

# Privacy Policy

## PURPOSE:

This policy describes the practices and procedures by which Golden wattle group T/A Meridian Vocational College (MVC) shall ensure compliance with the relevant privacy legislation to protect personal information and right to privacy of those which are detailed within this policy.

## SCOPE:

This policy applies to all students, both Domestic & International, and persons employed by or contracted to MVC. The CEO is responsible for the control and issuance of this policy.

## PROCEDURE

MVC shall ensure that it respects the privacy of staff, prospective staff, students, prospective students and employers by implementing the Australian Privacy Principles.

The Australian Privacy Principles (APPs) set out how private sector organisations should collect, use, keep secure and disclose personal information. The principles give individuals a right to know the information an organisation holds about them and a right to correct that information if it is wrong.

MVC shall ensure it operates consistently with the APPs and only collects the personal information that is necessary for the conduct of its business, and that it will use that information in the manner for which it was intended.

MVC lawfully collects personal information that is necessary for our business to function. The information we collect, and hold will depend upon the products and services requested and may include but not be limited to:

- Your name
- Date of birth
- Address
- Contact details

Golden Wattle Group Pty Ltd T/A Meridian Vocational College uses the information collected for the purpose disclosed at the time of collection or otherwise as set out in this Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent, unless authorised or required by law. Golden Wattle Group Pty Ltd T/A Meridian Vocational College will only use and disclose your personal information:

- To establish and maintain your relationship as a customer of Golden Wattle Group Pty Ltd T/A Meridian Vocational College
- To provide the products and services you have requested from Golden Wattle Group Pty Ltd T/A Meridian Vocational College
- To administer and manage those products and services

Golden Wattle Group Pty Ltd T/A Meridian Vocational College will have on display the following policy statement for Students/candidates in their written agreement.

## **PRIVACY NOTICE**

Under the Data Provision Requirements 2012, MVC is required to collect personal information about you and to disclose that personal information to the National Centre for Vocational Education Research Ltd (NCVER).

Your personal information (including the personal information contained on this enrolment form and your training activity data) may be used or disclosed by MVC or statistical, regulatory and research purposes. MVC may disclose your personal information for these purposes to third parties, including:

- School – if you are a secondary student undertaking VET, including a school-based apprenticeship or traineeship;
- Employer – if you are enrolled in training paid by your employer;
- Commonwealth and State or Territory government departments and authorised agencies;
- NCVER;
- Organisations conducting student surveys; and
- Researchers.

Personal information disclosed to NCVER may be used or disclosed for the following purposes:

- Issuing a VET Statement of Attainment or VET Qualification, and populating Authenticated VET Transcripts;
- facilitating statistics and research relating to education, including surveys;
- understanding how the VET market operates, for policy, workforce planning and consumer information; and
- administering VET, including program administration, regulation, monitoring and evaluation.

You may receive an NCVER student survey which may be administered by an NCVER employee, agent or third-party contractor. You may opt out of the 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 VET Data Policy and all NCVER policies and protocols (including those published on NCVER's website at [www.ncver.edu.au](http://www.ncver.edu.au)).

Access to client/candidate personal information is available on application through the Administration of Golden Wattle Group Pty Ltd T/A Meridian Vocational College. Access to personal information will always be controlled. Access to personal information must be requested by submitting and having approved, an **Access Authorisation Form**.

A person requesting the information will be accompanied for the entire time they are in possession of their personal information by the CEO of Golden Wattle Group Pty Ltd T/A Meridian Vocational College.

<b>Clients Obtaining Access to Own Records</b>		
Client's have access to their own records through their person login into the Student Management System (SMS).		
<b>STEP 1 – Application to access own records – Paper-based/ documentation</b>		
<b>No.</b>	<b>Who</b>	<b>Actions</b>
1.1	<b>Client</b>	a) Client advises in writing they wish to view their own records "Paper-based" (i.e. student/staff file) kept by Golden Wattle Group Pty Ltd T/A Meridian Vocational College.

STEP 2 – Accessing own records		
No.	Who	Actions
1.2	<b>Admin</b>	<ul style="list-style-type: none"> <li>a) Communicate with client confirming their needs.</li> <li>b) Confirm identify of the client.</li> <li>c) Arrange a date / time for the client to attend and view their records.</li> </ul>
2.1	<b>Client</b>	<ul style="list-style-type: none"> <li>a) Client arrives to view their own “Client file”.</li> </ul>
2.2	<b>Admin</b>	<ul style="list-style-type: none"> <li>a) Verify identification of client.</li> <li>b) Retrieve client file.</li> <li>c) Provide private access for client to view their own records under supervision.</li> </ul>
2.3	<b>Client</b>	<ul style="list-style-type: none"> <li>a) Client views their own “Client file”.</li> <li>b) Client is not permitted to remove any documentation from their own file, however, may request a copy of the documentation.</li> </ul>
2.4	<b>Admin</b>	<ul style="list-style-type: none"> <li>a) Return client file to filing system.</li> </ul>

