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S U C C E E D

ARTIFICIAL INTELLIGENCE GOVERNANCE AND ETHICS POLICY

DOCUMENT CONTROL

This Artificial Intelligence Governance and Ethics Policy is a controlled document within 3CIR's Integrated Management System. It is governed by the listed standards and forms part of the organisation's quality, environmental, and occupational health & safety framework.

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DOCUMENT TITLE	Artificial Intelligence Governance and Ethics Policy
VERSION	1.1
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REVIEW DATE	14 April 2027
APPROVED BY	CEO / COO
CLASSIFICATION	Controlled Document — v3.1 Corrected

APPLICABLE STANDARDS

ISO 9001:2015	ISO 14001:2015	ISO 45001:2018
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DOCUMENT NOTICE

IMPORTANT PREAMBLE

NEW DOCUMENT — April 2026: Created in response to External Audit Finding F-004. This policy addresses ASQA's explicit prohibition on AI in assessment decisions under the 2025 Standards for RTOs, and the Privacy and Other Legislation Amendment Act 2024 automated decision-making transparency obligations. This is a standalone AI governance policy providing specific, enforceable requirements in addition to the broader Digital Ethics Charter (3CIR-POL- GEN-002).

PURPOSE

01

3CIR Pty Ltd uses artificial intelligence (AI) tools and automated systems across its operations. This policy establishes a governance framework ensuring that AI is used ethically, legally, and in compliance with regulatory requirements — in particular the strict prohibitions on AI use in vocational assessment and training established by ASQA under the

STANDARDS FOR RTOS.

02

This policy applies to all 3CIR directors, employees, contractors, trainers, assessors, and any third party using AI tools on 3CIR's behalf.

DEFINITIONS

03

Artificial Intelligence (AI)	Any system or tool that uses machine learning, large language models, pattern recognition, or similar techniques to generate content, make predictions, or process information. Includes but is not limited to: Claude (Anthropic), ChatGPT (OpenAI), Google Gemini, Microsoft Copilot, and similar tools.
Automated Decision-Making	Any use of algorithms, rules engines, or AI to make or substantially influence decisions about individuals without direct human involvement — including decisions about student enrolments, assessment outcomes, communication prioritisation, and service delivery.
Assessment Decision	Any determination of competency, recognition of prior learning, credit transfer, grading, or pass/fail outcome in relation to a unit of
Validation	The quality review process for assessment tools, strategies, and decisions required under the 2025 Standards for RTOs, which must be conducted by qualified persons.
AI Tool / System	Permitted Use and Restrictions
Anthropic Claude	Administrative drafting (policies, procedures, communications, reports); content research; document formatting. NOT for: assessment decisions, student data analysis, or any decision affecting student outcomes.
Google Workspace AI features	Grammar checking, email drafting, calendar management. NOT for: assessment decisions or student data processing that affects outcomes.
GoHighLevel (GHL) automation	Marketing automation, CRM workflows, lead scoring, communication triggers. Human review required before any enrolment decision. To be assessed for Privacy Act disclosure by December 2026.
Make.com workflows	Administrative automation connecting platforms. Human review required for any workflow that affects student outcomes or enrolment status.
aXcelerate	Student Management System — records management, scheduling, reporting. Assessment decisions entered by humans only. System records outcomes; it does not determine them.

ASQA COMPLIANCE — AI IN ASSESSMENT: ABSOLUTE

04

PROHIBITION ASQA has explicitly stated in its March 2026 Practice Guides that: 'AI absolutely cannot be used to make assessment decisions; absolutely cannot be used to complete validation where qualified people are required.' This is a direct requirement under the 2025 Standards for RTOs. Breach of this requirement constitutes non-compliance with 3CIR's ASQA registration obligations and may result in regulatory action. There are NO exceptions to this rule.

3.1 PROHIBITED ACTIONS — TRAINERS, ASSESSORS, AND ALL STAFF

The following are PROHIBITED and constitute a serious breach of this policy:

- Using AI to make any assessment decision — including determining competency, granting or refusing RPL, setting grades, or making pass/fail determinations
- Using AI to complete validation activities — assessment tool review, strategy validation, benchmarking, and moderation must be conducted by qualified persons without AI substitution
- Entering student competency evidence into an AI tool to generate an assessment outcome or recommendation that is then used without independent qualified human review
- Using AI to generate student assessment responses, evidence portfolios, or RPL submissions on behalf of students — this is facilitation of academic fraud
- Using AI to make enrolment decisions — including determining eligibility for funded programs — without direct human review and sign-off
- Presenting AI-generated assessment documentation as if produced by a qualified trainer or assessor

