

Privacy and Confidentiality

Ringwood Training is committed to maintaining the privacy and confidentiality of its RTO, clients and staff. Ringwood Training complies with the Privacy Act 1988 including the Australian Privacy & Data Protection Act (PDP.) and any applicable codes of practice under it, for any act done or practice Ringwood Training engage in.

This policy ensures that all students and clients rights are protected by law.

Ringwood Training implements & practices a system that ensures our compliance with the PDP, any binding registered PDP code, and ability to attend to any enquiries or complaints.

This includes cooperating with Skills First and providing any assistance requested in relation to:

- resolving any complaint Skills First receive alleging a breach of the PDP Act or the Health Records Act about any Personal Information collect, used, held or disclosed by us that Ringwood Training provided in connection with the Skills First contract.
- Providing access to or amendment of any record of Personal Information collected, used, held or disclosed in connection with the Skills First contract following a request Skills First receive from an individual

Ringwood Training is required by multiple bodies to ensure privacy and confidentiality is held to the upmost importance, including Skills First, VRQA and the Standards for RTO's 2015 that we are bound by as a Registered Training Organisation.

NOTE: The PDP's are a supporting document to this policy and procedure and should be used as a related appendix. The PDP's include 10 Information Privacy Principles:

1. Collection
2. Use and Disclosure
3. Data Quality
4. Data Security
5. Openness
6. Access and Correction
7. Unique Identifiers
8. Anonymity
9. Transborder Data Flows
10. Sensitive Information

Please refer to <https://www.legislation.vic.gov.au/in-force/acts/privacy-and-data-protection-act-2014/030>

Ringwood Training will only collect personal information that is required for the purposes of employment or education, or in meeting Government reporting requirements.

In collecting any personal information Ringwood Training will ensure we have obtained the necessary consents in accordance with applicable Laws, including the PDP Act, The Heath Records ACT and (if applicable) the Privacy Act (1988)

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Ringwood Training retains a record of personal information for individuals with whom we undertake any form of business activity. Ringwood Training will collect, hold, use and disclose information from our clients and stakeholders for a range of purposes.

Students

In particular; Ringwood Training is required to collect, hold, use and disclose a wide range of personal and sensitive information on participants in Nationally Recognised Training programs. The information required is outlined in the National Vocational Education and Training Regulator Act 2011, and associated legislative instruments include:

- Standards for NVR Registered Training Organisations
- Data Provision Requirements 2012

Ringwood Training will collect the following information on students:

- First and surname
- Gender and sex
- Date of birth
- Address (including postal)
- Contact phone numbers
- USI details
- Emergency contact details
- Victorian Student Numbers (if applicable)
- Employment industry (if applicable)
- Employment status
- Country of birth
- Highest school level completed
- When they completed high school
- Highest qualification
- Residency, citizenship or visa status
- Collection of ID (various)
- Spoken languages
- Aboriginal and Torres Strait Islander status
- Information on education history
- Language, literacy and numeracy
- Disability status
- Relevant health information
- School status
- Prior qualifications

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Personal Information is collected using enrolment forms, pre-training review and student eligibility. Information is collected for:

- Determining funding eligibility
- Purposes of entering information onto our Student Management System (Axcelerate) for generating of personal files and training plans (but not limited too)
- Allowing internal staff and trainers to make initial contact, and further maintain contact during their studies
- Ensuring contractual requirements are met

Information is held in locked cabinets and secure rooms based at Ringwood Training's Ringwood campus. Files are also stored on the SMS (Axcelerate), which is safeguarded and protected by appropriate computer and server protection (virus protection). Our server is backed up on a regular basis. All computers at Ringwood Training are further safeguarded with an individual unique password for each user to logon to their computer profile and another individual login for Axcelerate access.

All student paperwork is held at Ringwood Training in hard copy for the length of time as required in our contractual obligations and destroyed after this timeframe (whichever is the longest). Please refer to our record retention procedure. Short course enrolment forms and related work completed by the individual is destroyed after 12 months. Axcelerate will manage all electronic records required for the purposes of training for a period of 30 years.

In the event our organisation ceases to operate, the required personal information on record for individuals undertaking Nationally Recognised Training with us would be transferred to the VRQA, as required by law and Skills First Funding contract obligations. If students request to transfer to another training organisation in these circumstances, Ringwood Training will fully comply to hand over all available training documentation, with a request in writing from the student granting permission to do so.

If students require access to their personal records held at Ringwood Training, they must make the request in writing to the Ringwood Training Administration Team. Individuals are able to contact by phoning (03) 9845 7560 or emailing admin@rt.vic.edu.au.

Third Party Arrangements – Students

In some cases, Ringwood Training may be required to provide personal information to third parties. Third parties may include:

- Job Services Providers
- Victorian Government Department (E.g. Skills Victoria, Australian Vocational Education and Training Management of Information Statistical Standard - AVETMISS) – for the purposes of uploading information to their specific individual needs on commencement of service delivery)
- Law enforcements
- Employers (Apprenticeship/SBAT contracts only)
- Secondary Schools for VET and SBAT students

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In all cases where access is requested, Ringwood Training will ensure that:

- Parties requesting access to personal information are robustly identified and vetted
- Where legally possible, the individual to whom the information relates will be contacted to confirm consent (if consent not previously provided for the matter); and
- Only appropriate authorised parties, for valid purposes, will be provided access to the information.

