processes for handling complaints and escalating unresolved issues to external authorities reinforce accountability. Regular monitoring and evaluation of privacy practices enable continuous improvement, ensuring that processes remain effective and adapt to evolving legal and organisational requirements. Together, these comprehensive privacy processes safeguard individual rights and promote organisational integrity.

Legislation

This policy is designed to maintain requirements with additional jurisdictional requirements including:

- *Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)*,
- *Education Services for Overseas Students Act 2000 (Cth)*,
- *Information Privacy Act 2014 (ACT)*,
- *Privacy and Personal Information Protection Act 1998 (NSW)*,
- *Information Act 2003 (NT)*,
- *Information Privacy Act 2009 (QLD)*,
- *Personal Information Protection Act 2004 (TAS)*,
- *Privacy and Data Protection Act 2014 (VIC)*, and
- *Privacy and Responsible Information Sharing Act 2024 (WA)*.

Australian Privacy Principles

The Celebrant Institute RTO manages personal information in an open and transparent way. This is evident in the implementation of practices, procedures and systems we outline in this policy, that ensure our compliance with the APPs and any binding registered APP code and provide suitable procedures for The Celebrant Institute RTO personnel to be able to deal with related inquiries and complaints that may be received from time to time.

The following sections of this policy outline how we manage personal information.

Australian Privacy Principle 1: Open and transparent management of personal information

Purposes for information collection, retention, use and disclosure

The Celebrant Institute RTO retains a record of personal information about all individuals with whom we undertake any form of business activity. The Celebrant Institute RTO must collect, hold, use and disclose information from our clients and stakeholders for a range of purposes, including but not limited to:

- Providing services to clients,
- Managing employee and contractor teams,
- Promoting products and services,

- Conducting internal business functions and activities, and
- Requirements of stakeholders.

As a government registered training organisation, regulated by the Australian Skills Quality Authority, The Celebrant Institute RTO is required to collect, hold, use and disclose a wide range of personal and sensitive information on students in nationally recognised training programs. This information requirement is outlined in the *National Vocational Education and Training Regulator Act 2011* (Cth) and associated legislative instruments. In particular, the legislative instruments:

- *Student Identifiers Act 2014* (Cth),
- *National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025* (Cth),
- *National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025* (Cth),
- *Higher Education Support Act 2003* (Cth), and
- *Data Provision Requirements 2020* (Cth).

It is noted that The Celebrant Institute RTO is also bound by various State Government Acts requiring similar information collection, use and disclosure (particularly *Education Act(s)*, *Vocational Education & Training Act(s)* and *Traineeship & Apprenticeships Act(s)* relevant to state jurisdictions of The Celebrant Institute RTO operations).

Individuals are advised that due to these legal requirements, The Celebrant Institute RTO discloses information held on individuals for valid purposes to a range of entities including governments (Commonwealth, State or Local) and services for data management.

Kinds of personal information collected and held

The following types of personal information are generally collected, depending on the need for services delivery:

- Contact details,
- Employment details,
- Educational background,
- Demographic information,
- Course progress and achievement information, and
- Financial billing information.

The following types of sensitive information may also be collected and held:

- Identity details,
- Employee details & HR information,
- Complaint or issue information,
- Disability status & other individual needs,
- Indigenous status, and
- Background checks (such as National Criminal Checks or Working with Children checks).

The Celebrant Institute RTO does not collect personal information of children because we do not have any students under the age of 18.

How personal information is collected

The Celebrant Institute RTO's usual approach to collecting personal information is to collect any required information directly from the individuals concerned. This may include the use of forms (such as registration

forms, enrolment forms or services delivery records) and the use of web-based systems (such as online enquiry forms, web portals or internal operating systems).

The Celebrant Institute RTO does receive solicited and unsolicited information from third party sources in undertaking services delivery activities. This may include information from such entities as governments (Commonwealth, State or Local) and background check providers.

How personal information is held

The Celebrant Institute RTO's usual approach to holding personal information includes robust storage and security measures at all times. Information is:

- Collected in electronic format,
- Stored in secure, password protected systems, such as the Xero financial system and the aXcelerate learning management system and student management system, and
- Monitored for appropriate authorised use at all times.

