

Australis College Privacy Policy

Australis College Pty Ltd
RTO Number 31518

PURPOSE

Australis College adheres to the Privacy Act, Australian Privacy Principles and Queensland Information Privacy Act for collecting, storing and disclosing personal information as well as recognising the students' requirements to access timely and accurate information about their participation and progress.

SCOPE

This Policy is written in accordance with the Australian Privacy Principles (APPs) and is available to anyone seeking information on how Australis College manage the personal information that is collected for the purpose of training students in the VET industry. This policy may be viewed on the Australis College website.

LEGISLATIVE CONTEXT

[Standards for Registered Training Organisations \(RTOs\) 2015.](#)

[National Vocational Education and Training Regulator Act 2011.](#)

[Commonwealth Privacy Act 1988.](#)

[Privacy Amendment \(Private Sector\) Act 2000.](#)

[Australian Privacy Principles.](#)

[Queensland Information Privacy Act 2009](#), Privacy Principles- Part 1 and 3

[VET Student Loans Act 2016.](#)

[VET Student Loans Rules 2016.](#)

POLICY STATEMENT

1. INTRODUCTION

1.1 We (Australis College Pty Ltd) are a Registered Training Organisation (RTO 31518) and provide training, educational and related services across Australia. In the course of our business, there are circumstances where we collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.

1.2 We are committed to complying with the Privacy Act 1988 (Cth) (Privacy Act) in relation to all personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the APPs. The APPs set out the way in which personal information must be treated.

Effective date	Review by date	SOP policy number	Version	Page number
20/02/2017	20/02/2019	POL_SPP1	3.0	1
Australis College Privacy Policy_V3.0				

1.3 WHO DOES THE PRIVACY POLICY APPLY TO?

1.3.1 This policy applies to any person for whom we currently hold, or may in the future collect personal information.

1.4 WHAT INFORMATION DOES THE PRIVACY POLICY APPLY TO?

1.4.1 This policy applies to personal information. In broad terms 'personal information' is information or opinions relating to a particular individual who can be identified.

1.4.2 Information is not personal information where the information cannot be linked to an identifiable individual.

2. HOW DO WE MANAGE THE PERSONAL INFORMATION WE COLLECT?

2.1 We manage the personal information we collect in numerous ways such as:

- Implementing procedures for identifying and managing privacy risks.
- Implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure.
- Providing staff with training on privacy issues.
- Appropriately supervising staff who regularly handle personal information.
- Appointing a privacy officer within the business to monitor privacy compliance.
- Allowing individuals the option of not identifying themselves, or using a pseudonym, when dealing with us in particular circumstances.

2.2 We will take reasonable steps to destroy or permanently de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.

2.3 In limited circumstances, it may be possible for you to use a pseudonym or remain anonymous when dealing with us (for example, when making a general enquiry with us). However, if you would like to engage our Services, we will need your personal information in most instances in order to provide the Services to you. If you wish to use a pseudonym or remain anonymous, you should notify us when making first enquiries.

3. WHAT TYPES OF INFORMATION DO WE COLLECT AND HOLD?

3.1 PERSONAL INFORMATION.

3.1.1 We may collect and hold personal information about you, which may include:

- Sensitive information (see [3.2](#)).
- Contact information.
- Financial information.
- Date and place of birth.
- Employment arrangements and history.
- Academic and education history.

Effective date	Review by date	SOP policy number	Version	Page number
20/02/2017	20/02/2019	POL_SPP1	3.0	2
Australis College Privacy Policy_V3.0				

- Tax returns and tax file numbers.
- Banking details.
- Any other personal information required to perform the services for you.

3.2 SENSITIVE INFORMATION.

3.2.1 ‘Sensitive information’ is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.

3.2.2 We may collect sensitive information if it is relevant in providing the Services. The sensitive information we collect and hold about you may include any of the following:

- Health information.
- Racial or Ethnic origin.

