

PRIVACY PROTECTION POLICY

Purpose

This Policy describes how EduNex Training collects, manages, uses, discloses, protects, and disposes of personal information in accordance with the thirteen Australian Privacy Principles (APPs) 2014 outlined in the Privacy Act 1988 (Commonwealth) -Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Scope

EduNex Training Employees, Students and Clients are required to follow this Policy.

Policy

EduNex Training is a Registered Training Organisation RTO:45283 with responsibility for delivering Vocational Education and Training. EduNex Training collects and stores personal information on our Students and Industry Clients. EduNex Training complies with the Privacy Act 1988 (Commonwealth).

Definitions

Under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012 (s6(1)), personal and sensitive information is defined as follows:

- Personal information: “information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.”
- Sensitive information: “(a) information or an opinion about an individual’s: (i) racial or ethnic origin, or (ii) political opinions, or (iii) membership of a political association, or (iv) religious beliefs or affiliations, or (v) philosophical beliefs, or (vi) membership of a professional or trade association, or (vii) membership of a trade union, or (viii) sexual preferences or practices, or (ix) criminal record, that is also personal information; or (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for the purposes of automated biometric verification or biometric identification; or (e) biometric templates”.

Authority to Collect and Store Information

EduNex Training is an approved Registered Training Organisation by the Australian Skills Quality Authority (ASQA). This registration is issued under the authority of the National Vocational Education and Training Regulator Act 2011. This Legislation requires EduNex Training to collect personal and sensitive information from its Students. This requirement is specified in the Data Provision Requirements 2012 which is one of five legislative instruments that EduNex Training must comply with as a condition of its registration.

The data provision requirements require EduNex Training to collect data from Students in accordance with the Australian Vocational Education and EduNex Training Information Statistical Standard (AVETMISS). This is a complex information standard that defines information about who the Student is, where the training is delivered and what they are studying. The Standards for Registered Training Organisations require EduNex Training to retain and store this information for up to 30 years and to report training activity to government agencies in accordance with mandatory reporting requirements.

Together these requirements form a statutory obligation to collect, store and report information of any Student participating in nationally accredited training. The publications referred to in this section can be accessed from the ASQA website.

Collection and Use

EduNex Training collects personal information, either directly or indirectly, that is reasonably necessary for, or directly related to its delivery of the services it offers. Some of the information collected may be regarded as 'sensitive' as defined by the Privacy Act.

Solicited Information

Contact information such as name, organisation, position, address, telephone, and email are collected for marketing, support services, mandatory reporting and for communicating with stakeholders as part of our day to day operation.

In addition to information collected regarding training activity, EduNex Training will also collect, store and report information relating to satisfaction surveys, complaint handling and on our client employers.

Names, addresses, phone numbers, emergency contact details, bank account details and other employment related information is collected from employees for the purpose of managing human resources. The management of staff personal information complies with this policy.

Collection Methods

Student personal and sensitive information as well as training activity information is prescribed by the AVETMIS Standard. This information is collected directly from our Students using enrolment forms which may be paper based or electronic and other administrative forms including but not limited to complaint forms, recognition application, request for refund, transfer application, etc. Much of this information is entered into our Student Management System Software called "VETtrak". Hard copy records are retained within our Student files.

Survey responses are collected using our Employer and Student Satisfaction Surveys which are issued electronically through our survey analysis software "SurveyMonkey".

EduNex Training staff's personal information is collected from individuals on employment commencement.

Sensitive Information

Personal information collected by EduNex Training that may be regarded as 'sensitive' under the Privacy Act includes:

- 'Disability' and 'long-term impairment status' (health); and 'indigenous status', 'language spoken at home', 'proficiency in spoken English', 'country of birth' (implies ethnic/racial origin). This information is specified in the AVETMISS data elements and is collected for the national VET data collections, national VET surveys, and may be collected for VET-related research.
- 'Dietary requirements' (health-related) are collected for event catering purposes only.
- Biographical information, which may contain information on 'affiliations' and 'membership of a professional or trade association' are obtained from key note speakers for event marketing purposes.
- 'Memberships of professional associations' and 'health and work injury information' is collected from EduNex Training employees for HR management purposes.

Direct Marketing

EduNex Training respects an individual's right not to receive marketing material and provides an option within communications and on its website for individuals to unsubscribe from receiving marketing material. EduNex Training conducts its marketing communications and dissemination of service information in accordance with Australian Privacy Principle 7 (Direct marketing), the Spam Act 2003 (in respect of electronic communications), and the Do Not Call Register Act 2006.

Google Analytics and Cookies

Google Analytics is a web service provided by Google Inc. Cookies are used to generate data on website activity and usage. The cookies, which include IP addresses, are transmitted to and stored in Google servers in the United States where they are used to compile web-use reports. Google may transfer this information to third parties, where required by law, or for information processing on its behalf. Google will not associate IP addresses with any other data held by Google. More information on Google's privacy policy can be found at: <https://www.google.com.au/intl/en/policies/privacy/>. It is possible to disable cookies by adjusting web-browser setting and to opt-out of Google Analytics (<https://tools.google.com/dlpage/gaoptout>). Doing so, however, may affect web-site functionality.

The EduNex Training web servers automatically log information such as server address, date and time of visit and web pages accessed. No personal information is recorded. These logs are used for website management and improvement.

Unsolicited Personal Information

If EduNex Training should receive unsolicited personal information, it will be treated and managed according to the Australian Privacy Principles.

Notification of Collection

EduNex Training aims to notify individuals of the collection of their personal information during the enrolment process.