Only authorised personnel are provided with login information to each system, with system access limited to only those relevant to their specific role. The Celebrant Institute RTO ICT systems are hosted internally with robust internal security to physical server locations and server systems access. Virus protection, backup procedures and ongoing access monitoring procedures are in place.

Individual information held across systems is linked through an The Celebrant Institute RTO allocated identification number for each individual.

Retention and destruction of information

Information is retained in password-protected systems indefinitely. In the event of our organisation ceasing to operate, the required personal information on record for individuals undertaking nationally recognised training with us would be transferred to the Australian Skills Quality Authority, as required by law.

Use of AI

This Privacy Policy explains our use of AI, the kinds of personal information processed by AI, purposes of use, sources, disclosures, generation/inference, any overseas processing, and how to contact us about AI.

The organisation defines permitted and prohibited uses of each AI product, provides role-appropriate training on privacy and security risks, continuously monitor outputs for accuracy and drift, and conducts regular audits of AI use.

Automated decisions

The Celebrant Institute RTO does not use computer program(s) to make or do a thing that is substantially and directly related to making decisions.

The Celebrant Institute RTO does use aXcelerate's AI marking assistant to review short answer responses, make suggestions about whether or not they meet the benchmark responses, and generate draft feedback, but a human assessor is always responsible for making the final assessment decision and providing feedback.

Accessing and seeking correction of personal information

The Celebrant Institute RTO confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to make contact with:

The Celebrant Institute RTO CEO: Sarah Aird, sarah@celebrantinstitute.edu.au

A number of third parties, other than the individual, may request access to an individual's personal information. Such third parties may include employers, governments (Commonwealth, State or Local) and various other stakeholders.

In all cases where access is requested, The Celebrant Institute RTO ensures that:

- Parties requesting access to personal information are robustly identified and vetted,

- Where legally possible, the individual to whom the information relates will be contacted to confirm consent (if consent not previously provided for the matter), and
- Only appropriately authorised parties, for valid purposes, will be provided access to the information.

Complaints about a breach of the APPs or a binding registered APP code

If an individual feels that The Celebrant Institute RTO may have breached one of the APPs or a binding registered APP code, please refer to the *Privacy Complaints Procedure* below for further information on what actions may be taken.

Likely overseas disclosures

The Celebrant Institute RTO confirms that individuals' personal information is not disclosed to overseas recipients, for any purpose.

Making our Privacy Policy available

The Celebrant Institute RTO provides our Privacy Policy free of charge, with all information being publicly available on our website. In addition, this Privacy Policy is:

- Included within our **Student Handbook**,
- Noted within the text or instructions at all information collection points (such as informing individuals during a telephone call of how the policy may be accessed, in cases where information collection is occurring), and
- Available for distribution free of charge on request, as soon as possible after the request is received, including in any particular format requested by the individual as is reasonably practical.

If, in the unlikely event the APP Privacy Policy is not able to be provided in a particular format requested by an individual, we will explain the circumstances around this issue with the requester and seek to ensure that another appropriate method is provided.

Review and Update of this Privacy Policy

The Celebrant Institute RTO reviews this Privacy Policy:

- On an ongoing basis, as suggestions or issues are raised and addressed, or as government required changes are identified,
- Before production use of any new AI product or any material change in how an existing AI product processes personal information,
- Through our internal audit processes on at least an annual basis,
- As a part of any external audit of our operations that may be conducted by various government agencies as a part of our registration as an RTO or in normal business activities, and
- As a component of each and every complaint investigation process where the complaint is related to a privacy matter.

Where this policy is updated, changes to the policy are widely communicated to stakeholders through internal personnel communications, meetings, training and documentation, and externally through publishing of the policy on The Celebrant Institute RTO's website and other relevant documentation (such as our **Student Handbook**) for clients.

Australian Privacy Principle 2: Anonymity and pseudonymity

The Celebrant Institute RTO provides individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us in relation to a particular matter, whenever practical. This includes providing options for anonymous dealings in cases of general course enquiries or other situations in which an individual's information is not required to complete a request.

