

PRIVACY POLICY PROCEDURE

P006 – Privacy Policy and Procedure V3.0

Purpose

Training Synergies is required to collect, use, store and disclose a range of personal information on students, employees and a range of other stakeholders. Training Synergies is committed to maintaining the privacy and confidentiality of all student and personnel records. Training Synergies complies with the Privacy Act 1988 (C'Wlth), including the 13 Australian Privacy Principles (APP) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 {C'Wlth}.

Policy and Procedure

- 1. Open and transparent management of personal information**
 - a. Training Synergies will publish this policy on its website
 - b. The policy will be included in Training Synergies student handbook, staff handbook and made available on request.

- 2. Anonymity and pseudonymity**
 - a. Individuals have the option to not identify themselves when dealing with Training Synergies, for example when requesting information on a course, website enquiries or anonymous complaints/feedback.
 - b. Individuals who wish to undertake nationally recognised training with Training Synergies will be required to disclose information of a personal nature as outlined in this policy.

- 3. Collection of solicited personal information**
 - a. Training Synergies will collect information you provide on enrolment into a nationally accredited course or on commencement of employment with Training Synergies. We may also collect information you provide on websites, enrolment forms, course materials and assessments.
 - b. Training Synergies may sometimes collect information, with your consent, from your employer, a job services provider, or other organisations where students may engage in placement for training and assessment purposes.
 - c. Training Synergies collects information of a personal and sometimes sensitive nature. Information we collect may include: Full name, date of birth, residential address, contact details, demographic information, ability/disability, employment details, educational background, indigenous background, concession status language, literacy and numeracy skills and educational/course progress. Training Synergies may also collect information on your next of kin or parent/guardian.

- 4. Dealing with unsolicited personal information**
 - a. Training Synergies only collects, uses and stores information which is directly related to the provision of training and assessment (for students) and information directly

related to the employment or engagement of contractors (for employees and contractors).

- b. Information which is received that is not related to training and assessment or employment with Training Synergies is destroyed in a safe and secure manner.

5. Notification of the collection of personal information

- a. Students and employees are notified when information is collected or sourced from third parties. Such notifications are expressed in enrolment forms, assessment tools and other written documents or implied in such circumstances such as workplace observations.

6. Use or disclosure of personal information

- a. Training Synergies only uses information for the provision of training and assessment and is required to disclose this information to a number of organisations such as:
 - i. Registering bodies such as the ASQA (National), VRQA (Victoria) or TAC (Western Australia),
 - ii. Government funding bodies in each state and territory and/or Commonwealth Government
 - iii. Apprenticeship Centres,
 - iv. Employers and Job Services Providers,
 - v. External auditors and our consultants,
 - vi. The Australian Taxation Office,
 - vii. Other entities required by law and in accordance with the Privacy Act 1988.
- b. Training Synergies will not disclose any personal or sensitive information to a third party except for the direct provision of training and assessment or in emergency and life threatening situations.

7. Direct Marketing

- a. Your personal information will never be sold to any marketing company or third party.
- b. Training Synergies may use your personal information to market directly to you only for the provision of further training and assessment with us.
- c. Training Synergies for only use your information if you have provided consent to use your information for this purpose and you have opted in to this type of communication.

8. Cross-border disclosure of personal information

- a. Training Synergies will not disclose your personal information to any entity outside of Australia unless you have provided your express written consent,
- b. All records will be kept in Australia,

9. Adoption, use or disclosure of government related identifiers

- a. Training Synergies is required to collect, in some circumstances, government related identifiers. We will not use these identifiers for any reason or purpose except for the explicit reason it is required {eg. Concession numbers, Tax File Numbers, Drivers Licence Number, etc)
- b. Training Synergies will only disclose government related identifiers where required by law or express consent has been given to disclose this information,

10. Quality of personal information

- a. Training Synergies collects information and ensures accurate up to date and complete.
- b. Training Synergies will take all reasonable steps to ensure that the information provided from individuals is correct and any third party information received can be verified for accuracy, currency and completeness.

11. Security of personal information

- a. All personal and sensitive information is always kept safe and secure, only people who are authorised may access this information.
- b. Personal and Sensitive information is protected from unauthorised access, interference, misuse, loss, modification, or disclosure.
- c. Destruction of personal and sensitive information is carried out by commercial document destructive companies and secure shredding of secure electronic deletion.

12. Access to personal information

- a. Individuals may request copies of information which is kept about them at any time free of charge. Training Synergies may charge for printing and postage in some circumstances.
- b. All requests for access to personal information must be in writing and the individual must be able to identify themselves and verify their identity prior to any information being disclosed.

13. Correction of personal information

- a. Individuals who feel that the information the RTO uses and stores is inaccurate or incomplete may request to have the information updated and corrected. Such corrections must be in writing.

Relevant standards

Standards for RTOs 2015

- **Standard 3.4, S.2, 6.5, 8.1, 8.5, 8.6**

Legislation

- The Privacy Act 1988 (C'With)
- The Australian Privacy Principles (APP), 2014 (C'With)