

## 1. Purpose

- 1.1. This document outlines Integrity Education Group's commitment to protecting all students who interact with any aspects of the business and the way Integrity Education Group handles personal information in accordance with the Australia Privacy Principles set out in the Privacy Act 1988.

## 2. Scope

- 2.1. This Policy and Procedure applies to personal information collected by Integrity Education Group in relation to past and present staff, students, and prospective students.
- 2.2. All staff of Integrity Education Group may be directly affected by this Policy and Procedure.

## 3. Authority

- 3.1. The RTO Manager is responsible for effective implementation and management of this Policy. Any complaints or breaches in relation to this Policy and Procedure should be reported to the RTO Manager in person or by email to: [info@integrity.edu.au](mailto:info@integrity.edu.au). The RTO Manager will provide information on ways to resolve complaints of breaches of this Policy and Procedure.
- 3.2. The Training Manager and Operations Manager are responsible for consistent implementation of this Policy and Procedure and may provide advice on ways to resolve complaints of breaches of this Policy and Procedure.
- 3.3. This Policy and Procedure is issued on the authority of the CEO. The CEO has overall responsibility for the management and review of this Policy and Procedure. Any complaints or breaches in relation to this Policy that involve the RTO Manager should be reported to the CEO in person or by email to: [info@integrity.edu.au](mailto:info@integrity.edu.au).

## 4. Definitions

- **ASQA** means Australia Skills Quality Authority, the national VET regulator and the RTO's registering body.
- **Contract** means the VET Funding Contract for the Skills First Program issued by the Department.
- **Department** means the Victoria Department of Education and Training.
- **Eligible Student** means a student who is eligible for government subsidised training in accordance with the eligibility requirements set out in the VET Funding Contract and related guidelines.
- **Fee Payer** means the nominated payer of a student's course fees, usually either the student or the employer paying on behalf of the student.
- **Material Fee** means an amount that either fully or partly covers the cost of materials for the course.
- **Personal Information:** Personal information is defined under the Privacy Act as information or an opinion about an identified student, or a student who is reasonably identifiable:
  - whether the information or opinion is true or not, and
  - whether the information or opinion is recorded in a material form or not.
  - Some examples of personal information include names, addresses, phone numbers and email addresses. The definition of personal information only relates to 'natural' persons. It does not extend to other 'legal' persons, such as companies.

- **Privacy Act 1988** (Privacy Act) is an Australian legislation that regulates the handling of personal information about students. This includes the collection, use, storage, and disclosure of personal information. The Privacy Amendment (Enhancing Privacy Protection) Act 2012 introduced many significant changes to the Privacy Act, including 13 Australian Privacy Principles (APPs) that apply to the handling of personal information. As an Australian Government agency, ASQA is obliged to comply with the APPs.
- **Sensitive Information:** Under the Privacy Act, sensitive information is defined as information or an opinion about a student's:
  - racial or ethnic origin
  - political opinions
  - membership of a political association
  - religious beliefs or affiliations
  - philosophical beliefs
  - membership of a professional or trade association
  - membership of a trade union
  - sexual orientation or practices, or
  - criminal record.
  - Sensitive information that is also personal information
    - ◆ health information about a student or
    - ◆ genetic information about a student that is not otherwise health information or
    - ◆ biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or
    - ◆ biometric templates.
- **Skills First** means the Skills First Program funded by the Department.
- **Skills First Student** has the same meaning as Eligible Student.
- **SRTOs** means the Standards for Registered Training Organisations (RTOs) 2015
- **Tuition Fee** means the amount that Integrity Education Group charges for government funded students under the Skills First program for a course based on the rules issued by the Department.
- **Unique Student Identifier (USI)** is a unique reference number issued to a student by the Australian Government. It is made up of numbers and letters and enables a student to look up and track their training achievements in an online database.
- **Victoria Student Number (VSN)** is a nine-digit student identification number that will be assigned by the Department of Education and Early Childhood Development to all students in government and non-government schools, and students up to the age of 25 in Vocational Education and Training (VET) institutions.