Individuals may deal with us by using a name, term or descriptor that is different to the individual's actual name wherever possible. This includes using generic email addresses that does not contain an individual's actual name, or generic usernames when individuals may access a public component of our website or enquiry forms.

The Celebrant Institute RTO only stores and links pseudonyms to individual personal information in cases where this is required for services delivery (such as system login information) or once the individual's consent has been received.

Individuals are advised of their opportunity to deal anonymously or by pseudonym with us where these options are possible.

Requiring identification

The Celebrant Institute RTO must require and confirm identification in services delivery to individuals for nationally recognised course programs. We are authorised by Australian law to deal only with individuals who have appropriately identified themselves. That is, it is a *Condition of Registration* for all RTOs under the *National Vocational Education and Training Regulator Act 2011* that we identify individuals and their specific individual needs on commencement of services delivery and collect and disclose Australian Vocational Education and Training Management of Information Statistical Standard (AVETMISS) data on all individuals enrolled in nationally recognised training programs. Other legal requirements, as noted earlier in this policy, also require considerable identification arrangements.

There are also other occasions also within our services delivery where an individual may not have the option of dealing anonymously or by pseudonym, as identification is practically required for us to effectively support an individual's request or need.

Australian Privacy Principle 3: Collection of solicited personal information

The Celebrant Institute RTO only collects personal information that is reasonably necessary for our business activities.

We only collect sensitive information in cases where the individual consents to the sensitive information being collected, except in cases where we are required to collect this information by law, such as outlined earlier in this policy.

All information we collect is collected only by lawful and fair means. We only collect solicited information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner.

Australian Privacy Principle 4: Dealing with unsolicited personal information

The Celebrant Institute RTO may from time to time receive unsolicited personal information. Where this occurs, we promptly review the information to decide whether or not we could have collected the information for the purpose of our business activities. Where this is the case, we may hold, use and disclose the information appropriately as per the practices outlined in this policy.

Where we could not have collected this information (by law or for a valid business purpose) we immediately destroy or de-identify the information (unless it would be unlawful to do so).

Australian Privacy Principle 5: Notification of the collection of personal information

Whenever The Celebrant Institute RTO collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.

Our notifications to individuals on data collection include:

- The Celebrant Institute RTO's identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters,
- The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party,

- If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection,
- The purpose of collection, including any primary and secondary purposes,
- The consequences for the individual if all or some personal information is not collected,
- Other organisations or persons to which the information is usually disclosed, including naming those parties,
- Whether we are likely to disclose the personal information to overseas recipients, and if so, the names of the recipients and the countries in which such recipients are located.
- A link to this APP Privacy Policy on our website or explanation of how it may be accessed, and
- Advice that this APP Privacy Policy contains information about how the individual may access and seek correction of the personal information held by us, and how to complain about a breach of the APPs, or any registered APP code, and how we will deal with such a complaint.

Where possible, we ensure that the individual confirms their understanding of these details, such as through signed declarations, website form acceptance of details, or in person through questioning.

Collection from third parties

Where The Celebrant Institute RTO collects personal information from another organisation, we:

- Confirm whether the other organisation has provided the relevant notice above to the individual, or whether the individual was otherwise aware of these details at the time of collection, and
- If this has not occurred, we will undertake this notice to ensure the individual is fully informed of the information collection.

Australian Privacy Principle 6: Use or disclosure of personal information

The Celebrant Institute RTO only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected, or secondary purposes in cases where:

- An individual consented to a secondary use or disclosure,
- An individual would reasonably expect the secondary use or disclosure, and that is directly related to the primary purpose of collection, or
- Using or disclosing the information is required or authorised by law.

AI use and disclosure test

Before any personal information is entered into, shared with or processed by any AI product, The Celebrant Institute RTO requires a documented check that this use matches the original collection purpose, or is within reasonable expectation for any secondary purpose, or is directly related if sensitive information is involved.

If this cannot be confirmed, XYZ RTO obtains consent from the individual prior to AI use.

