

QUEENSLAND GOVERNMENT SUBSIDISED TRAINING

Privacy Policy

Introduction

This Privacy Policy relates to the collection, storage, handling, accessing, amendment, management, transfer, use or disclosure of personal information.

Personal information is defined in the *Information Privacy Act 2009* (Qld) as “Information or an opinion including information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonable be ascertained, from the information or opinion.”

Information Privacy Principles

The *Information Privacy Act 2009* (Qld) requires that personal information be treated in a way that is compliant with 11 Information Privacy Principles (IPPs). The following sections outline how Group 314 complies with these 11 IPPs.

IPP 1 – Collection of personal information (lawful and fair)

Personal information is collected from students as required for Group 314 to properly carry out its' Pre-Qualified Supplier obligations for the delivery of training under the Agreement. Group 314 only collects personal information for purposes that are fair, lawful and reasonably necessary for, or directly related to, its' obligations under the Agreement.

IPP 2 – Collection of personal information (requested from individual)

Personal information collected from students will be used for purposes including, but not limited to: determining eligibility for training; enrolment in training courses; obtaining feedback on training courses; and responding to a complaint or an appeal.

The Australian Skills Quality Authority (ASQA) collects statistical data for all nationally recognised vocational training. Much of the personal information collected by Group 314 is associated with these requirements and will be provided to ASQA as required.

Personal information for students enrolled onto programs subsidised by the Queensland Government Department of Employment, Small Business and Training (the Department) may be provided to the Department as required for purposes directly related to the subsidised training undertaken such as reporting.

ASQA requires Group 314 to verify the authenticity of any certification documentation provided by students to support a claim for recognition of prior learning or credit transfer. A copy of certificates will be provided to the issuer, or if the issuer is no longer operating, to ASQA for verification.

IPP 3 – Collection of personal information (relevance etc)

Group 314 takes all reasonable steps to ensure personal information collected from students is relevant to the purpose for which it is collected, complete and up to date. This is managed via systems and processes that: define the information requirements of ASQA and Queensland State Government for the delivery of Queensland Government Subsidised Training; and require systematic checks of personal information on receipt.

IPP 4 – Storage and security of personal information

All personal information collected by Group 314 is stored in the Group 314 Student and Learning Management System, and/or the Group 314 Information Management and Storage System. Personal Information is not stored in any other system or location.

Access to personal information in the Group 314 Student and Learning Management System and/or the Group 314 Information Management and Storage System is password protected and is controlled by the Group 314 Chief Executive. Access is restricted to selected Group 314 personnel and the external third party Compliance Manager who require the information to perform their functions.

All Group 314 or third party personnel with access to personal information collected under the Agreement must sign a Deed of Privacy declaring that they will not lose, allow unauthorised access, use, modify, disclose (unless in accordance with the *Information Privacy Act 2009* (Qld)) or otherwise misuse personal information, and that they will act in accordance with this Policy.

When no longer required, personal information will be deleted or destroyed in a secure manner.

IPP 5 – Providing information about documents containing personal information

This Policy discloses that Group 314 collects personal information from students, describes the type of personal information it has, and the main purpose that the personal information is used for.

If a student wants access to their own personal information, a written request must be sent to the Group 314 Chief Executive at 2 Lamber St Tolland, NSW, 2650 or info@group314.com.

IPP 6 - Access to documents containing personal information

If a student has provided a written request to the Group 314 Chief Executive for access to their own personal information, access will be provided as soon as practicable unless Group 314 is authorised to refuse access to the information under the *Freedom of Information Act 1982* or any other applicable legislative provisions.

IPP 7 – Amendment of documents containing personal information

Group 314 takes all reasonable steps to make sure personal information is accurate. These steps include: Checking information for accuracy and currency when it is received; maintaining and updating personal information when advised by students that their personal information has changed; and checking and updating personal information at other times as necessary to ensure it is relevant to the purpose it was collected for, complete, up to date and not misleading.

If Group 314 does not believe it is required to amend personal information following a request from a student to change their personal information, the request from the student is attached to the personal information in question.

IPP 8 – Checking of accuracy etc. of personal information before use

As for IPP 7.

IPP 9 – Use of personal information only for relevant purpose

Group 314 only uses personal information when it is directly relevant to the delivery of Queensland Government subsidised training services under the Agreement.

IPP 10 - Limits on use of personal information

Group 314 does not use personal information collected for use in the delivery of Queensland Government subsidised training services under the Agreement for another purpose unless:

- The student has agreed to the use of the information for another purpose, or the use of the information is necessary to lessen or prevent a serious threat to the life, health, safety or welfare of the student, or to public health, safety or welfare.
- It is required under a law.
- It is required for use by a law enforcement agency for reasons listed in Schedule 3 of the *Information Privacy Act 2009* (Qld).
- The other purpose is directly related to the purpose for which the information was obtained.

IPP 11 – Limits of Disclosure

Group 314 does not disclose personal information to an entity other than the student who is the subject of the personal information unless:

- The student is reasonably likely to have been aware, or was made aware under IPP 2, that it is Group 314's usual practice to disclose that type of personal information to the relevant entity.
- The student has agreed to the disclosure.
- The disclosure is necessary to lessen or prevent a serious threat to the life, health, safety or welfare of the student, or to public health, safety or welfare.
- The disclosure is authorised or required under a law.
- The disclosure is required for or by a law enforcement agency for reasons listed in Schedule 3 of the *Information Privacy Act 2009* (Qld) and a note of disclosure is added to the personal information.
- An authorised officer of ASIO asked for the personal information within the bounds of Schedule 3 of the *Information Privacy Act 2009* (Qld) and a note of disclosure is added to the personal information.

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- The disclosure is necessary for research or the compilation or analysis of statistics, in the public interest and all the following apply:
 - The disclosure does not involve the publication of all or any of the personal information in a form that identifies the student;
 - It is not practicable to obtain the agreement of the student before the disclosure; and Group 314 is satisfied on reasonable grounds that the relevant entity will not disclose the personal information to another entity.

If Group 314 does disclose any personal information in accordance with IPP 11, the relevant entity (except for ASQA and the Department) is required to sign a Deed of Privacy declaring that they will not use or disclose the information for a purpose other than the purpose for which the information was disclosed (unless in accordance with the *Information Privacy Act 2009* (Qld)) or otherwise misuse personal information.

Transfer of personal information outside Australia

Group 314 will not transfer a student's personal information to an entity outside Australia unless:

- The student agrees to the transfer.
- The transfer is required by a law.
- The transfer is necessary to lessen or prevent a serious threat to the life, health, safety or welfare of the student, or to public health, safety or welfare.
- Two or more of the following apply:
 - The recipient of the personal information is subject to a law, binding scheme or contract that required fair handling of personal information that is similar to the IPPs.
 - The transfer is necessary for the performance of Group 314's functions in relation to the student.
 - The transfer is for the benefit of the student, but it is not practicable to seek the student's agreement, and if it were practicable that the student would be likely to give the agreement.
 - Group 314 has taken reasonable steps to ensure that the personal information transferred will not be held, used or disclosed by the recipient of the information in a way that is inconsistent with the IPPs.