

## Privacy Protection

### Purpose

This policy ensures that Firstaidpro meets its legal and ethical requirements and complies with the Privacy Act 1988 (Commonwealth). This policy describes how Firstaidpro 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.

### Definitions

Under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012 (s6(1)), personal and sensitive information is defined as follows:

- Personal information: “information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.”
- Sensitive information: “(a) information or an opinion about an individual’s: (i) racial or ethnic origin, or (ii) political opinions, or (iii) membership of a political association, or (iv) religious beliefs or affiliations, or (v) philosophical beliefs, or (vi) membership of a professional or trade association, or (vii) membership of a trade union, or (viii) sexual preferences or practices, or (ix) criminal record, that is also personal information; or (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for the purposes of automated biometric verification or biometric identification; or (e) biometric templates”.

### Authority to collect and store information

Firstaidpro is an approved Registered Training Organisation by the Australian Skills Quality Authority. This registration is issued under the authority of the National Vocational Education and Training Regulator Act 2011 and National VET Data Policy 2017. This legislation requires Firstaidpro to collect personal and sensitive information from its students. This requirement is specified in the Data Provision Requirements 2011.

The Standards for Registered Training Organisations require Firstaidpro to retain and store this information for up to 30 years and to report training activity to

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government agencies in accordance with mandatory reporting requirements.

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.

## Collection methods

In the course of its business Firstaidpro will collect information from students and clients either electronically or in hard copy format, including information that personally identified individual people. Firstaidpro will record various communications between the RTO and student and clients associated. Firstaidpro will only collect personal information by fair and lawful means that is necessary for the functions of the RTO.

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 Student Management System. Hard copy records are also retained within our student files.

## Direct marketing

Firstaidpro respects an individual's right not to receive marketing material, and provides an option within communications to **unsubscribe from receiving marketing material**. Firstaidpro 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, Firstaidpro's practice to 'cold call' for the purpose of marketing its products and services.

## Sensitive information

Personal information collected by Firstaidpro 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.

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- ‘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 Firstaidpro employees for HR management purposes.

### **Disclosure of personal information**

Firstaidpro 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.

Firstaidpro may share personal information with the Commonwealth government in accordance with Commonwealth contractual obligations. In these circumstances Firstaidpro 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.

### **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 in RTO Data and email contact lists.
- Names and contact details collected during the delivery of services may be held either in electronic form in Firstaidpro document management system or in paper documents which are locked in cupboards and filing cabinets.
- Personal staff information is held in our Student Management System and HR management, pay roll database.
- Backup copies of all electronic files held in Firstaidpro systems are kept in the event of system failure/loss. All backup copies of system files are secured.

Firstaidpro retains personal information for up to 30 years. When personal information is no longer necessary for Firstaidpro business functions, and it is lawful to do so, Firstaidpro destroys the information.

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## Information security

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

- Firstaidpro 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 Firstaidpro.
- Access to our Student Management System is protected through user log-on and password, and assignment of user access rights.
- Firstaidpro premises and data storage systems are fully secured. Firstaidpro 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.

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