Requirement to make a written note of use or disclosure for this secondary purpose

If The Celebrant Institute RTO uses or discloses personal information in accordance with an 'enforcement related activity' we will make a written note of the use or disclosure, including the following details:

- The date of the use or disclosure,
- Details of the personal information that was used or disclosed,
- The enforcement body conducting the enforcement related activity,
- If the organisation used the information, how the information was used by the organisation, and
- The basis for our reasonable belief that we were required to disclose the information.

Australian Privacy Principle 7: Direct marketing

The Celebrant Institute RTO does not use or disclose the personal information that it holds about an individual for the purpose of direct marketing, unless:

- The personal information has been collected directly from an individual, and the individual would reasonably expect their personal information to be used for the purpose of direct marketing, or
- The personal information has been collected from a third party, or from the individual directly, but the individual does not have a reasonable expectation that their personal information will be used for the purpose of direct marketing, and
- We provide a simple method for the individual to request not to receive direct marketing communications (also known as 'opting out').

On each of our direct marketing communications, The Celebrant Institute RTO provides a prominent statement that the individual may request to opt out of future communications, and how to do so. An individual may also request us at any stage not to use or disclose their personal information for the purpose of direct marketing, or to facilitate direct marketing by other organisations. We comply with any request by an individual promptly and undertake any required actions for free.

We also, on request, notify an individual of our source of their personal information used or disclosed for the purpose of direct marketing unless it is unreasonable or impracticable to do so.

Australian Privacy Principle 8: Cross-border disclosure of personal information

Before The Celebrant Institute RTO discloses personal information about an individual to any overseas recipient, we take reasonable steps to ensure that The Celebrant Institute RTO does not breach any privacy matters in relation to that information.

Australian Privacy Principle 9: Adoption, use or disclosure of government related identifiers

The Celebrant Institute RTO does not adopt, use or disclose a government related identifier related to an individual except:

- In situations required by Australian law or other legal requirements,
- Where reasonably necessary to verify the identity of the individual,
- Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority, or
- As prescribed by regulations.

Australian Privacy Principle 10: Quality of personal information

The Celebrant Institute RTO takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. We also take reasonable steps to ensure that the personal information we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant. This is particularly important:

- When we initially collect the personal information, and
- When we use or disclose personal information.

We take steps to ensure personal information is factually correct. In cases of an opinion, we ensure information takes into account competing facts and views and makes an informed assessment, providing it is clear this is an opinion. Information is confirmed up to date at the point in time to which the personal information relates.

Quality measures in place supporting these requirements include:

- Internal practices, procedures and systems to audit, monitor, identify and correct poor quality personal information (including training personnel in these practices, procedures and systems),
- Protocols that ensure personal information is collected and recorded in a consistent format, from a primary information source where possible,

- Requiring AI input validation and output validation where AI systems include the use or creation of personal information.
- Ensuring updated or new personal information is promptly added to relevant existing records,
- Providing individuals with a simple means to review and update their information on an on-going basis through our online portal,
- Reminding individuals to update their personal information at critical services delivery points (such as completion) when we engage with the individual,
- Contacting individuals to verify the quality of personal information where appropriate when it is about to be used or disclosed, particularly if there has been a lengthy period since collection, and
- Checking that a third party, from whom personal information is collected, has implemented appropriate data quality practices, procedures and systems.

Australian Privacy Principle 11: Security of personal information

The Celebrant Institute RTO takes active measures to consider whether we are able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We destroy or de-identify personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.

Access to The Celebrant Institute RTO offices and work areas is limited to our personnel only. Visitors to our premises must be authorised by relevant personnel and are accompanied at all times.

Regular personnel training and information bulletins are conducted with The Celebrant Institute RTO personnel on privacy issues and how the APPs apply to our practices, procedures and systems. Training is also included in our personnel induction practices.

We conduct ongoing internal audits (at least annually and as needed) of the adequacy and currency of security and access practices, procedures and systems implemented.