3.2.3 We will not collect sensitive information without the individual’s consent to whom the information relates unless permitted under the Privacy Act.

4. HOW AND WHEN DO WE COLLECT PERSONAL INFORMATION?

4.1 Our usual approach to collecting personal information is to collect it directly from you. Australis College does not engage in, or condone on our behalf, any cold-calling or unsolicited collection of your information from third party sources.

4.2 We might also collect personal information in other ways, which may include:

- From employers.
- Through marketing and business development events.
- From marketing and student recruitment agencies.
- From employment agencies.
- From referrers (websites, training partners, other training organisations, employees, friends).
- From parents and guardians, if students are under the age of eighteen (18).
- From Tuition Assurance Scheme Operators.

5. HOW DO WE HOLD PERSONAL INFORMATION?

5.1 Our usual approach to holding personal information includes:

- Physically, at our premises (securely).
- Electronically:
 - On secure online servers.
 - On a private cloud (protected by SSL and hosted in Australia).
 - By a third party data storage provider.

5.2 We secure the personal information we hold in numerous ways, including:

Effective date	Review by date	SOP policy number	Version	Page number
20/02/2017	20/02/2019	POL_SPP1	3.0	3
Australis College Privacy Policy_V3.0				

- Keeping areas that contain personal information secure.
- Using secure servers to store personal information.
- Using unique usernames, passwords and other protections on systems that can access personal information.
- Regular backup of data processes to prevent loss of personal information.

6. WHY DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

- 6.1** We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which information is collected varies, depending on the particular service being provided, but is generally to:
- Provide training or educational services for you.
 - Assess eligibility for various government funding, assistance and credit transfers.
- 6.2** In the case of potential employees, the primary purpose the information is collected is to assess the individual’s suitability for employment.
- 6.3** Personal information may also be used or disclosed by us for secondary purposes that are within your reasonable expectations and that are related to the primary purpose of collection.
- 6.4** For example, we may collect and use your personal information:
- For research purposes (statistical data reporting).
 - To provide you with updates and invite you to events.
- 6.5** We may disclose personal information to:
- Government bodies (such as the Australian Taxation Office and state and federal departments of education).
 - Registered industry associations or bodies.
 - Tuition Assurance Scheme Operators.
 - Employers and recruiters.
 - Other service providers or referral partners in order to provide the Services to you, or to assist our functions or activities (such as your Job Service Advisors and law firms).
 - Our third party technology providers such as our data storage providers.
- 6.6** Otherwise, we will only disclose personal information to third parties if permitted in writing by you, where it is authorised by law, or will lessen or prevent a serious threat to your life, health, safety or the general public’s health, safety and welfare. Where any other organisation has presented a privacy agreement to you, and it has been signed, we will share relevant information as approved by you.
- 6.7** Should a student request for Australis College to discuss their information and progress with a nominated person they are required to complete a Privacy Consent Form and email this to student.services@australiscollege.edu.au.

Effective date	Review by date	SOP policy number	Version	Page number
20/02/2017	20/02/2019	POL_SPP1	3.0	4
Australis College Privacy Policy_V3.0				

7. WILL WE DISCLOSE PERSONAL INFORMATION OUTSIDE OF AUSTRALIA?

- 7.1** We generally do not disclose information to overseas recipients apart from storing limited information on a server located in New Zealand.
- 7.2** We take all reasonable steps to ensure that the service provider is committed to privacy and confidentiality obligations that are at least equal to the Australian Privacy Principles.

8. HOW DO YOU MAKE COMPLAINTS, AND ACCESS AND CORRECT YOUR PERSONAL INFORMATION OR CREDIT INFORMATION

- 8.1** It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

8.2 ACCESS TO INFORMATION AND CORRECTING PERSONAL INFORMATION.

- 8.2.1** You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.

- 8.2.2** We will grant you access to your personal information as soon as possible, subject to the request circumstances.

- 8.2.3** In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of your identity.

