



## **Privacy Policy & Procedure**

### **PURPOSE**

Acts 2 College of Mission & Evangelisation (Acts2CoME) adheres to the following Privacy Policy, which is applicable to all information that provided to Acts2CoME, whether the information is provided through Acts2CoME's website or through other means.

### **SCOPE**

This policy relates to all information produced by or collected by the National VET Data Policy and the Australian Privacy Principles (APP), also addressed in this document.

The Australian Privacy Principles are detailed in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 No. 197, 2012.

Acts2CoME ensures compliance with the National VET Data Policy and the APP at all times.

### **Policy**

#### **Acts2CoME's Promise to Protect Personal Information**

Acts2CoME understands the importance persons attach to personal information (such as name, address, date of birth, personal email address, etc.). Acts2CoME is committed to managing and protecting the personal information any persons (potential or existing learner) share with Acts2CoME.

Through this policy Acts2CoME seeks to ensure that all persons will be able to deal with Acts2CoME in the confidence that personal information is only used by Acts2CoME in ways that is legal, ethical and secure.

#### **Information Collection**

The information Acts2CoME collects from individuals will be dependent upon the functions that this person uses within the Acts2CoME website or other means of contact with Acts2CoME. Acts2CoME will not collect any information that individually identifies the person unless this person knowingly provides it to Acts2CoME.

Acts2CoME will only collect personal information that is necessary to carry out legitimate activities.

Information will be collected legally, fairly and in a way that is not intrusive.

Acts2CoME will take all reasonable steps to ensure, prior to collecting personal information, that the person is informed about Acts2CoME's identity, why Acts2CoME is collecting the

information as well as the person's rights to access their personal information held by Acts2CoME.

### **Types of information collected**

When a person enrolls in an Acts2CoME course, Acts2CoME is required to collect personal information as part of the enrolment process. This includes application for Recognition of Prior Learning (RPL) or Credit Transfer (CT).

The enrolment form will collect details of a personal nature (e.g. date of birth, address, contact details, unique student identifier) to ensure the identity of the individual and for the collection of accurate information pertaining to the course enrolment.

Further to this, personal information for Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) requirements for collecting information will be included on the enrolment form.

This information is of a personal nature and will include but it not limited to details of language and cultural diversity, disability, schooling, previous qualifications and employment.

The collection of this information will also assist Acts2CoME in ensuring appropriate support needs are identified and effective training and assessment arrangements can be made on an individual basis as required.

Persons visiting the Acts2CoME website may be able to access other sites by clicking on links that Acts2CoME embeds within its website.

Persons should be aware that other sites may not be subject to the same privacy standards and procedures as Acts2CoME. Acts2CoME does not take responsibility for persons choosing to visit these other sites.

**Note:** Acts2CoME only collects personal information necessary for enrolment and reporting purposes.

### **Provision of details**

Information submitted digitally to Acts2CoME (e.g. using an electronic enrolment form or by sending an email) is collected and used only for the purposes for which it is provided.

When a person makes an enquiry about an Acts2CoME course through the Acts2CoME website, Acts2CoME will use the information to process the enquiry. In this case the person making the enquiry may elect to use a pseudonym (e.g. preferred name, alias, nickname etc.).

When a person makes the decision to enrol in an Acts2CoME course and completes an enrolment form, the person must use their full legal name for this enrolment to be processed.

Acts2CoME will only issue certificates and statements of attainment with the legal name registered and verified by Acts2CoME against the unique student identifier (USI) register.

Acts2CoME will take all reasonable steps to make sure that personal information is accurate, complete and up-to-date at the time of collection and use. It is the responsibility of the individual to ensure Acts2CoME is provided with updated personal information as it changes (e.g. change of name or address etc.).

All enrolment forms must be signed by the individual stating the information provided is true and correct at the time of submission.

If an individual's details have changed (e.g. name change due to marriage) they will need to inform Acts2CoME in writing to request the personal information to be updated. Changes to identification will require the individual to provide acceptable ID to prove their identity (e.g. Marriage certificate).

### **Use of Information**

The personal information gained during the enrolment process will not be released to any third party for marketing.

Primarily Acts2CoME will use this information to provide the person with the services available through Acts2CoME.

- in the case of an enquiry, or for RTO data collection and reporting requirements
- in the case of an enrolment.

Acts2CoME employees will use individual's contact details to assist in the administering of its courses.

In this way, Acts2CoME is able to ensure all interested persons are informed (e.g. relevant Trainer and Assessor, Funding body etc.).

In addition, Acts2CoME may use information collected as above to provide or offer further services and products.

Persons not wanting to receive such information may contact Acts2CoME and request such contact be cancelled.

Acts2CoME will provide reasonable opportunity for an individual to opt-out of any activity that makes use of their personal information (e.g. learners receiving updates from Acts2CoME regarding upcoming specials via email – will be provided with the opportunity to contact Acts2CoME and request such contact be cancelled should they not want to receive this information).