- Enrolment Process – notification is provided to Students during the enrolment process. Individuals are also notified at the time of collecting personal information for events. A copy of the Department of Education and Trainings Privacy Notice is located at the end of this Policy.
- Student Handbook and Website - notification is provided to Students on their Privacy .
- Quality Indicator Surveys – notification is provided in the email of invitation to participate in the surveys and also at the time of collecting the information.
- EduNex Training Staff – Notification is provided on employment commencement.

Disclosure of Personal Information

EduNex Training does not disclose personal information other than for the purpose for which it was collected, or an individual has consented to a secondary purpose, or an individual would reasonably expect this (such as receiving communications about upcoming events), or if required by law.

EduNex Training may share personal information with the Commonwealth Government in accordance with Commonwealth contractual obligations. In these circumstances, EduNex Training will take reasonable steps to inform and seek consent from the individuals concerned and take all reasonable steps to ensure that the recipient handles the personal information according to the APPs.

EduNex Training does not sell its mailing lists to third-parties for marketing purposes.

EduNex Training does not disclose personal information to overseas recipients. While people around the world can access material published on our website, no statistical or research publications contain identifiable personal information.

Management of Personal Information

EduNex Training endeavours to ensure the personal information it collects and uses or discloses is accurate, up to date, complete and relevant. EduNex Training routinely updates the information held in its customer relationship management system. This includes confirming with Students who are returning for a new enrolment if their personal contact details have changed.

Access to and Correction of Personal Information

Individuals may, subject to the exceptions prescribed by the Australian Privacy Principles, request access to and correction of their personal information where this is collected directly from individuals by EduNex Training.

EduNex Training does not charge for giving access to or for correcting personal information. Requests for access to or correction of personal information should be made in accordance with the Student access to records policy.

Information Retention and Disposal

Personal information is held in electronic and paper format:

- Information collected from Student enrolment applications and survey responses is held in databases.
- Names and contact details of stakeholders are held in VETtrak and email contact lists.
- Names and contact details collected during the delivery of services may be held either in electronic form in EduNex Training document management system or in paper documents which are locked in cupboards and filing cabinets.

- Personal staff information is held in VETtrak and HR Management, Pay Roll database.
- Backup copies of all electronic files held in EduNex Training systems are kept in the event of system failure/loss. All backup copies of system files are secured.

EduNex Training retains personal information for 30 years. When personal information is no longer necessary for EduNex Training business functions, and it is lawful to do so, EduNex Training destroy the information.

Information Security

EduNex Training takes active steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

- EduNex Training systems and internal network are protected from unauthorised access using appropriate technologies. Most system data transferred over the internet is protected by Secure Socket Level protocol (SSL). The inherent risks associated with data transmission over the internet are, however, commonly acknowledged. Individuals, who do not wish to provide their personal information via the online website forms have the option of mailing this information to EduNex Training.
- Access to VETtrak is protected through user log-on and password, and assignment of user access rights.
- EduNex Training does not use any Third-party providers for the delivery of training services.
- EduNex Training premises and data storage systems are fully secured. EduNex Training practices clean-desk policy and locking workstations when working with personal information. Paper documents containing names and addresses are required to be locked away and shredded when destroyed. All hardware is properly 'sanitised' before disposal.

Complaints and Concerns

Complaints, concerns, or appeals about EduNex Training management of personal information should be directed in writing to EduNex Training CEO or General Manager. EduNex Training will respond in writing within 10 business days. Complaints received by EduNex Training will be managed in accordance with the Complaints Policy and Appeals Policy as located on the website at www.edunex.edu.au.

Under the Privacy Act 1988 (Privacy Act), Students also have the right to make a Complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of their personal information. More information about making a Privacy Complaint can be located at the website of the OAIC located at: <http://www.oaic.gov.au/privacy/privacy-Complaints>.

Privacy Notice

The Privacy Notice at Schedule 1 of the National VET Data Policy sets out privacy information a student needs to know before they enrol with a Registered Training Organisation (RTO). The RTO is responsible for providing this Privacy Notice to Students, usually as part of the enrolment process.

The Privacy Notice explains how personal information provided by the student may be collected, held, used or disclosed, together with training activity information. It also assists to establish a student's expectations of how their personal information and training data may be handled.

The Privacy Notice also makes it clear that the Notice is in addition to any other specific requirements RTOs are obligated to provide to their students, for example, under state or territory privacy laws.

The following is minimum mandatory content for inclusion in a Privacy Notice:

Under the *Data Provision Requirements 2012*, **EduNex Training** is required to collect personal information about you and to disclose that personal information to the National Centre for Vocational Education Research Ltd (NCVER). Your personal information (including the personal information contained on this enrolment form), may be used or disclosed by **EduNex Training** for statistical, administrative, regulatory and research purposes.

EduNex Training may disclose your personal information for these purposes to:

- Commonwealth and State or Territory government departments and authorised agencies;
- NCVER.

Personal information that has been disclosed to NCVER may be used or disclosed by NCVER for the following purposes:

- populating authenticated VET transcripts;
- facilitating statistics and research relating to education, including surveys and data linkage;
- pre-populating RTO student enrolment forms;
- understanding how the VET market operates, for policy, workforce planning and consumer information; and
- administering VET, including program administration, regulation, monitoring and evaluation.

You may receive a Student Survey which may be administered by a government department or NCVER employee, agent or third party contractor or other authorised agencies. Please note you may opt out of the survey at the time of being contacted.

NCVER will collect, hold, use and disclose your personal information in accordance with the *Privacy Act 1988* (Cth), the National VET Data Policy and all NCVER policies and protocols (including those published on NCVER's website at www.ncver.edu.au).