Australian Privacy Principle 12: Access to personal information

Where The Celebrant Institute RTO holds personal information about an individual, we provide that individual access to the information on their request. In processing requests, we:

- Ensure through confirmation of identity that the request is made by the individual concerned, or by another person who is authorised to make a request on their behalf,
- Respond to a request for access:
 - Within 14 calendar days, when notifying our refusal to give access, including providing reasons for refusal in writing, and the complaint mechanisms available to the individual, or
 - Within 30 calendar days, by giving access to the personal information that is requested in the manner in which it was requested.
- Provide information access free of charge.

Australian Privacy Principle 13: Correction of personal information

The Celebrant Institute RTO takes reasonable steps to correct personal information we hold, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

Individual requests

On an individual's request, we:

- Correct personal information held, and

- Notify any third parties of corrections made to personal information, if this information was previously provided to these parties.

In cases where we refuse to update personal information, we:

- Give a written notice to the individual, including the reasons for the refusal and the complaint mechanisms available to the individual,
- Upon request by the individual whose correction request has been refused, take reasonable steps to associate a statement with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading,
- Respond within 14 calendar days to these requests, and
- Complete all actions free of charge.

Correcting at The Celebrant Institute RTO's initiative

We take reasonable steps to correct personal information we hold in cases where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading (that is, the information is faulty). This awareness may occur through collection of updated information, in notification from third parties or through other means.

AI Governance and Assurance

The Celebrant Institute RTO may use commercially available AI products to support service delivery. Where personal information is involved, we apply the Australian Privacy Principles as follows:

APP 1 and 5: Transparency

The organisation's Privacy Policy and collection notices describe the use of AI, including what information is processed, how AI uses, discloses or generates personal information, any overseas processing and how to contact us. The AI Register lists each AI product and its purpose.

APP 3: Collection, generation and inference

AI-generated or inferred personal information is treated as collection. The Celebrant Institute RTO limits such activity to what is reasonably necessary, ensure lawful and fair means, prefer direct collection where practicable, and obtain consent before generating or inferring sensitive information.

APP 6: Use and disclosure

Before any personal information is processed by an AI product, The Celebrant Institute RTO personnel complete an APP 6 assessment of primary purpose match or reasonable expectation for any secondary purpose, including direct relation for any sensitive information.

Processing does not proceed unless these requirements are satisfied of further consent is obtained.

APP 10: Accuracy and oversight

Records that include AI-derived personal information are labelled as "AI derived." Personnel verify accuracy and relevance before use that may affect an individual. We inform individuals where AI is used in ways that may materially affect them.

Lifecycle assurance

The Celebrant Institute RTO maintains policies that define permitted and prohibited uses of AI, provide role-based training, monitor outputs, and perform regular audits of AI use.

Request for Records Access

Individuals or third parties may at any stage request access to records held by The Celebrant Institute RTO relating to their personal information. The following procedure is followed on each individual request for access:

1. A request for access is provided by the requester, with suitable information provided to be able to:
 - a. Identify the individual concerned,
 - b. Confirm their identity, and
 - c. Identify the specific information that they are requesting access to.

This request may be in any form, or preferably using The Celebrant Institute RTO's *Records Access or Update Request Form*.

2. Upon receiving a request for access, The Celebrant Institute RTO then:
 - a. Confirms the identity of the individual or party requesting access,
 - b. Confirms that this individual or party is appropriately authorised to receive the information requested,
 - c. Searches the records that we possess or control to assess whether the requested *personal information* is contained in those records, and
 - d. Collates any personal information found ready for access to be provided.

Confirming identity

The Celebrant Institute RTO personnel must be satisfied that a request for personal information is made by the individual concerned, or by another person who is authorised to make a request on their behalf. The minimum amount of personal information needed to establish an individual's identity is sought, which is generally an individual's name, date of birth, last known address and signature.

When meeting the requesting party in person, identification may be sighted.

If confirming details over a telephone conversation, questions regarding the individual's name, date of birth, last known address or service details must be confirmed before information is provided.

3. Once identity and access authorisation is confirmed, and personal information is collated, access is provided to the requester within 30 calendar days of receipt of the original request. We will provide access to personal information in the specific manner or format requested by the individual, wherever it is reasonable and practicable to do so, free of charge.