Learners personal information (including the personal information contained on this enrolment form), may be used or disclosed by Acts2CoME for statistical, administrative, regulatory and research purposes. Acts2CoME may disclose your personal information for these purposes to:

- Commonwealth and State or Territory government departments and authorised agencies; and
- NCVER.

Personal information that has been disclosed to NCVER may be used or disclosed by NCVER for the following purposes:

- populating authenticated VET transcripts;
- facilitating statistics and research relating to education, including surveys and data linkage;
- pre-populating RTO student enrolment forms;

- understanding how the VET market operates, for policy, workforce planning and consumer information; and
- administering VET, including program administration, regulation, monitoring and evaluation.

Students may receive a survey administered by a government department or NCVET employee, agent or third-party contractor or other authorised agencies. Students may opt out of any such survey at the time of being contacted.

NCVER will collect, hold, use and disclose your personal information in accordance with the Privacy Act 1988 (Cth), the National VET Data Policy and all NCVET policies and protocols (including those published on NCVET's website at [www.ncver.edu.au](http://www.ncver.edu.au)).

### **Disclosure of Information**

Acts2CoME will not disclose personal information to any external company or third party unless the individual has consented to the use or disclosure (e.g. a learner requests in writing that their progress and results be provided to a potential employer) unless the learners training has been paid by their employer as detailed in the National VET Data Policy from 1 January 2018.

Personal information will not be sold to anyone and will not be used for promotions independent of Acts2CoME.

Personal information will be destroyed, if there is no longer any legitimate purpose in retaining such information and that the record retention periods imposed by the State and Federal Governments have been exceeded.

Acts2CoME will only disclose personal information when Acts2CoME are required to co-operate with investigations of alleged unlawful activities and conform to the proclamations of the law or comply with legal processes served on Acts2CoME.

Acts2CoME will also disclose personal information to fulfil a user's request. For an individual to obtain copies of their personal information to be distributed they must request a copy in writing to Acts2CoME using the **Student Information Release Form – 2019** to grant permissions.

Once Acts2CoME has received a written request the information can then be released.

### **Access to Personal Records**

Acts2CoME students will have access to all their personal information by request but will not be allowed to access any information that may breach the privacy of other persons. Where such a situation might occur, the details will be provided to the student requesting the information in a format (written, verbal, statistical) that meets his/her needs but ensures the privacy of other individuals is maintained.

Other organisations may only have access to specific and private information where a client agrees to the release of their information, unless the student's training has been paid by his/her employer as detailed in the National VET Data Policy from 1 January 2018. Information

may be provided to statutory authorities such as the ATO where there is a legal obligation to provide it.

To gain access, a student will be required to request this information in writing to Acts2CoME.

### **Storage of Information**

Acts2CoME is required to securely retain and be able to produce in full at audit or by the National Regulator, the Australian Skills Quality Authority (ASQA), if requested to do so, all completed learner assessment items for a period of twelve (12) months from the date on which the judgement of competence for the learner was made. After this timeframe records will be stored for another twelve (12) months then destroyed after a Compliance check is carried out against the electronic copy.

All records are stored on Dropbox, and a backup copy of the data is stored offsite.

Restricted access is enforced on files that hold sensitive information to ensure authorised access only.

Acts2CoME will at all times take reasonable steps to ensure the security of physical files (including student files), computers, networks and communications are maintained.

Where sensitive information is concerned (e.g. credit card details, work related documents with confidentiality requirements) information will be shredded once the retention period has expired.

Should Acts2CoME cease to trade, fail to renew its registration, etc. all relevant documents including student records will be transferred to the National Regulator.

The storage of records of Acts2CoME shall include:

- All student records including attendance, training delivered, assessment, results, issue of certificates and qualifications, other relevant data and correspondence with students unless such storage contravenes the Privacy Principles and National VET Data Policy set by ASQA or another Regulatory Authority such as the Australian Taxation Office, etc.
- Relevant correspondence with ASQA, other authorities, RTO's, institutions, entities or individuals
- Financial records
- Complaint, incident, and safety registers.

The National Regulator shall:

- Have access to all records

### **Further Information**

If any persons reading this Privacy Policy have any queries about the privacy and security procedures for Acts2CoME, please contact Acts2CoME on 0401692690.

Any persons believing their personal information has not been dealt with in accordance with any part of this Privacy Policy, the National VET Data Policy or the Australian Privacy

Principles, a written complaint can be directed to Acts2CoME. Complaints should be addressed to the Acts2CoME Compliance Officer or Principal.

**DOCUMENT REVISION HISTORY**

<b>Version Number</b>	<b>Author</b>	<b>Date Published</b>	<b>Description</b>
1.2	Jane Borg		
2.0	Karl Durham		Re-developed policy and procedure and as part of continuous improvement, template changes, font changes and added document revision table.
2.1	Karl Durham	14/07/2020	Included reference to separate APP Privacy Policy document.