

# Privacy

## Version Information

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<b>Policy Author / Editor</b>	Anna Alfirenko		<b>Policy Approver</b>	Paul Goudie	
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## Purpose

Goodstart Institute of Early Learning provides training and assessment services for nationally accredited vocational education and training programs. Goodstart Institute of Early Learning is committed to safeguarding students privacy. The Privacy Act 1998 (Cth) (Privacy Act), Australia Privacy Principles and any relevant registered privacy codes govern the way we manage personal information. This policy demonstrates how Goodstart Institute of Early Learning collects, uses and discloses the personal information we collect from students.

## Scope

Goodstart Institute of Early Learning will only collect personal information with the individual's consent and only the quantity as is required to administer nationally recognised training, student identification and legal matters, we are committed to protecting the privacy of staff and students personal information, including the 13 Australian Privacy Principles (APPs) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

## Legislation

This Policy is in accordance with:

- The Higher Education Support Act 2003 (HESA)
- Amended 2014; Privacy Act 1988
- Privacy Amendment (Enhancing Privacy protections) Act 2012
- Information Privacy Act (per state)
- The Education and Training Reform Act 2006
- National VET Provider Collection Data Requirements Policy (2017)
- Standards for Registered Training Organisations (RTOs) 2015.

The Education and Training Reform Act 2006 requires Goodstart Institute of Early Learning to collect and disclose a student's personal information for a number of purposes including the allocation to a student of a Victorian Student Number and updating a student's personal information on the Victorian Student Register.

# Privacy

Throughout the process of managing student personal information we are required to comply with a number of government legislations/policies. These include:

- Requirements under clause 23 Schedule 1A of HESA
- The Australian Privacy Principles set out in the Privacy Act (Amended 2014)
- Freedom of Information Act 1982 (VIC).

Australian Privacy Principles establish minimum standards for the private sector in relation to the collection, handling, use, disclosure, management, access, correction and disposal of 'personal information' about natural persons. In summary, 'personal information' is information or an opinion relating to an individual which can be used to identify that individual, for example:

Australian Privacy Principle	Action to be implemented	Corresponding policy
1. Open and transparent management of personal information	Implement relevant policies and make them available and for free to students.	Privacy Policy Complaints and appeals Policy
2. Anonymity and pseudonymity	Ensure students are informed of how we collect and protect information	Student privacy note and declaration on how and what we collect on enrolment form  Privacy policy
3. Collection of personal and sensitive information		
5. Notification of collection		
4. Dealing with unsolicited personal information	Ensuring we do not obtain any information that is un-necessary for student enrolments  Unsolicited personal information can be; Misdirected mail; emails accidentally copied to you; receiving more information from clients than you asked for (e.g. detailed financials).	All policies in relation to data collection (privacy policy), student enrolment (enrolment policy)
5. Use or disclosure	Understanding why we use and disclose training data and personal information	Privacy Policy
7. Direct marketing	Ensure staff are aware of the use of information and how they can opt out of marketing	Privacy Policy
8. Cross border disclosure	Does not apply to Goodstart	N/A
9. Adoption, use or disclosure of government related identifiers	USI collection	Enrolment policy
10. Quality	Ensuring all information we collect is up to date and secure	Privacy policy
11. Security		Enrolment form
12. Access	Accessing information and correcting any errors	Privacy policy
13. Correction		Student handbook

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## VET Data Use Statement

The VET (Vocational and Education Training) Data Use Statement is a statement acknowledged by a person submitting data on behalf of a RTO who provides VET Data to organisations.

By acknowledging the VET Data Use Statement and RTO Declaration Goodstart Institute of Early Learning is aware that information submitted is complete and accurate and may be used for the purposes such as facilitating statistics and research relating to education, including surveys.

Goodstart Institute of Early Learning National Manager and/ or Student Services Manager will ensure the VET Data Use Statement is signed as part of the national Data Policy requirements.

## Privacy Statement and Student Declaration

Under the Data Provision Requirements (2012) RTOs are required to collect personal information about students and disclose that information to the National Centre for Vocational Education Research (NCVER).

The Privacy Statement and Student Declaration is a statement acknowledged by all students to indicate awareness that personal information collected from the student may be used along with their training activity information. The privacy statement lists the way information about the student is held, used, disclosed and managed.

Each student undertaking studies with Goodstart Institute of Early Learning is required to complete the student declaration and consent form as part of their enrolment process.

## Collection of Personal Information

### Purpose

Goodstart Institute of Early Learning collects and holds personal information about students (that is, information relating to an individual or which can be used to identify an individual), that is reasonably necessary for, or related to, our activities and the services we provide and for the purposes of delivering training and assessment services in accordance with the requirements for Registered Training Organisations (RTO). Goodstart Institute of Early Learning will only use personal information for the purpose it was collected or a reasonably expected or related secondary purpose.

### Kinds of Information Collected

Kinds of personal information Goodstart Institute of Early Learning collects and holds may include; name, gender, address, phone numbers, email address, date of birth and place of birth, employment details, Aboriginal and/or Torres Strait Islander status, passport number, copies of your photo identification (such as copies of your driver's licence, passport, or any other government issued identification), previous study details, academic transcripts, Unique Student Identifier (USI) physical or mental illness or disabilities, language, literacy and numeracy (LLN) level, Centrelink Customer Reference Number (CRN), and credit card details and/or other information relevant to providing students with training and assessment services.

### Method of Collection

Personal information will generally be collected directly through the use of forms, over the internet via our website, via email or written communication with students, or through telephone conversations.

