



Policy & Procedure Privacy Personal Information

ABN 62 079 606 045
RTO ID. 22066

V5 190922

Purpose

All Health Training respect the privacy of Personal Information which we hold. The purpose of this privacy policy is to give a clear understanding of the sort of personal information that AHT holds and how we protect this critical information for our students.

Scope

Provide relevant information about All Health Training Privacy Policy and processes to demonstrate compliance with requirements and sound management. Specifically to meet the requirements of:

- National Vocational Education and Training Regulator Act 2011; and
- ASQA Standards for Registered Training Organisations 2015; and
- Victorian Government's Skills First Program

AHT takes the privacy of participants seriously and complies with all legislative requirements. These include the Privacy Act 1988, 2014 amendments, the Australian Privacy Principles (APPs). This ensure that all students and clients rights are protected by law.

Information is only shared with external agencies such as the National VET Regulator to meet our compliance requirements as an RTO. All information is kept in the strictest confidence.

In some cases we are required by law or required by the Standards for NVR Registered Training Organisations to make learner information available to others such as the National Centre for Vocational Education and Research or ASQA. In all other cases, we will seek the written permission of the learner for such disclosure.

AHT is committed to maintaining the privacy and confidentiality of its RTO personnel and student records. AHT complies with the Privacy Act 1988 including the 13 Australian Privacy Principles (APPs) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Definitions

The *Privacy Act 1988* (Privacy Act) regulates the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information. Under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012, 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,
 - II. political opinions,
 - III. membership of a political association
 - IV. religious beliefs or affiliations,
 - V. philosophical beliefs
 - VI. membership of a professional or trade association,
 - VII. membership of a trade union,
 - VIII. sexual preferences or practices,
 - IX. criminal record, that is also personal information;
 - b) health information about an individual;
 - c) genetic information about an individual that is not otherwise health information;
 - d) biometric information that is to be used for the purposes of automated biometric verification or biometric identification; or
 - e) (e) biometric templates”.

Collection

Personal information from AHT students will be collected by fair and lawful means necessary for the purpose of enrolment and functions of AHT. AHT is committed to ensuring the confidentiality and security of all information provided by learners and staff.

This Policy is in accordance with:

- The Higher Education Support ACT 2003 (HESA);
- Amended 2014; Privacy Act 1988;
- Privacy Amendment (Enhancing Privacy protections) Act 2012;
- Information Privacy Act 2000 (Victoria);
- The Education and Training Reform Act 2006

Throughout the process of managing learner personal information, AHT is required to comply with a number of government legislations/policies. These include:

- Requirements under clause 23 Schedule 1A of HESA
- The Australian Privacy Principles set out in the Privacy Act 1988
- Freedom of Information Act 1982 (VIC).

In addition, AHT’s privacy policy and procedure provides a framework and instruction to staff regarding how AHT collects, stores, uses and disseminates learner personal information with reference to the record management system and the Victorian Freedom of Information ACT (1982)

AHT must collect personal information as part of the enrolment process for training. This information may be of a personal nature and can include details of educational background, employment history, and current employment status, and language, literacy and numeracy skills. The purpose

of this information is to allow AHT to develop effective training and assessment programs according to the needs of each individual.

Notifying the individual at collection

All Health Training state on both the website and hard copy application form the Victorian Government VET Student Enrolment Privacy Notice.

Collection of your data

All Health Training (TOID.22066) is required to provide the Department with student and training activity data. This includes personal information collected in the All Health Training (TOID.22066) enrolment form and unique identifiers such as the Victorian Student Number (VSN) and the Commonwealth's Unique Student Identifier (USI). All Health Training (TOID.22066) provides data to the Department in accordance with the Victorian VET Student Statistical Collection Guidelines, available at: <http://www.education.vic.gov.au/training/providers/rto/Pages/datacollection.aspx>

Use of your data

The Department uses student and training data, including personal information, for a range of VET purposes including administration, monitoring and planning. A student's USI may be used for specific VET purposes including the verification of student data provided by All Health Training (TOID.22066); the administration and audit of VET providers and programs; education related policy and research purposes; and to assist in determining eligibility for training subsidies.