## 5. Policy Statement

- 5.1. All Integrity Education Group staff are committed to handling personal information in accordance with the Australia Privacy Principles set out in the Privacy Act 1988.
- 5.2. Integrity Education Group will take all reasonable steps to protect the personal and sensitive information it holds.

## 6. Requirements, Process & Procedure

- 6.1. Collection of Information

- Personal information will not be collected unless:
  - The information is collected for a purpose directly related to the student; and
  - The collection of the information is necessary for or directly related to that purpose.
- Personal information will be collected prior to appointment. The types of personal information collected may include, however is not limited to:
  - Personal and contact details
  - Proof of identification
  - Resume
  - Awards
  - Bank details
  - Appraisals
  - Professional Development Plan
  - Employment contract
  - Other contracts
- In general, students' personal information will be collected through course application, the Pre- Training Review (PTR) process, enrolment forms, and training and assessment records. The types of personal information collected may include however is not limited to:
  - Personal and contact details
  - Proof of identification
  - Background information collected for AVETMISS statistical purposes about birthplace, language, culture, disability, prior education, schooling, employment, study reasons, residency status
  - Information required for the issuance of a USI
  - Information related to VSN
  - Consents and declarations
  - Language, literacy, and numeracy assessment
  - Training, participation, and assessment information
  - Attendance records
  - Intervention strategies
  - Academic Action Plan
  - Fees and payment information.
- Integrity Education Group may collect personal information directly from students either through personal interaction, print or electronic mediums including Integrity Education Group's website, surveys, and correspondences.
- Integrity Education Group will not collect sensitive information about a student without the explicit consent of the student or unless required by law. Health information may be collected if found necessary to prevent or lessen a serious and imminent threat to the life or health of any student.
- As the USI is a requirement for local/domestic students to enrol in and obtain competency records/AQF documentation, Integrity Education Group shall provide the prospective and enrolling students information about the process to register/apply for a USI on its website, handbooks, and during orientation. Where Integrity Education Group applies for a USI on

behalf of a student it will ensure that it has the authorisation of that student and has provided the required USI Privacy Notice as required under the Act.

- Integrity Education Group may also collect personal information about a student indirectly from Job Actives, Australia Apprenticeship Support Networks and Commonwealth and State agencies. Personal information will not be collected by unlawful or unfair means.
- Where personal information is collected for inclusion in a record or in a generally available publication Integrity Education Group will take reasonable steps to ensure that, before the information is collected or, if that is not practicable, as soon as practicable after the information is collected, the student concerned is generally aware of:
  - The purpose for which the information is being collected.
  - If the collection of the information is authorised or required by or under law the fact that the collection of the information is so authorised or required.
  - With whom the information may be shared - full details relevant to this are available on the Student Enrolment Form.
- Where Integrity Education Group solicits and collects personal information for inclusion in a record or in a generally available publication it will take reasonable steps to ensure that:
  - The information collected is relevant to that purpose and is up to date and complete.
  - The collection of the information does not intrude to an unreasonable extent upon the personal affairs of the student.

## 6.2. Use of Information

- Integrity Education Group will use the information for the primary purpose for which it is collected.
- Integrity Education Group may also use the information it holds for statistical purposes including research, analysis of trends and reports without compromising or disclosing identify of a student except as outlined in “Disclosure of Information” below.

## 6.3. Disclosure of Information

- Integrity Education Group provides the Privacy Policy and Procedure to all students through their website.
- Integrity Education Group also requires students to sign a declaration stating they understand who their personal information may be shared with prior to enrolment.
- Integrity Education Group will not without the prior consent of a student disclose personal or sensitive information about that student for a purpose other than the primary purpose of collection except in any of the following situations:
  - Integrity Education Group reasonably believes that the use or disclosure is necessary to lessen or prevent either of the following:
    - ◆ A serious and imminent threat to a student’s life, health, safety, or welfare.
    - ◆ A serious threat to public health, public safety, or public welfare.
    - ◆ Integrity Education Group has reasons to suspect that unlawful activity has been, is being or may be engaged in, and uses or discloses the personal information as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities.
    - ◆ The use or disclosure is required or authorised by or under law.
    - ◆ The prevention, detection, investigation, prosecution or punishment of criminal offences or breaches of a law imposing a penalty or sanction.

