

# Privacy policy

January 2015

Workspace Training is committed to maintaining the privacy of students and staff in accordance with the *Privacy Act 1988*. This Act was amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, which includes 13 Australian Privacy Principles.

Our policies for complying with these Principles are set out below.

## **Australian Privacy Principle 1 — open and transparent management of personal information**

As an RTO, we need to collect certain types of personal information and hold it on record. We are also required to disclose some of this information to particular government departments and agencies.

The types of information we collect and hold are specified by the Australian Skills Quality Authority (ASQA) and the National Centre for Vocational Education Research (NCVER). These requirements apply to all RTOs, and are audited from time to time by ASQA.

We are also required to ask certain questions in our student enrolment forms and forward the details to the Department of Industry and the relevant state departments. This information is used by the departments for statistical purposes. In the case of government funded training it is also used to determine eligibility for funding.

## Disclosure of information

Workspace Training only makes the above information available to authorised people within the company in which the training is being conducted, and the relevant government departments or agencies that require it.

We do not disclose any personal information to overseas recipients, marketing firms, or anyone else who is not authorised to receive it.

## Privacy Complaints

If you have a complaint about a privacy matter, you should follow the procedure set out below.

1. Raise the matter with the CEO either verbally or in writing, stating the exact nature of the complaint, with as many details as possible.

2. Allow time for the CEO to investigate the complaint, which may require several days if other parties need to be contacted.
3. Discuss solution options with the CEO once the details have been investigated.
4. Receive a written report from the CEO on the outcome.

If you still feel that the outcome is unsatisfactory, you should refer the matter to the Office of the Australian Information Commissioner.

### **Australian Privacy Principle 2 — anonymity and pseudonymity**

This Principle allows individuals under some circumstances to use a pseudonym or to not identify themselves when dealing with an organisation.

However, as an RTO, we are exempt from this Principle by other laws that relate directly to our activities as an RTO – in particular, the *National Vocational Education and Training Regulator Act 2011* and the *Standards for Registered Training Organisations 2015*.

### **Australian Privacy Principle 3 — collection of solicited personal information**

We only collect personal information that is necessary for us to carry out our activities as an RTO and provider of training resources.

We only collect sensitive information from individuals when it is required by law in our role as an RTO. We ensure that the collection methods used are fair and lawful.

### **Australian Privacy Principle 4 — dealing with unsolicited personal information**

If we receive personal information that we did not ask for and is not necessary to our function as an RTO, we will destroy that information.

### **Australian Privacy Principle 5 — notification of the collection of personal information**

All personal information that we gather is collected on forms or documents that identify us as the recipient of the information. These documents contain our name and contact details, so that individuals can contact us if they wish to discuss the reasons why we need to hold the information and the methods we use to manage it.

### **Australian Privacy Principle 6 — use or disclosure of personal information**

Once we have collected personal information for a particular purpose, we will not use it for any other purpose unless it is reasonable for us to do so in carrying out our activities as an RTO and provider of training resources, or we are required by Australian law to disclose it to another authorised party.

### **Australian Privacy Principle 7 — direct marketing**

We will not use or disclose personal information for the purposes of direct marketing unless the individual would reasonably have expected us to use it for that purpose. Individuals are provided with a simple means of opting out from future direct marketing approaches.

### **Australian Privacy Principle 8 — cross-border disclosure of personal information**

We do not disclose any personal information to overseas recipients.

### **Australian Privacy Principle 9 — adoption, use or disclosure of government related identifiers**

In our functions as an RTO, we are required to use the Unique Student Identifier (USI) to identify students. The USI is a form of 'government related identifier' and its use is governed by the Department of Industry. We comply with all Department provisions and guidelines.

We do not use any other government related identifiers unless there is a legitimate reason for doing so – such as using an enrolling student's driver's licence as a form of identification in order to obtain a USI on their behalf.

### **Australian Privacy Principle 10 — quality of personal information**

We ensure that the personal information we collect is accurate, up-to-date and complete. This may mean that we need to phone an individual to check on the spelling of their name, clarify problems with their address or ask for missing items of information.

### **Australian Privacy Principle 11 — security of personal information**

Hard copy files relating to training, such as training records, assessment results, training plans and student enrolment forms, are kept in a filing cabinet in the CEO's office at the Workspace Training head office. The only people who have access to these files are the CEO and Administration Manager.

Electronic records are kept on the Workspace Training office computers. The only people authorised to use these computers are the CEO and the Administration Manager.

All electronic records are backed up once per week. The back-up hard drive is stored offsite in a secure location.

We are required by ASQA to keep all completed student assessment items for at least six months from the time the student's competence was assessed. During this period, these records are made available to authorised personnel from government agencies if they make that request.

After six months has elapsed, we are permitted by ASQA to destroy these files. This is done periodically by shredding the files in batches.

We are also required to maintain records of the students' results for at least 30 years, with sufficient details to enable us to reproduce qualifications or statements of attainment if required. These records are kept electronically on the Workspace Training office computers and back-up hard drive.

### **Australian Privacy Principle 12 — access to personal information**

Students who request to see the information we hold in their personal file will be given access to it, unless one of the 'exceptions to access' apply under this Australian Privacy Principle. Exceptions include situations where giving access would have an unreasonable impact on the privacy of other individuals, or where the request is frivolous or vexatious.

Requests for access to information should be made to the CEO or the Administration Manager.

### **Australian Privacy Principle 13 — correction of personal information**

We will ensure that all information we hold about individuals is accurate, up to date, complete, relevant and not misleading. If we are advised that any information does not meet these standards, we will take steps to update it as soon as is reasonably practicable.

If an individual advises us that information we have provided about them to another party does not meet these standards, we will notify the third party and correct the information as soon as is reasonably practicable.