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S U C C E E D

DIGITAL ETHICS CHARTER

DOCUMENT CONTROL

This Digital Ethics Charter 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.

DOCUMENT NUMBER	3CIR-POL-GEN-002
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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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PURPOSE

01

This Digital Ethics Charter establishes 3CIR Pty Ltd's ethical principles and obligations for the use of digital technologies, artificial intelligence (AI), data, and automation systems across all operations. It applies to all staff, contractors, trainers, and assessors who use digital tools in the course of their work for 3CIR.

SCOPE

02

This Charter applies to all digital systems and tools used by 3CIR, including but not limited to: Google Workspace, GoHighLevel (GHL), Make.com, aXcelerate, Supabase, Anthropic Claude AI, and any AI-powered or automated systems integrated into 3CIR's operations.

CORE DIGITAL ETHICS PRINCIPLES

03

- Human dignity — technology serves people, not the other way around. Every digital decision is made in the interest of students and workers.
- Transparency — we are open about how our systems work, what data we collect, and how decisions are made.
- Fairness — AI and automation must not discriminate, perpetuate bias, or disadvantage any person based on a protected attribute.
- Accountability — humans remain accountable for all decisions affecting students, staff, or business operations.
- Privacy by design — data minimisation, purpose limitation, and privacy protection are built into all digital systems from inception.
- Security first — all digital systems and data are protected by appropriate security controls.

DATA ETHICS

04

- Student data is collected only for defined, lawful purposes aligned with ASQA requirements and the Privacy Act 1988 (Cth)
- Student data is never sold, shared with unauthorised parties, or used for purposes beyond the stated collection purpose
- Data is retained for legislatively required periods and securely destroyed after that period
- Staff must not access student or employee data beyond what their role requires
- All data breaches must be reported to the COO within 4 hours of discovery — the Notifiable Data Breaches scheme (Privacy Act 1988 Part IIIC) imposes legal notification obligations to the OAIC

TECHNOLOGY USE STANDARDS

05

- All 3CIR systems must use multi-factor authentication (MFA)
- Personal devices used for 3CIR work must have screen locks activated and must not store 3CIR data locally without authorisation
- Public Wi-Fi must not be used to access 3CIR systems or student data without VPN
- AI tools (including Claude, ChatGPT, and similar) may be used for administrative, creative, and operational tasks — subject to the strict limitations in Section 7
- Digital communications (email, messaging, video) are conducted professionally and maintain confidentiality of student and commercial information
- 3CIR's automation systems (Make.com, GHL workflows) are documented and reviewed annually for privacy and security compliance

ETHICAL MARKETING AND COMMUNICATIONS

06

- All marketing materials accurately represent 3CIR's qualifications, services, outcomes, and costs
- No misleading claims are made about employment outcomes, qualification values, or study timelines
- Student testimonials are used only with written consent and are not manipulated or fabricated
- 3CIR does not engage in high-pressure sales tactics or predatory enrolment practices targeting vulnerable individuals
- All marketing complies with Australian Consumer Law (Competition and Consumer Act 2010 (Cth)) and ASQA student information obligations under the 2025 Standards for RTOs

AI AND AUTOMATED SYSTEMS — ASQA REQUIREMENTS

07

CRITICAL COMPLIANCE REQUIREMENT: ASQA has explicitly stated in its March 2026 regulatory guidance that AI absolutely cannot be used to make assessment decisions and AI cannot be used to complete validation where qualified people are required. This is a direct requirement under the 2025 Standards for RTOs and non-compliance constitutes a breach of ASQA registration obligations.

7.1 PROHIBITED USES OF AI IN TRAINING AND ASSESSMENT

The following uses of AI are strictly prohibited at 3CIR and by all contractors, trainers, and assessors:

- Using AI to make or substantially influence any assessment decision — including competency determinations, RPL decisions, and grading
- Using AI to complete validation activities where qualified persons are required by the

STANDARDS FOR RTOS

08

- Using AI to generate, assess, or authenticate student competency evidence without qualified human review
- Using AI to conduct moderation activities required under the 2025 Standards for RTOs
- Using AI to make enrolment eligibility decisions without human review and authorisation
- Allowing students to use AI to generate assessment responses and submitting these as evidence of their own competence — this is academic fraud

7.2 PERMITTED USES OF AI

AI tools may be used for the following purposes, subject to the principle that humans retain full accountability for all outputs:

- Administrative tasks: drafting communications, scheduling, data formatting, document production
- Educational content development: creating draft learning resources, course materials, and study guides — subject to human review, customisation, and quality assurance before use
- Research and information gathering: finding publicly available information, legislation, industry guidance
- Marketing and communications: drafting marketing content — subject to human review and accuracy checking
- Operational automation: Make.com workflows for administrative tasks that do not affect assessment or student outcomes decisions
- Internal operations: process documentation, policy drafting, procedure writing — all subject to human review and authorisation before adoption

7.3 AI TRANSPARENCY TO STUDENTS

- Where AI tools are used in developing or delivering learning resources provided to students, this must be disclosed in the relevant course materials
- Students must be informed that AI tools may not be used in completing their assessments — this prohibition must be clearly stated in enrolment documentation and assessment briefs
- 3CIR will not use AI to generate synthetic student data, fabricate competency evidence, or produce false assessments

AUTOMATED DECISION-MAKING — PRIVACY ACT 2024 OBLIGATIONS

09

The Privacy and Other Legislation Amendment Act 2024 (Cth) introduces new transparency obligations for automated decision-making. Under the amended Privacy Act (APP 1), organisations must disclose when personal information is used in automated processes that make decisions significantly affecting individuals. The transition period ends 10 December 2026. 3CIR has conducted an initial assessment of its automated systems:

CYBERSECURITY AND INCIDENT RESPONSE

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- All suspected cybersecurity incidents must be reported to the COO within 4 hours of discovery
- Affected devices must be isolated from networks immediately — do not power off
- Evidence must be preserved — do not delete files, emails, logs, or browser history
- The COO assesses whether an eligible data breach has occurred under the Notifiable Data Breaches scheme
- Post-incident review is conducted and improvements documented in the Incident Register (3CIR-REG-IMS-005)

REVIEW

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This Charter is reviewed annually by the CEO and COO, or sooner if triggered by: changes to ASQA AI guidance; Privacy Act regulatory developments; new AI tool adoption; or a cybersecurity incident.

AUTHORISATION & APPROVAL

This policy (3CIR-POL-GEN-002) 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

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CORE VALUES

Courage • Commitment • Comradery
Integrity • Respect

CONNECT • LEARN • SUCCEED