- ◆ The prevention, detection, investigation or remedying of seriously improper conduct.
- ◆ The preparation for, or conduct of, proceedings before any court or tribunal.
- ◆ The information is requested or sought by Australian law and enforcement agencies.
- Integrity Education Group will not without the prior consent of the Department share any information about the contract, funds paid per student or any other confidential information from the Department.
- The personal information about students enrolled in a course with Integrity Education Group may be shared with the Australian Government and designated authorities, such as the USI Registrar, The Higher Education and Skills Group and the National Centre for Vocational Education Research (NCVER). This includes personal details, contact details, course enrolment information, unit outcomes, AQF certification and statement issuance and information about training participation and progress.
- Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of public revenue, the record-keeper shall include in the record containing that information a note of the disclosure.
- A person, body, or agency to whom personal information is disclosed will not use or disclose the information for a purpose other than the purpose for which the information was given to the person, body, or agency.

#### 6.4. Access, Storage and Security of Information

- All Student information will be stored in secure locations either on Integrity Education Group's Student Management System, onsite secure file and archive room or secured offsite storage.
- All staff information will be stored on MS Teams Management folder to which only The Directors and the RTO Manager have access.
- Integrity Education Group will ensure:
  - That the record is protected, by such security safeguards as it is reasonable in the circumstances to take, against loss, against unauthorised access, use, modification, or disclosure, and against other misuse; and
  - That if it is necessary for the record to be given to a person in connection with the provision of a service to the VET Provider, everything reasonably within the power of the VET Provider will be done to prevent unauthorised use or disclosure of information contained in the record.
  - Reasonable steps will be taken to destroy any personal or sensitive information if it is no longer needed for any purpose.
- Integrity Education Group will maintain a Record Management Policy and Procedure to set out:
  - The nature of the records of personal information kept.
  - The purpose for which each type of record is kept.
  - The period for which each type of record is kept.
  - The persons who are entitled to have access to personal information contained in the records and the conditions under which they are entitled to have that access.
  - The steps that should be taken by persons wishing to obtain access to that information.
- Only staff and members of the organisation authorised by the Chief Executive Officer of Integrity Education Group will have access to the stored information for the specific purpose for which the access is required. Students may request access to their personal or sensitive

information held by Integrity Education Group by contacting the Chief Executive Officer. The Chief Executive Officer has the right to refuse access to the information if:

- o Providing access would have an unreasonable impact on the privacy of other students.
- o The request for access is frivolous or vexatious.
- o Providing access would be unlawful and/or compromise any ongoing or pending investigations or legal proceedings.
- o Any law and enforcement agency has request Integrity Education Group not to provide the access.

## 6.5. Privacy Breaches

- In the event of a Privacy breach, Integrity Education Group will take all reasonable action to prevent further breaches. This may include but is not limited to:
  - o Changing passwords.
  - o Having IT review internal systems for malware.
  - o Contacting external services to establish their involvement if any.
- Integrity Education Group will ensure that it notifies all effected parties including the Department within 3 business days of identifying the breach.

## 7. Related Documents

- PP024 Records Management Policy and Procedure
- PP015 Complaints and Appeals Policy and Procedure

## 8. Review Date

12 months from the date of this version, or as required.

## 9. Version History

Version	Date	Reason for change	Prepared by	Approved by
V1	October 2021	Initial Review	RTO Manager	CEO
V1.2	May 2022	Initial Review	Operations Manager	CEO
V1.3	June 2022	External Review	Barrie Campbell	RTO Manager