Disclosure of your data

As necessary and where lawful, the Department may disclose VET data, including personal information, to its contractors, other government agencies, professional bodies and/or other organisations for VET- related purposes. In particular, this includes disclosure of VET student and training data to the Commonwealth and the National Centre for Vocational Education Research (NCVER).

Legal and Regulatory

The Department's collection and handling of enrolment data and VSNs is authorised under the Education and Training Reform Act 2006 (Vic). The Department is also authorised to collect and handle USIs in accordance with the Student Identifiers Act 2014 (Cth) and the Student Identifiers Regulation 2014 (Cth).

Survey participation

You may be contacted to participate in a survey conducted by NCVER or a Department - endorsed project, audit or review relating to your training. This provides valuable feedback on the delivery of VET programs in Victoria.

Consequences of not providing your information

Failure to provide your personal information may mean that it is not possible for you to enrol in VET and/or to obtain a Victorian Government VET subsidy.

Access, correction and complaints

You have the right to seek access to or correction of your own personal information. You may also complain if you believe your privacy has been breached. For further information, please contact All Health Training (TOID.22066) 's Operations Manager in the first instance by phone 03 9894 3900 or email admin@allhealthtraining.com.au

Further information

For further information about the way the Department collects and handles personal information, including access, correction and complaints, go to: <http://www.education.vic.gov.au/Pages/privacypolicy.aspx>

For further information about Unique Student Identifiers, including access, correction and complaints, go to: <http://www.usi.gov.au/Students/Pages/student-privacy.aspx>

Data Quality

AHT will take reasonable steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

Data security

AHT takes steps to protect the personal information we hold against interference, loss, unauthorised access, use, modification or disclosure, and against other misuse. When no longer required, personal information is destroyed in a secure manner, or deleted in accordance with AHT's Records Management Policy.

Unique Student Identifier

The personal details of individuals held by the Student Identifiers Agency will be protected by the Privacy Act 1988 (Cth). In addition, the Student Identifiers Act 2014 establishes a confidentiality scheme for the USI.

USI legislation requires that AHT keep all records concerning USIs protected from misuse, interference and loss, unauthorised access, modification and disclosure. It also provides for the Australian Information Commissioner to investigate any breach of the USI confidentiality initiative as if it is an interference with the privacy of an individual for the purposes of the Commonwealth Privacy Act.

A USI must not be used for any purpose other than those specifically allowed under the legislation.

Refer to the Unique Student Identifier Policy and Procedure for further information.

Access and correction under the Privacy Act

AHT will grant an individual's request for access to the personal information that AHT holds about them.

Individuals may also request that AHT correct any personal information about the individual that AHT holds. AHT will only update the information if it is satisfied the information it holds is incorrect. If AHT is satisfied that an individual's personal information is incorrect, AHT will take reasonable steps to correct that information to ensure that it is accurate, up-to-date, complete, relevant and not misleading.

A person requesting access to personal information will be accompanied for the entire time they are in possession of their personal information by the Operations Manager.

Marketing, Privacy & Data Storage

- Should you submit any of our contact forms, From time to time, we would like to contact you about our products and services, as well as other content that may be of interest to you.
- You can unsubscribe from these communications at any time by clicking 'unsubscribe' at the bottom of any email correspondence or by contacting us in writing, at admin@eht.edu.au
- All Health Training uses Hubspot CRM to store and manage your enquiry, application and part of your enrolment data. This includes when you:
 - interact with us on our websites or through other channels (for example, communicating with us or attending one of our courses and or events, contacting us via social media channels);
 - use our product and services

All Health Training is committed to protecting and respecting your privacy, and we'll only use your personal information to administer your account and to provide the products and services you requested from us.

You may visit the Hubspot CRM privacy policy for further detailed information. <https://legal.hubspot.com/privacy-policy>