Privacy Procedures		
Client Allowing Access of their Records to a third party		
Clients have access to their own records through their person login into the Student Management System (SMS).		
STEP 1 – Application by a client for a third party to access client records / information		
No.	Who	Actions
1.1	Client	a) Client completes “ <b>Privacy Disclosure Form</b> ” and submits to admin, allowing a third party to access the client’s own records/ information.
1.2	Admin	a) Communicate with client confirming their needs. b) Confirm identity of the client. c) Confirm identity of the third party. d) Arrange a date / time for the third party to attend and view the records or discuss personal details of the client. e) May need to communicate with Third party to arrange date and time. f) Note on the client records, both SMS and Client file, that a third party has authority to view records. g) Place “ <b>Privacy Disclosure Form</b> ” on client file.
STEP 2 – Accessing Client records by a Third party		
No.	Who	Actions
2.1	Third party	a) Third party arrives to view the Client records “Client file” or calls to receive client specific information.
2.2	Admin	a) Verify identification of Third party. b) Retrieve client file. c) Provide private access for Third party to view the records under supervision or provide personal information as permitted and written on the “ <b>Privacy Disclosure Form</b> ”.
2.3	Third party	a) Third party views the “Client file”. b) Third party is not permitted to remove any documentation from the client file, however, may request a copy of the documentation if this has been the instruction given by the client on the “ <b>Privacy Disclosure Form</b> ”.
2.4	Admin	a) Returns client file to filing system.

## Review

The CEO will review the policy annually or earlier if required. Should there be relevant amendments to the respective Act or changes to the operations of MVC or educational environment, these changes will be analysed and updated in the policy.

## Purpose for Collecting Information

The purpose for which MVC collects personal information of students includes satisfying legal obligations, administration, to keep employers informed of the student's progress during study, allow MVC to discharge its duty of care.

The purpose for which MVC collects personal information of job applicants, staff members and contractors include satisfying ASQA registration requirements, satisfying legal obligations, insurance purposes, administering an individual's contract of employment.

## Information Collected

MVC respects the importance of securing any form of personal information which is collected from the student(s) and/or other Stakeholders. Information collected from students is only utilised for the purpose gathering information on the student as part of their enrolment, training, assessment and certification process. All data is kept securely within either a locked filing cabinet or filed electronically within a password protected database. All personal documents, training records are destroyed using a secured shredding service (times may vary according to data retention requirements conditions of training regulator)

## Provision of Information

Student or staff information will not be provided to anyone unless MVC has permission from the student or staff MVC has an obligation under Commonwealth and State legislation to provide information to certain government departments for the purpose of reporting data to the government. On occasion, the government regulatory body will require access to student records for the purpose of auditing the RTO against the Standards for RTO's and National Code The RTO promotes and conducts the following policy in accordance with the privacy Amendment (enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988.

## Access to Information

Under the Australian Privacy Principles (APPs) the student or staff member can access his/her personal information and may correct inaccurate or outdated information about them.

Personal details may be updated by completing **Access Authorisation Form** (document # 934) by contacting the MVC administration Officer: 0432 421 482 or [info@mvc.edu.au](mailto:info@mvc.edu.au)

Should staff or students seek access to their information we have a documented procedure requiring authorisation before this can occur.

- Access to client/candidate personal information is available on application through the MVC administration Officer. Access to personal information will always be controlled.
- Access to personal information must be requested by submitting and having approved, an **Access Authorisation Form**. **Proof of identity** will be required before access is granted.
- Clients/Students/Staff requesting the information will be accompanied for the entire time they are in possession of their personal information by the MVC administration Officer.

Students will have access to all information held about them. MVC will store and use the information appropriately and limit access to only those who have a legal reason to have access to that information, or to whom the student has given permission.

Students who request access to their information will be given full access to the details they request. No cost will be charged for them accessing their information whilst they are enrolled students.

### **Staff**

Staff will have access to all information we hold on them, and we will store and use the information appropriately and limit access to only those who have a legal reason to have access to that information, or whom the staff member has given permission.

Staff member who request access to their information will be given full access to the details they request. No cost will be charged for them accessing their information whilst they are employed at MVC. If the person is no longer an employee of MVC, and they request access of information there may be a fee involved, the cost must be paid in advance.

### **Why and how MVC collects, uses or discloses personal information**

Under MVC's Written agreement, enrolling students are provided with details of the range of purposes for which MVC can use or disclose (to a third party) a student's personal information e.g. statistical purposes, surveys, ASQA Audits, further study opportunities, alumni information and newsletters related to MVC events.

In acknowledging and accepting the Terms and Conditions of Enrolment, the individual is taken to have given an implied consent to the use or disclosure of personal information for the listed purposes.

### **Online data**

The MVC website records each visit by a site user ("user") and logs the following information for statistical purposes - the user's IP address, the date and time of the visit to the site, the pages accessed and documents downloaded, the previous website visited and the type of browser used. This information is analysed at the end of each month to determine the site's usage statistics. The website is maintained overseas by a third party.

No attempt is made to identify individual users or their browsing activities.