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There may on occasion be instances where personal information that will be collected indirectly because it is unreasonable or impractical to collect the personal information directly. We will notify the relevant person about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

## Failure to Provide Information

If a student does not wish for their personal information to be collected the student should discuss this with a Student Services team member. Student Services will act strictly in accordance with this policy and will discuss the reasons for collecting personal information. They will also discuss any consequences of not providing personal information, or providing incomplete or inaccurate personal information, which may include an effect on what services The Institute can provide to the students.

## Use of Personal Information

Goodstart Institute of Early Learning ensures adherence to the privacy and use of student's personal information. Goodstart Institute of Early Learning will collect, hold, and use personal information for purposes associated with:

- Providing training and assessment services
- Assessing eligibility of traineeships or apprenticeships
- Relevant State and Federal Government reporting of students and their academic progress were required under law
- Providing students with information about our organisation, and activities via letters, email, SMS, telephone and other organisation communication channels
- Access to VET Transcripts that show Nationally Recognised Training undertaken since 2015 through links with the USI
- Sharing name and training details with third party arrangements in the setup of assessment services
- Requesting information from each student about our organisation via surveys.

## Use and disclosure of personal information

Goodstart Institute of Early Learning will make every effort to ensure that student personal information remains confidential and secure and is only used for the primary purposes outlined in this document and only for any secondary purposes that students have been made aware of and have agreed to.

Personal information will only be used and disclosed through:

- Establishing and maintain the students relationship
- Providing the products and services the student has requested
- Administering and managing those products and services
- Sharing with the Australian Government or relevant State Government(s) and designated authorities; including the Australian Skills Quality Authority (ASQA). This information includes personal contact details, course enrolment details
- The enforcement of criminal law or of a law imposing a financial penalty, or for the protection of public revenue, if required

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- Informing students of new products, special events or promotions
- Providing Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) data to the governing regulators and to the National Centre for Vocational Education Research (NCVER)
- Complying with Federal or State based legislation for our scope of operation or Commonwealth contractual obligations
- If a permitted health condition exists or a health condition eventuates that may require emergency medical care for any student.

If students chooses to no longer receive promotional email or text message information, they should advise Goodstart Institute of Early Learning by email or telephone.

## Sensitive Information

In some circumstances Goodstart Institute of Early Learning may seek to collect personal information that is sensitive. This may include information such as any physical or mental illnesses or disabilities students may have, including language, literacy and numeracy (LLN) level. We collect this information as it is reasonably necessary to enable The Institute to provide training and assessment services to cater for individual needs and requirements.

For example, you may have difficulty reading and/or writing and Goodstart Institute of Early Learning may need to provide additional assistance or tailored assessment methods to suit your needs.

Goodstart Institute of Early Learning will only collect your sensitive information with your consent and will ensure that it is stored securely. If you do not wish for your sensitive information to be collected by The Institute, you should discuss this with a member of The Institute's Student Services team.

The Student Services team member will act strictly in accordance with this policy and will discuss the reasons for seeking to collect the sensitive information for each individual student. Student Services will discuss any consequences of students not providing sensitive information which may include an effect on the services The Institute can provide to you.

## Access and Correction

Students are able to request access to their personal information. All requests for access to personal information will be done in accordance with the Australian Privacy principles. If for some reason Goodstart Institute of Early Learning refuses to give access to such personal information, we will provide the person concerned with reasons for our refusal in accordance with the Privacy Act.

If at any time you believe Goodstart Institute of Early Learning's record of your personal information is incorrect, please let Goodstart Institute of Early Learning know. We will take reasonable steps to correct the information so that it is accurate, complete and up-to-date.

Should staff, students or clients seek access to their information, we will:

- Not sell, share, rent or otherwise provide personal information to others, including people in a student's workplace, their spouses or parents, without their written consent

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- Provide access to personal information by written application through the Goodstart Institute of Early Learning Student Services Manager by emailing [goodstart@goodstart.edu.au](mailto:goodstart@goodstart.edu.au)
- Ensure access to personal information will be controlled at all times. Students may access their own personal information held at no charge
- Help individuals to access or obtain a copy of their personal information within 5 days of receiving the written request

Alternatively, The Freedom of Information Act 1982 (VIC) allows any person to make an application for access to information (including personal information) held by Goodstart Institute of Early Learning to be amended if the person believes that the information is incomplete, incorrect, out of date or misleading.

## Internet

If you access our website, we may collect additional personal information about you in the form of your IP address or domain name. Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and any linked websites are not subject to our privacy policies and procedures.

## Amendments to this Privacy Statement

Goodstart Institute of Early Learning may change this Privacy Statement at any time without prior notice. When we do so, we will notify you of the changes by posting an updated version of the policy on our website. This notice is provided for your information and is not intended to limit or exclude your rights under the Privacy Act 1998 (Cth).

## Complaints and Feedback

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, please contact us as set out below and we will take reasonable steps to investigate the complaint and respond to you. If you are not happy with our response, you may complain directly to the Australian Information Commissioner.

If you have any queries or concerns about your privacy policy or the way we handle your personal information, please contact Student Services at:

Postal Address: Goodstart Institute of Early Learning,  
Attention: Student Services, PO Box 12089 George Street, Brisbane, Qld, 4003  
Email Address: [goodstart@goodstart.edu.au](mailto:goodstart@goodstart.edu.au)  
Telephone: +61 1800 617 455

## More Information

For more information about privacy in general, you can visit the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au)