

Integrity Education Group takes our employees', trainers', clients' and students' right to privacy seriously¹.

The information collected may include contact details. This information is strictly confidential and will only be used for the purpose for which it was collected and no other purpose without the client's written authority.

Where activities are outsourced by Integrity Education Group, these companies are contractually bound to the same privacy levels we commit to our customers. Customers may request access to or modify their information on Integrity Education Group's database.

Employees

Integrity Education Group respects the privacy of our employees' personal information and our commitment to them is demonstrated by utilising the same principles required by Australia's privacy legislation for dealing with customer information (The National Privacy Act 2001) in the way we deal with their private information. This information is strictly confidential and will only be used for the purpose for which it was collected and no other purpose without their written authority.

We will collect from our employees, information including personal details, banking information, emergency contact details, and other information relating to their employment with us. We will also keep records of information obtained in the course of their employment, for example payroll records and appraisals.

This information is strictly confidential and is only available to those authorised to have access, such as their manager, other senior staff and those required to perform the administration activities. We undertake that the information we receive will be kept confidential and will not be passed on to another party without our employee's express permission or unless we are required to by law.

Where activities are outsourced by Integrity Education Group these companies are contractually bound to the same privacy levels we commit to our employees.

Our employees may request access at any time to the information we hold about them, and they may check its accuracy and request modifications.

Students

Principles

Student records are managed to ensure confidentiality and security of all information. Records are stored and archived in accordance with the requirements of the *NVR Standards for Registered Training Organisations 2015* and retained records are only retrievable for perusal by students if requested or by regulatory authorities for audit purposes (through application with the RTO CEO).

Personal information Collected

The personal information collected upon enrolment may includes a student's:

- name,

¹ This policy has been updated to incorporate obligations under the Australian Privacy Principles, which implement Schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, which amends the *Privacy Act 1988*. This policy also reflects information contained under the *NCVER Data Provision Requirements 2012*.

- address and contact details
- gender
- date and country of birth
- emergency contact
- employer's details
- employment status
- study reasons,
- disability status and assistance requirements
- indigenous status
- main language spoken
- educational history
- Unique Student Identifier (UIS) number,
- Verification of identity through a photo ID, and
- Citizenship/residency status (for government funded training).

Data Storage

Our students' personal information is stored securely on each of their student files in electronic format and they are only accessible by IEG staff with access permission. These staff members have agreed to the RTO's Code of Conduct for handling student records.

Student files also contain evidence of their training participation (i.e. signed attendance sheets), Training Plans, assessments and any communication pertaining to achievement of their results, withdrawal from their program, funding, progress against their Training Plans (e.g. file notes), etc.

Student files are automatically backed up daily to a data centre.

Each student's complete set of assessments is retained by IEG for a minimum of three years after they have been issued with their award; complementary to the academic appeals time period. After this time a student may request return of their assessments (through the RTO CEO); alternatively, they may be destroyed; with the Qualifications and/or Statements of Attainment issued being retained for a period of 30 years, as per our RTO obligations.

Sharing of Information

Personal information is required for the following purposes only:

1. for the receipt of public funding for training (i.e. a State Government requirement),
2. for the issuing of AQF certification documentation,
3. to fulfil our RTO obligations for statistical reporting,
4. to enable a National or State regulator to perform its monitoring and evaluation activities during an audit, and
5. so we are able to offer the best assistance possible for students to succeed in their training.

Client and student information will not be disclosed to overseas recipients.

All queries regarding student files, including the accessing of any information within it are to be directed in writing to the RTO Manager.

Student photographs

Student photographs will not be displayed publicly or included on any marketing or training materials without their individual prior written consent².

Breach of Privacy Concerns

If it is believed there has been a breach of the Australian Privacy Principles in relation to student files; staff, clients and participants are requested to contact the RTO Manager or CEO. IEG has a formal complaints procedure, and the matter will be dealt with accordance to this procedure promptly.

Unique Student Identifier

If a student would like IEG to apply for a USI on their behalf they must authorise us to do so and declare that they have read the privacy information at <https://www.usi.gov.au/documents/privacynotice-when-rto-applies-their-behalf>.

They must also acknowledge their reading of this information and provide consent through completion of the below, which is either contained within the RTO's enrolment form or provided on a separate form.

I have read and I consent to the collection, use and disclosure of my personal information (which may include sensitive information) pursuant to the information detailed on the USI website in relation to the creation of my USI.

In accordance with section 11 of the Student Identifiers Act 2014, IEG will securely destroy personal information which we collect from individuals solely for the purpose of applying for a USI on their behalf as soon as practicable after we have made the application or the information is no longer needed for that purpose.

Discipline under this policy

Management of Integrity Education Group has the responsibility of overseeing this policy. Supervisors and managers will ensure employees are compliant with all areas of this policy, including any disciplinary action resulting from non-compliance.

²The RTO will not publicly display any photographs of training participants under the age of 18 years and will not seek consent to do so.