Where the requested format is not practical, we consult with the requester to ensure a format is provided that meets the requester's needs.

4. If the identity or authorisation access cannot be confirmed, or there is another valid reason why The Celebrant Institute RTO is unable to provide the personal information, refusal to provide access to records will be provided to the requester, in writing. Our notification will include reason(s) for the refusal, and the complaint mechanisms available to the individual. Such notifications are provided to the requester within 30 calendar days of receipt of the original request.

Request for Records Update

Individuals or third parties may at any stage request that their records held by The Celebrant Institute RTO relating to their personal information be updated. The following procedure is followed on each individual request for records updates:

1. A request for records update is provided by the requester, with suitable information provided to be able to:
 - a. Identify the individual concerned,
 - b. Confirm their identity, and
 - c. Identify the specific information that they are requesting be updated on their records.

This request may be in any form, or preferably using The Celebrant Institute RTO's *Records Access or Update Request Form*.

2. Upon receiving a request for records update, The Celebrant Institute RTO then:
 - a. Confirms the identity of the individual or party to whom the record relates,
 - b. Searches the records that we possess or control to assess whether the requested *personal information* is contained in those records, and
 - c. Assesses the information already on record, and the requested update, to determine whether the requested update should proceed.

Assessing update

The Celebrant Institute RTO personnel assess the relevant personal information we hold, and the requested updated information, to determine which version of the information is considered accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

This may include checking information against other records held by us, or within government databases, in order to complete an assessment of the correct version of the information to be used.

3. Once identity and information assessment is confirmed, personal information is:
 - a. Updated, free of charge, within 14 calendar days of receipt of the original request, and
 - b. Notified to any third parties of corrections made to personal information, if this information was previously provided to these parties.
4. If the identity of the individual cannot be confirmed, or there is another valid reason why The Celebrant Institute RTO is unable to update the personal information, refusal to update records will be provided to the requester in writing, free of charge, within 14 calendar days.

Our notification will include the reasons for the refusal and the complaint mechanisms available to the individual.

5. Upon request by the individual whose correction request has been refused, we will also take reasonable steps to associate a 'statement' with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading. This statement will be applied, free of charge, to all personal information relevant across The Celebrant Institute RTO systems within 30 calendar days of receipt of the statement request.

Privacy Complaints

If an individual feels that The Celebrant Institute RTO has breached its obligations in the handling, use or disclosure of their personal information, they may raise a complaint. We encourage individuals to discuss the situation with their The Celebrant Institute RTO representative in the first instance, before making a complaint.

The complaints handling process is as follows:

1. The individual should make the complaint including as much detail about the issue as possible, in writing to The Celebrant Institute RTO: Sarah Aird, CEO, sarah@celebrantinstitute.edu.au
2. The Celebrant Institute RTO will investigate the circumstances included in the complaint and respond to the individual as soon as possible (and within 30 calendar days) regarding its findings and actions following this investigation.
3. After considering this response, if the individual is still not satisfied, they may escalate their complaint directly to the Information Commissioner for investigation:

Office of the Australian Information Commissioner | www.oaic.gov.au | Phone: 1300 363 992

When investigating a complaint, the OAIC will initially attempt to conciliate the complaint, before considering the exercise of other complaint resolution powers.

4. Alternatively, if the complaint relates to a non-privacy matter, or should individuals choose to do so, a complaint may also be lodged with the ASQA complaints handling service for complaints against RTOs:

Australian Skills Quality Authority | www.asqa.gov.au | Phone: 1300 701 801

Monitoring and Evaluation

The Celebrant Institute RTO monitors and evaluates privacy processes to ensure effectiveness.

A process of performance monitoring, evaluation, and reporting has been established and implemented.

The organisation continually improves the effectiveness and efficiency of processes. Process performance and outcomes are regularly audited to identify and remove causes of existing and potential problems, as well as to uncover any opportunities for improvement.

Please refer to the **Quality Policy** for further information on the monitoring and evaluation process.

Version History

Date of issue	Version	Author	Notes
30/06/2026	1.0	Sarah Aird	Final after contextualising from VETR version

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