

# Privacy Policy

First In Team and Safety Corp takes the privacy of our Students very seriously and we will comply with all legislative requirements.

These include the Privacy Act and Australian Privacy Principles January 2014

<http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-factsheet-17-australian-privacy-principles>

In some cases, as required by law and as required by the NVR Standards we will need to make your information available to others. In all other cases we ensure that we will seek the written permission of the Student.

## Privacy Principles

The Privacy Principles are listed below, with the open and transparent management of personal information defined:

1. **Australian Privacy Principle 1- open and transparent management of personal information**
  - a. **Collection** - We will collect only the information necessary for one or more of our functions. The individual will be told the purposes for which the information is collected.
  - b. **Use and disclosure** - Personal information will not be used or disclosed for a secondary purpose unless the individual has consented or a prescribed exception applies
  - c. **Data quality** - We will take all reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date
  - d. **Data Security** - We will take all reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure
  - e. **Openness** - We will document how we manage personal information and when asked by an individual, will explain the information we hold, for what purpose and how we collect, hold, use and disclose the information
  - f. **Access and correction** - The individual will be given access to the information held except to the extent that prescribed exceptions apply. We will correct and update information errors described by the individual.
  - g. **Unique Identifiers** - Commonwealth Government identifiers (Medicare number or tax file number) will only be used for the purposes for which they were issued. We will not assign unique identifiers except where it is necessary to carry out our functions efficiently
  - h. **Anonymity** - Wherever possible, we will provide the opportunity for the individual to interact with external agencies without identifying themselves
  - i. **Trans-border Data Flows** - The individual's privacy protections apply to the transfer of personal information out of Australia

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- j. **Sensitive Information** - We will seek the consent of the individual when collecting sensitive information about the individual such as health information, or information about the individual's racial or ethnic background, or criminal record

2. **Australian Privacy Principle 2—anonymity and pseudonymity**
3. **Australian Privacy Principle 3—collection of solicited personal information**
4. **Australian Privacy Principle 4—dealing with unsolicited personal information**
5. **Australian Privacy Principle 5—notification of the collection of personal information**
6. **Australian Privacy Principle 6—use or disclosure of personal information**
7. **Australian Privacy Principle 7—direct marketing**
8. **Australian Privacy Principle 8—cross-border disclosure of personal information**
9. **Australian Privacy Principle 9—adoption, use or disclosure of government related identifiers**
10. **Australian Privacy Principle 10—quality of personal information**
11. **Australian Privacy Principle 11—security of personal information**
12. **Australian Privacy Principle 12—access to personal information**
13. **Australian Privacy Principle 13—correction of personal information/or phone.**

## Collection of information

First In Team and Safety Corp requests information from students as part of the pre-enrolment, enrolment and any re enrolment processes. First In Team and Safety Corp staff will not collect personal information at any time by unlawful or unfair means.

First In Team and Safety Corp will always take reasonable measures to ensure that the individual is made aware of why personal information is being collected and what it could be used for.

First In Team and Safety Corp will only collect students' personal information for the following purposes:

- a. For the essential communication for the student's safety and comfort during their studies
- b. When it is necessary for First In Team and Safety Corp to make contact with a student's nominated family member in the case of emergency or accident.

Selected student details are also collected and used for:

- c. Processing enrolments
- d. Enquiries regarding courses available and sending out course information
- e. Communicating accurately with students
- f. Assisting students with courses they may be interested in
- g. Assisting students with RPL applications
- h. Student account details
- i. Assessing an individual student's entitlements for government funded areas.

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First In Team and Safety Corp will ensure that when personal information is collected it will not intrude to an unreasonable extent into the personal affairs of the prospective student / employee and that the information is up to date and complete.

## Disclosure of information

Privacy and confidentiality is paramount within First In Team and Safety Corp and policies and procedures will be observed by all staff. Personal information will not be released without the consent of the student.

First In Team and Safety Corp does not release or sell students' personal details to any external companies for the purposes of marketing.

