

Privacy Protection Policy	
CLAUSE REFERENCE	Chapter 2 – Enrolment 5.1 to 5.3 – Informing and protecting students
PURPOSE	<p>Smart Training and Consulting is a Registered Training Organisation with responsibility for delivering vocational education and training. Smart Training and Consulting collects and stores personal information on our students and industry clients. Smart Training and Consulting complies with the Privacy Act 1988 (Commonwealth). This policy describes how Smart Training and Consulting 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. For further information visit the following sites. Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012</p> <p>Authority to collect and store information</p> <p>Legislation requires Smart Training and Consulting 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 Smart Training and Consulting must comply with as a condition of its registration.</p> <p>The data provision requirements require Smart Training and Consulting to collect data from students in accordance with the Australian Vocational Education and Smart Training and Consulting 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 require Smart Training and Consulting 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.</p> <p>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.</p>
SCOPE	<p>This policy applies to:</p> <p>All Smart Training and Consulting Group employees and covers the privacy of all Smart Training current, potential and past students</p>
GOVERNING PRINCIPLES <i>What are the policy directives?</i>	<p>Collection and use</p> <p>Smart Training and Consulting 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.</p> <p>Solicited information</p>

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, Smart Training and Consulting will also collect, store and report information relating to satisfaction surveys, complaint handling and on our 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, recognition application, request for refund, transfer application, etc. Much of this information is entered into our student management system. Hard copy records are retained within our student files.

Survey responses are collected using our Employer and Student Satisfaction Surveys which are issued both in hard copy and electronic format. These survey results are returned to the main office and entered into our survey analysis software "Satisfaction Data". Survey forms once entered into Satisfaction Data 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.

Smart Training and Consulting personal information is collected from individuals on employment commencement.

Sensitive information

Personal information collected by Smart Training and Consulting 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 Smart Training and Consulting employees for HR management purposes.

Direct marketing

Smart Training and Consulting 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. Smart Training and Consulting 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, Smart Training and Consulting practice to 'cold call' for the purpose of marketing its products and services.

Unsolicited personal information

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

Notification of collection

Smart Training and Consulting 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 website. Individuals are also notified at the time of collecting personal information for events.
- Quality Indicator surveys – notification is provided during the pre-enrolment phase and also at the time of collecting the information
- Smart Training and Consulting staff – Notification is provided on employment commencement.

Disclosure of personal information

Smart Training and Consulting 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.

Smart Training and Consulting may share personal information with the Commonwealth government in accordance with Commonwealth contractual obligations. In these circumstances, Smart Training and Consulting 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.

Smart Training and Consulting does not sell its mailing lists to third-parties for marketing purposes.

Smart Training and Consulting 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

Smart Training and Consulting endeavours to ensure the personal information it collects and uses or discloses is accurate, up to date, complete and relevant. Smart Training and Consulting routinely updates the information held in its student 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 Smart Training and Consulting.

Smart Training and Consulting 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 policy.

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 within the student management system and email contact lists.
- Names and contact details collected during the delivery of services may be held either in electronic form in Smart Training and Consulting document management system or in paper documents which are locked in cupboards and filing cabinets.
- Personal staff information is held within the student management system and HR management, pay roll database.
- Backup copies of all electronic files held in Smart Training and Consulting systems are kept in the event of system failure/loss. All backup copies of system files are secured.

Smart Training and Consulting retains **personal** information for 30 years. When personal information is no longer necessary for Smart Training and Consulting business functions, and it is lawful to do so, Smart Training and Consulting destroy the information.

Information security

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

- Smart Training and Consulting 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 Smart Training and Consulting.
- Access to the student management system is protected through user log-on and password, and assignment of user access rights.
- Third-party providers used by Smart Training and Consulting 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.

	<ul style="list-style-type: none"> - Smart Training and Consulting premises and data storage systems are fully secured. Smart Training and Consulting 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. <p>Complaints and concerns</p> <p>Complaints or concerns about Smart Training and Consulting management of personal information should be directed in writing to Smart Training and Consulting RTO Operations Manager. Smart Training and Consulting will respond in writing within 14 business days. Complaints received by Smart Training and Consulting will be managed in accordance with the Complaints and Appeals and Appeals Policy.</p>
<p>RELATED Forms and Tools</p>	<p>Student handbook</p> <p>Application Pack</p> <p>Enrolment form</p>
<p>RELATED LEGISLATION</p>	<p>Privacy Act 1988</p> <p>Privacy Amendment (Enhancing Privacy Protection) Act 2012</p>