Each enrolment provides the individual with Ringwood Training's Privacy Statement, and under Victorian and Federal Privacy Legislation, students must be provided with this notice informing them about the ways their personal information will be collected and handled when they enrol for VET. Information on privacy and confidentiality is also provided with Ringwood Training's Student Handbook, which they also sign to confirm they have read and understood the information.

In particular, information is provided at this time that students may be invited to participate in the NCVET survey or be contacted by the department (or authorised persons) for audit purposes.

Staff

All staff are inducted either prior to or on their first day of employment. Part of the induction process is to inform and educate staff on the privacy and confidentiality requirements set by Ringwood Training to protect all clients associated with Ringwood Training (E.g. students, staff, and businesses).

All staff are required to have read and understood terms and conditions of employment, also acknowledge their understanding of this policy and procedure.

Ringwood Training will collect the following information on all staff members:

- First and surname
- Gender
- Date of birth
- Address (including postal)
- Contact phone numbers
- Emergency contact details
- Resume / CV
- Evidence of prior qualifications
- Banking details
- Residency, citizenship or visa status
- Collection of ID (various)
- Aboriginal, Torres Strait Islander?
- Disability status
- Relevant health information / medical action plans
- Skills Matrix (Trainer/Assessors only)
- Leave forms

All of the above information is held in electronic format and can only be accessed by the Centre Manager and Ringwood Training HR Admin Staff.

All staff details (not including invoices) are held continuously. All electronic records are safeguarded and protected by appropriate computer and server protection (virus protection). Our server is

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backed up on a regular basis. All computers at Ringwood Training are further safeguarded with an individual unique password for each user. The Centre Manager will ensure that access to any other information held on Y Drive is kept in a hidden folder, only accessible by the management team.

Ringwood Training will always collect sufficient information from staff in order to obtain the information required to meet employment, legal and taxation obligations. Ringwood Training Centre Manager will maintain information and details in relation to staff performance and appraisals, through Ringwood Secondary College's Professional Development Plan procedure, and yearly regular audits on all HR files.

Ringwood Training staff may request access to their personal information at any time, by directly asking the Centre Manager or HR admin staff.

Third Party Arrangements – Staff

There are occasions where staff's personal information will be shared with third parties. In summary, Ringwood Training will share information:

- For GST and tax purposes
- Requested by legal or law enforcements
- For the purposes of work cover, insurance and other claims
- As requested by a parent / guardian (if under the age of 18)
- Where signs of child abuse (under the age of 18) have been identified and need to be reported

Further Controls

Additionally, to all the above, Ringwood Training also ensure that effective control measures are put in place to ensure the correct information is collected, maintained and used for appropriate conditions.

Please note, any approvals from staff or students listed below, a parent/guardian will also need to co-sign if under the age of 18. This includes, but not limited to:

- Collecting and capturing images, testimonials and videos for the purposes of marketing and promotion. Ringwood Training currently ask students on their first day of training to sign for permission to use this (photo permission form). Individuals do not have to sign, and therefore will not be included in any promotion. This document is kept on file with the Administration Team.
- Further request to use testimonials is also asked
- Ringwood Training reviews the Privacy Policy and Procedure at least once per calendar year to identify any changes in legislation and enhancements for internal requirements
- Ensuring that all changes to the policy and procedure are widely communicated to stakeholders through internal personnel communications, meetings, training and documentation.
- Ensuring that the Privacy Policy and Procedure is always accessible on Ringwood Trainings website
- When receiving unsolicited personal information, Ringwood Training will promptly review the information and decided whether we should have collected the information for the purpose of our business activities. If we could not have collected this information (by law or for a valid business purpose) we immediately destroy or de-identify the information.

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- A security bin is placed in a RT Staff Only area for any private and confidential material to be destroyed. It is emptied on a regular basis.
- Ringwood Training will not directly market via phone or email to individuals without prior consent. For example – cold calling to residences.
- Have students complete a change of details form at the commencement of each year to verify the quality of personal information,
- On individuals request, we will correct personal information held, and further notify any third parties of corrections made to personal information (if this information was previously provided to these parties).
- Ensuring that Ringwood Training takes reasonable steps to correct personal information we hold in cases where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading. This awareness may occur through collection of updated information, in notification from third parties or through other means.

Ringwood Training also provide all users (staff and students) their own logins to all computer applications, including access to RT computers, Axcelerate, Electude & Moodle. Both staff and students are advised in the induction not to share these logins with anyone else.

Only the Centre Manager are able to reset student and staff logins and Admin can reset students.

If Ringwood Training become are of any:

- Breach of any Skills First contractual requirements under Privacy (12.5-12.7)
- Unauthorised disclosure, use, modification or access, attempted unauthorised disclosure, use, modification or access, or misuse or loss of any Personal Information collected or held for the purpose of the Skills First contract; or
- Act or practice of Ringwood Training's which causes Skills First to fail to comply with their obligations under PDP Act or Health Records Act

We will notify Skills First via the SVTS and cooperate with Skills First in any investigation or other steps they take in response to the matter.