



Job ready training, **today.**

Australis College Privacy Policy

Australis College
RTO Number 31518

VISION

To be Australia's most trusted RTO.

MISSION

To provide exceptional industry-relevant training that creates real employment outcomes for our students.

VALUES

Student-focused | Innovation | Courage | Quality | Learning | Accountability | Health & Wellbeing

APPROVAL AND AUTHORISATION

Completion of the following signature blocks signifies whom 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	Taryn Miller	Human Resources Manager	08/09/2014
Approved by	Andrew Hetherington	Managing Director/ Chief Executive Officer	08/09/2014

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	1
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

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>).

Date	Name	Job title	Version Number
08/09/2014	Lisa Street	Quality Auditor	1.0
23/07/2015	Sharleen Ejlertsen	Quality Officer	2.0

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	2
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

PURPOSE

Australis College adheres to the Privacy Act and Australian Privacy Principles for collecting, storing, and disclosing personal information as well as recognising the students' requirements to access timely and accurate information of 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

Privacy Act 1988

Australian Privacy Principles

Standards for Registered Training Organisations (RTO's) 2015

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 Australian Privacy Principles (APPs). The APPs set out the way in which personal information must be treated.

Who does the privacy policy apply to?

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

What information does the privacy policy apply to?

- 1.4 This policy applies to personal information. In broad terms 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.5 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

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	3
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

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?

Personal information

- 3.1** 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.
 - Tax returns and tax file numbers.
 - Banking details.
 - Any other personal information required to perform the Services for you.

Sensitive information

- 3.2** ‘Sensitive information’ is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.
- 3.3** 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.

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	4
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

- 3.4** 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.
- 4.2** We might also collect personal information in other ways, which may include:
- From employers.
 - Through marketing and business development events.
 - From marketing agencies.
 - From employment agencies.
 - From parents and guardians, if students are under the age of 18.

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:
- 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.

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

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	5
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

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.
- 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 by the Privacy Act. 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

7. Will we disclose personal information outside 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.

Access to information and correcting personal information

8.2 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.

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

8.4 In keeping with our commitment to protect the privacy of personal information, we may not

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	6
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

disclose personal information to you without proof of your identity.

8.5 We may deny access to personal information if:

- 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.

8.6 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.

8.7 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.

Complaints

8.8 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.

Who to contact

8.9 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:

Privacy Officer: Privacy Officer
Postal Address: PO Box 331, SPRING HILL QLD 4004
Telephone Number: 1300 887 991
Email Address: hr@australiscollege.edu.au

9. Changes to the 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 **8.9** of this policy.

10. Communication and Training

10.1 Policy document is to be communicated to the team within **five (5) business days** of its approval and implementation.

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	7
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

10.2 Employees must read the policy document and sign the comprehension statement to confirm their understanding.

10.2.1 Training is readily available, if required and will be administered by the policy owner of this document or authorised delegate within **fifteen (15) business days** of communicating the document.

DEFINITIONS

[Australian Privacy Principles](#) As of 12 March 2014; agencies and 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

[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.

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.

[Sensitive Information](#)

Sensitive information is a type of personal information and includes information about:

- An individual's racial or ethnic origin.
- Health information.

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	8
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

- 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.

REFERENCES/SUPPORTING DOCUMENTS

Privacy Act 1988 <http://www.comlaw.gov.au/Details/C2014C00076>

Australis College Student Handbook <http://www.australiscollege.edu.au/students>

Australian Privacy Principles <http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles>

Standards for Registered Training Organisations (RTO's)2015 <http://www.comlaw.gov.au/Details/F2014L01377>

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	9
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				

Comprehension Statement

Policy document title	Australis College Privacy Policy		
Policy number	POL_SPP1	Version number	2.0
Effective date	23/07/2015	Review by date	23/07/2016

Key Principles

- Knowledge on the types of personal and sensitive information that Australis College hold for the primary use of training and assessing.
- May collect information from agents, employers, marketing agencies, JSA and government agencies, and parents of students under 18.
- Knowledge of ways in which Australis College store and secure personal information.
- We collect information for the purposes of providing training and educational services and accessing government funding.
- Personal information may be disclosed to third parties for the secondary purpose related to the primary purpose such as reporting to government bodies, contacting recruitment agencies and employers for employment opportunities.
- Students may request that their information and progress is discussed with a nominated person by completing a Privacy Consent Form and submitting this to student services.
- Knowledge of student’s rights to access their personal information. Proof of identity will be requested. Knowledge of when student’s access to information may be denied.
- Change of details form is available for students that need to correct their information recorded at Australis College. Refer to Student Information Procedure.
- Knowledge of Process for any Complaints relating to Privacy Concerns.

Declaration

I have read and understood this SOP and related key principles.

Name: _____

Signature: _____

Date: _____

Effective date	Review by date	SOP policy number	Version	Page number
23/07/2015	23/07/2016	POL_SPP1	2.0	10
Australis College Privacy Policy_V2.0				
Z:\POLICIES & PROCEDURES\PRIVACY\PRIVACY POLICY\Australis College Privacy Policy_V2.0.docx				