



PRIVACY POLICY & PROCEDURE

PURPOSE

Training Australia First collects and stores personal information on our students and industry clients. Training Australia First complies with the Privacy Act 1988 (Commonwealth). This policy describes how Training Australia First collects, manages, uses, discloses, protects, and disposes of personal information in accordance with the thirteen Australian Privacy Principles (APPs) outlined in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

This policy and procedure contributes to compliance with Standard 3 of National Code 2018 Clause 3.6 and 8.5 of the Standards. As well as the legislative instrument Data Provision Requirements 2012 including the National VET Provider Collection Data Requirements Policy

POLICY

Authority to collect and store information

Training Australia First is an approved Registered Training Organisation by the Australian Skills Quality Authority. This registration is issued under the authority of the National Vocational Education and Training Regulator Act 2011. This legislation requires Training Australia First 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 Training Australia First must comply with as a condition of its registration.

The data provision requirements require Training Australia First to collect data from students in accordance with the Australian Vocational Education and Training Management 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 2015 require Training Australia First 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

Training Australia First 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.

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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 training activity, Training Australia First will also collect, store and report information relating to satisfaction surveys, complaint handling and 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, RPL application, request for refund, transfer application, etc. Much of this information is entered into our student management software called "VETtrak". Hard copy records are retained within our student files.

Survey responses are collected using our Employer and Learner Satisfaction Surveys which may be issued in hard copy and electronic format. These survey results are returned to the admin office and entered into our survey analysis software "SMART". Survey forms once entered into SMART are either destroyed if hard copy or permanently deleted if in electronic form.

Enquiry information from prospective students including personal contact information is collected directly from individuals who make data requests either by telephone or email in person or via our website.

Training Australia First personal information is collected from individuals on employment commencement.

Sensitive information

Personal information collected by Training Australia First 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 Training Australia First employees for HR management purposes.

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Direct marketing

Training Australia First 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. Training Australia First 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. It is not, however, Training Australia First practice to 'cold call' for the purpose of marketing its products and services.

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

Notification of collection

Training Australia First aims to notify individuals of the collection of their personal information before, or at the time of collection, or as quickly as possible thereafter. Notifications are usually in writing, but may be verbal for telephone help-desk services, or research conducted by telephone interview.

- Marketing – notification is provided on our application form. Individuals are also notified at the time of collecting personal information for events. A privacy notice is provided in Training Australia First's application form.
- Quality Indicator surveys – notification will be provided in the letter of invitation to participate in the surveys and also at the time of collecting the information (online or by telephone).
- Unique Student Identifier Number (USI) – students from January 2015 are required to have a Unique Student Identifier number. The USI links to an online account that contains all the training records of a student completed from January 2015. Training Australia First will need the USI number when the student enrolls in the course. Training Australia First can apply on student's behalf or can guide them to apply for one. The student will be required to sign a

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consent form which includes further information if they want Training Australia First to apply on their behalf.

- Training Australia First staff – Notification is provided on employment commencement.

Disclosure of personal information

- Training Australia First 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.
- Training Australia First may share personal information with the Commonwealth government in accordance with Commonwealth contractual obligations. In these circumstances Training Australia First 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.
- Personal Information- Information on how the data collected will be used is provided on Training Australia First's application form and also on the Letter of offer and written agreement.
- The student is required to sign the form/s in order to confirm that they understand how and why the data is collected and how it will be used.
- Training Australia First does not sell its mailing lists to third-parties for marketing purposes.
- Training Australia First 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

- Training Australia First endeavours to ensure the personal information it collects and uses or discloses is accurate, up to date, complete and relevant. Training Australia First 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 Training Australia First.
- Training Australia First 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 section under the Records Management policy.

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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 Training Australia First 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 Training Australia First systems are kept in the event of system failure/loss. All backup copies of system files are secured.

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

Information security

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

- Training Australia First 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 Training Australia First.
- Access to VETTrak is protected through user log-on and password, and assignment of user access rights.
- Third-party providers used by Training Australia First for the delivery of services are all located within Australia and are required to be compliant with the Australian Privacy Principles and offer appropriate safeguards to protect personal information.
- Training Australia First premises and data storage systems are fully secured. Training Australia First 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 or concerns about Training Australia First management of personal information should be directed in writing to Training Australia First Chief Executive Officer. Training Australia First will respond in writing within 10 business days. Complaints received by Training Australia First will be managed in accordance with the Complaints and Appeals Policy.

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DEFINITIONS

<p>Personal information:</p>	<p>“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.”</p>
<p>Sensitive information:</p>	<p>“(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”.</p>

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PROCEDURE

	Responsibility
Privacy Notices	
<ul style="list-style-type: none"> Ensure the NCVER privacy notice and declaration are included on the enrolment form https://www.education.gov.au/privacy-notice-and-student-declaration Ensure similar privacy notices and declarations are included on other forms that may be required to collect personal or sensitive information from individuals, and that these are only used In compliance with this Policy. International Student Agreements must set out the circumstances in which personal information about the student may be disclosed (in accordance with National Code 3.3.6) 	CEO/ Compliance Manager
Marketing Privacy	
Email marketing <ul style="list-style-type: none"> Ensure there is an opt-out option on all marketing emails and correspondence sent to individuals in relation to marketing. 	CEO/ Compliance Manager
Privacy of USI information	
USIs are collected on the Enrolment Form. Students are responsible for arranging their own USI. TAF does not obtain USI's on behalf of students.	SSR/ Admin officer
Access to Records	
<ul style="list-style-type: none"> Individuals may request to access their records by using the Request Form. Written requests should be submitted to Student Services & Records Manager. Requests may be from past or current students or other individuals. It may be to access records held in a file about a student, or access to a previously issued AQF certification document – refer to the Certification Policy & Procedure. Upon receiving a completed form, confirm the request is valid and has been made by the individual to which the records relate – check identification documents. Arrangements for provision of records should be made as suitable – mailing copies, providing a time for records to be viewed etc. Where records are to be mailed, they should only be mailed to the address that is held on file for that individual, unless alternate change of address information is provided along with proof of identity – such as a driver's license or utility bill. Where records are to be shown to an individual, the student must produce photo ID prior and this should be matched to the records held on file about the individual to confirm they are only viewing their own records. Keep a note on how the records were accessed on the individuals file. 	SSR/ Admin officer

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	Responsibility
<p>Amendments to records</p> <ul style="list-style-type: none"> • Where an individual requests for incorrect records held about them to be corrected they need to do so by filling out the student request form • If it is a change of address or contact details of a current student, they can use the Student Change of Details Form. • Upon receipt of a request form, consider whether the records held are correct or not. If the request is valid and records are incorrect, update records accordingly. • Do not update records if they are found to be correct already. • Advise the individual accordingly of the actions taken to follow up their request. 	<p>SSR/ Admin officer</p>

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