- 8.2.4** We may deny access to personal information if:

- We are unable to verify your identity.
- The request is unreasonable.
- Providing access would have an unreasonable impact on the privacy of another person.
- Providing access would pose a serious and imminent threat to the life or health of any person.
- There are other legal grounds to deny the request.

- 8.2.5** We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.

- 8.2.6** If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

8.3 COMPLAINTS.

- 8.3.1** If you wish to complain about an interference with your privacy, then you must follow the following process:

- The complaint must be firstly made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
- In the unlikely event the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

Effective date	Review by date	SOP policy number	Version	Page number
20/02/2017	20/02/2019	POL_SPP1	3.0	5
Australis College Privacy Policy_V3.0				

8.4 WHO TO CONTACT.

8.4.1 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following address:

Attention	Privacy Officer
Postal address	PO Box 331 SPRING HILL QLD 4004
Email address	hr@australiscollege.edu.au

9. CHANGES TO THIS POLICY

9.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.

9.2 If you have any comments on the policy, please contact the Privacy Officer with the contact details in section [8.4](#).

10. COMMUNICATION, TRAINING AND RECORDKEEPING

10.1 *For internal use only* - refer to the Communication, Training and Recordkeeping Procedure (PRO_SM6).

11. REFERENCES/SUPPORTING DOCUMENTS/DEFINITIONS

11.1 [Australian Privacy Principles](#). As of 12 March 2014; agencies and certain organisations must ensure that they abide by the 13 Australian Privacy Principles:

- 1) Open and transparent management of personal information
- 2) Anonymity and Pseudonymity
- 3) Collection of solicited personal information
- 4) Dealing with unsolicited information
- 5) Notification of the collection of personal information
- 6) Use or disclosure of personal information
- 7) Direct marketing
- 8) Cross-border disclosure of personal information
- 9) Adoption, use or disclosure of government related identifiers
- 10) Quality of personal information
- 11) Security of personal information
- 12) Access to personal information
- 13) correction of personal information

11.2 [Personal Information](#). The Privacy Act defines personal information as:

...information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

Effective date	Review by date	SOP policy number	Version	Page number
20/02/2017	20/02/2019	POL_SPP1	3.0	6
Australis College Privacy Policy_V3.0				

Common examples are an individual’s name, signature, address, telephone number, date of birth, medical records, bank account details and commentary or opinion about a person.

11.3 [Sensitive Information](#) is a type of personal information and includes information about:

- An individual’s racial or ethnic origin.
- Health information.
- Political opinions.
- Membership of a political association, professional or trade association or trade union.
- Religious beliefs or affiliations.
- Philosophical beliefs.
- Sexual orientation or practices.
- Criminal record.
- Genetic information.
- Biometric information that is to be used for certain purposes.
- Biometric templates.

11.4 Australis College Student Handbook.

11.5 Document and Data Retention Policy (POL_DM2).

11.6 Pre-qualifier Supplier Policy (POL_RP2).

11.7 Student Information Handling Procedure (PRO_SP1).

APPROVAL AND AUTHORISATION

Completion of the following signature blocks signifies who is responsible for the creation, implementation, review and approval of this policy.

	Name	Job title	Date
Prepared by	Lisa Street	Quality Auditor	08/09/2014
Owned by	Charlie Manchadi	Chief Financial Officer	08/09/2014
Approved by	Andrew Hetherington	Managing Director	08/09/2014

SUMMARY OF REVISIONS

Australis College is committed to maintaining systematic control over its documentation. This includes the accurate recording of amendments and versions of documents through the Version Control Register SmartSheet (<https://app.smartsheet.com/b/home>).

This policy document will be reviewed two (2) years from its effective date or sooner as required.

Date	Name	Job Title	Version Number
08/09/2014	Lisa Street	Quality Auditor	1.0
23/07/2015	Sharleen Ejlertsen	Quality Officer	2.0
13/07/2016	Lisa Street	Quality Auditor	2.1
20/02/2017	Sharleen Ejlertsen	Quality Officer	3.0