MVC also records the name, mobile and email address of people who make general enquiries about MVC courses, registration or course fees through the 'Register your interest' form on the website. This information is used to enable MVC to appropriately respond to the enquirer. This information is securely stored by MVC.

Some MVC web pages use "cookies", which are small files used for record-keeping purposes. A cookie helps MVC remember a user. Cookies can make subsequent visits to the web page simpler and more seamless. Users can set their browser to notify when receipt of a cookie, which gives the user the chance to decide whether or not to accept it. (However, by not accepting cookies, some web pages may not display properly, or certain information may not be permitted).

The cookies on MVC website do not store personal details such as a user's name, address, telephone number or payment information, but may include the IP address, referring site and pages visited on MVC website. IP addresses are logged to track a user's visit while the



user remains anonymous. MVC analyses this data for certain trends and statistics, such as which parts of the MVC website users are visiting and for how long. MVC does not link an IP address to anything that may identify a user.

MVC uses Google Analytics to analyse the use of MVC website. The analytics platform gathers information about website use by means of cookies which collect anonymous data. The information gathered relating to the MVC website is used to create reports about the use of the website.

MVC also uses advertising cookies and technologies including Facebook and Google for the purposes of analytics and online behavioural advertising. This enables MVC to direct advertising content that is more relevant to a user's interests. Privacy policies for [Facebook](#) and [Google](#) are also available online.

Anonymous data from advertising cookies, including browsing history and practices, may be provided to third parties for the purposes of promoting MVC via online advertising.

For more information about online targeting and advertising cookies, as well as instructions on how to opt out, visit one of the following online advertising regulatory groups:

- [Australian Digital Advertising Alliance \(ADAA\)](#)
- [Digital Advertising Alliance \(DAA\)](#)
- [European Digital Advertising Alliance \(EDAA\)](#)
- [Network Advertising Initiative \(NAI\)](#)

Under MVC's Terms and Conditions of Enrolment, enrolling students acknowledge and accept that MVC may use a person's personal contact information (or disclose this information to a Third Party to act on MVC's behalf) seeking participation in MVC, Governmental or National Centre for Vocational Education Research (NCVER) student surveys, or in relation to further study opportunities, alumni information and/or newsletters related to MVC events, unless the enrolling student withdraws such agreement and acceptance.

If MVC uses personal information it will take reasonable steps to ensure that, having regard to the purpose for which the information is being used, the information is accurate, complete and up to date.

### **Storage, security and retention**

MVC will securely store all personal information held by it, whether in hard copy record or within an electronic information store e.g. a system or database, to mitigate against loss, misuse or unauthorised access or disclosure.

Users of the MVC website should note that there are inherent risks associated with the transmission of information via the Internet. Every user should make their own assessment of the potential risks to the security of their personal information when making a decision as to whether or not to utilise this site. There are alternative ways to obtaining information from, and transacting business with MVC for those users who do not wish to use the Internet.

MVC will take such steps as are, in the circumstances, reasonable to ensure that personal information in its possession or under its control is securely stored and is not misused. MVC takes a risk-based approach to determine appropriate security levels.

It should be noted that the MVC website contains "Useful links" to a large number of other web sites that are included on the basis of containing content related to the South

Australian community, business or government. When a user has clicked on a link to another website, they leave this site and this privacy and security statement does not apply to those websites.

The content of the MVC Privacy Statement may be updated from time to time, so users are encouraged to regularly check the Privacy Statement and carefully read the information provided.

## **Rights**

Under the IPPs, a person for whom personal information is held by MVC can request that information be accessed, updated or if appropriate, corrected.

Requests for personal information to be accessed, updated or corrected or complaints about the manner in which MVC has dealt with an individual's personal information should be directed to the MVC Administration Officer via: [info@mvc.edu.au](mailto:info@mvc.edu.au) If MVC is unable to assist, or if a person is dissatisfied with the way a complaint has been dealt with by MVC, the person may also lodge a complaint with relevant South Australian complaint agency or <https://www.ombudsman.gov.au/>



## Privacy Principles

MVC abides by the Australian Privacy Principles (APP) and will not pass on students or other staff member's information to anyone in any way that may be considered as breaching the Privacy Principles.

The following Australian Privacy Principles (APPs) were downloaded from:

<https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/>

### **APP 1 — Open and transparent management of personal information**

Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

### **APP 2 — Anonymity and pseudonymity**

Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

### **APP 3 — Collection of solicited personal information**

Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

### **APP 4 — Dealing with unsolicited personal information**

Outlines how APP entities must deal with unsolicited personal information.

### **APP 5 — Notification of the collection of personal information**

Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

### **APP 6 — Use or disclosure of personal information**

Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

### **APP 7 — Direct marketing**

An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

### **APP 8 — Cross-border disclosure of personal information**

Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

### **APP 9 — Adoption, use or disclosure of government related identifiers**

Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier or use or disclose a government related identifier of an individual.

### **APP 10 — Quality of personal information**

An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

### **APP 11 — Security of personal information**

An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

### **APP 12 — Access to personal information**

Outlines an APP entity's obligations when an individual request to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

### **APP 13 — Correction of personal information**

Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.