3.2 REQUIRED PROCESSES WHEN AI IS USED ADJACENT TO ASSESSMENT

Where AI tools are used in tasks that are adjacent to (but not part of) assessment decisions, the following controls are mandatory:

- Any AI-generated content used in training delivery (learning resources, study guides, course materials) must be reviewed, edited, and authorised by a qualified trainer before use
- AI-assisted administrative tasks related to assessments (scheduling, formatting records, generating cover letters) must be reviewed by the responsible staff member before finalisation
- Where AI tools are used to draft assessment briefs, task books, or marking guides — these must be reviewed, tested, and authorised through 3CIR's normal document control process

APPROVED AI TOOLS AND THEIR PERMITTED USES

05

PRIVACY ACT 1988 (CTH) – AUTOMATED DECISION-MAKING

Obligations under the 2024 Amendment The Privacy Act 1988 (Cth) is the principal Australian privacy statute governing 3CIR's handling of personal information. The Privacy and Other Legislation Amendment Act 2024 (Cth) amends the Privacy Act 1988 and introduces new transparency requirements (APP 1 – effective 10 December 2026) for organisations that use personal information in automated decision-making processes that significantly affect individuals. 3CIR's obligations:

- By 30 June 2026: Complete audit of all automated systems (GHL, Make.com, aXcelerate, AI tools) to identify processes that use personal information to make or substantially influence decisions about individuals
- By 10 December 2026: Update the Privacy Policy (3CIR-POL-GEN-004) to disclose all in-scope automated decision-making systems and processes
- Ongoing: Assess any new automated system or AI tool before adoption for Privacy Act implications
- Responsibility: COO is responsible for the automated systems audit and Privacy Policy update

AI ETHICS PRINCIPLES

07

- Human accountability — all decisions affecting students, staff, or business outcomes are made and owned by humans
- Transparency — 3CIR discloses AI use in content development where relevant, and will disclose automated decision-making in the Privacy Policy from December 2026
- Fairness — AI tools are reviewed for bias and discriminatory outcomes before use in any context affecting students
- Data minimisation — student personal information is not entered into external AI tools (including Claude) as part of any workflow
- Security — AI tools with access to 3CIR systems must meet the same security standards as all other platforms
- Continuous review — AI tool approvals are reviewed annually and when new regulatory guidance is issued by ASQA or the OAIC

STAFF TRAINING AND AWARENESS

08

All staff receive AI governance training during induction covering: ASQA's prohibition on AI in assessment; approved and prohibited uses of AI tools; Privacy Act obligations; and how to report concerns. Training completion is recorded in the Training and Competency Matrix (3CIR-REG-HR-001). This policy is reviewed whenever ASQA publishes updated Practice Guides on AI use.

BREACH CONSEQUENCES

09

Breach of this policy — particularly the use of AI in assessment decisions — constitutes a serious breach of 3CIR's obligations under the 2025 Standards for RTOs and may result in: disciplinary action under the Enforcement Policy (3CIR-POL-HR-004); immediate removal from training and assessment roles; reporting to ASQA; and potential regulatory action against 3CIR's registration status. There are no exceptions.

REVIEW

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This policy is reviewed annually and immediately when ASQA issues updated guidance on AI use, or when the Privacy Act automated decision-making obligations (December 2026) require action.

AUTHORISATION & APPROVAL

This policy (3CIR-POL-GEN-011) is authorised and approved for release in accordance with 3CIR's Integrated Management System governance framework.

AUTHORISED BY

Marcella Knottenbeld

Chief Executive Officer

Signature

Date: / / 2026

AUTHORISED BY

Matthew Pitt

Chief Operating Officer & Director

Signature

Date: / / 2026

DOCUMENT CONTROL NOTICE

This is a controlled document. Printed copies are uncontrolled. Refer to the Document Control Register (3CIR- REG-IMS-001) to verify currency. Version 3.1 – corrected per External Audit Findings F-001 to F-015 – April 2026. Note: Signature block updated 22 April 2026 to reflect the current governance structure per 3CIR-REC-IMS-018 Governance Structure Formalisation Record v1.0. Document content and original effective date remain unchanged. This update is an authorised configuration correction, not a material revision of the document.

VERSION HISTORY NOTE

Note: Signature block updated 22 April 2026 to reflect the current governance structure per 3CIR-REC-IMS-018 Governance Structure Formalisation Record v1.0. Document content and original effective date remain unchanged. This update is an authorised configuration correction, not a material revision of the document.

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CORE VALUES

Courage · Commitment · Comradery
Integrity · Respect

CONNECT · LEARN · SUCCEED