First In Team and Safety Corp may from time to time be required to provide personal information to external organisations including the Australian Government and other designated authorities in order to provide specific services as required by law. These may include but are not limited to:

- j. Australian Standards Quality Authority (ASQA)
- k. State Funding Bodies
- l. National Centre for Vocational Education Research (NCVER)

The Privacy Notice and Student Declaration is a statement acknowledged by a student during their enrolment to indicate awareness that personal information collected from the student may be used together with training activity information. The privacy statement lists the ways information about the student is held, used, disclosed and managed. For more information in relation to this policy please refer to:

<https://www.education.gov.au/privacy-notice-and-student-declaration>

If there is a serious health-related issue and some information may be provided to First In Team and Safety Corp during a consultation with a practitioner, then this information may be accessed by First In Team and Safety Corp staff for the purposes of providing further helpful services to the student. No other parties will gain access to the information at any time, other than those listed above without the written consent of the individual student concerned.

## Breaches in Privacy and Confidentiality

Should First In Team and Safety Corp become aware of any breach in these Policies and Procedures, First In Team and Safety Corp must promptly consider whether such an incident breaches our obligations under the Privacy Act and the Australian Privacy Principles, and whether First In Team and Safety Corp is required to notify the Office of the Australian Information Commissioner (OAIC) and any parties who are at risk because of the breach.

## Procedures Ensuring the data quality

Consistent with the Australian Privacy Principles, First In Team and Safety Corp is committed to ensuring that personal information collected by First In Team and Safety Corp remains accurate, complete and up to date. First In Team and Safety Corp relies on its students to advise First In Team and Safety Corp of changes that may occur in personal information in order to keep all records up to date and of good quality.

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First In Team and Safety Corp will ensure that the students’ records are kept updated by making the changes in the student files, in the student management system and in the student soft copy register as soon as they are provided by the student.

First In Team and Safety Corp will destroy records relating to personal information when such information is no longer necessary to be retained within First In Team and Safety Corp’s records. Personal information will be destroyed by shredding or other secure process.

## Access to data and making corrections

All students and clients have the right to inspect their own personal information and files held by First In Team and Safety Corp.

Prospective students are informed that upon giving First In Team and Safety Corp their personal contact details, First In Team and Safety Corp will use these details to process their enquiry and send them course information. Upon reasonable request and 5 working days’ notice, First In Team and Safety Corp administrative staff will provide a student with access to their personal records and if required, reissue statements of attainment or qualifications achieved. First In Team and Safety Corp will not allow this to take place without an appointment being made.

Student’s personal records cannot be released to parents, partners or any external party without the written consent of the student.

When a record is found to be incorrect, this will be corrected; when a student requests that a record be corrected because it is not accurate or correct, the details of the request for amendment with the evidence supplied for change will be noted on the records.

## Breaches of the Privacy Act

First In Team and Safety Corp will take appropriate, prompt action if it has reasonable grounds to believe that a Breach may have, or is suspected to have occurred, by reporting all notifiable data breach matters to the Office of the Australian Information Commissioner (OAIC), individuals to whom the information relates, or taking remedial internal action, depending on the type of data breach. Not all data breaches will require OAIC notification Our Privacy Officer is responsible for managing data breach incidents.

A “Notifiable Data Breach” is a data breach that is likely to result in serious harm to any of the individuals to whom the information relates. A data breach occurs when personal information held by us is lost or subjected to unauthorised access or disclosure.

Data Breaches (suspected and actual) must be reported to our Privacy Officer who will:

- m. in conjunction with the reporter of the data breach and any other relevant staff or Licensed Partner, ensure immediate action is taken to mitigate or remove the suspected source of the Data Breach where possible
- n. have regard to the nature of the breach and the sensitivity of the personal information determine if any remedial action is appropriate to avoid serious harm occurring
- o. if remedial action is not appropriate, determine if the incident should be escalated to the Data Breach Response Team.

If remedial action is unsuccessful and the data breach will likely result in serious harm to any of the individuals to whom the information relates, the Director and Compliance Manager will manage the incident.

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