

PRIVACY & CONFIDENTIALITY POLICY

Purpose:

This policy & procedure supports Quality Service Skills to meet relevant legislative and contractual requirements including:

- The VET Quality Framework (ASQA Standards for Registered Training Organizations 2015)
- Relevant State Training Authorities for Government Funding (if applicable)
- National VET Data Policy 2020
- Australian Privacy Principles
- Privacy Act 1988 (Cth)

Scope:

All management, staff, future and current students of Quality Service Skills.

Policy:

OLIMOR Training Pty Ltd (trading as Quality Service Skills) is classified as a 'small business' for the purpose of the Privacy Act 1988 (Cth) and the Australian Privacy Principles contained with Schedule 1 of the Privacy Act. <https://www.oaic.gov.au/agencies-and-organisations/faqs-for-agencies-orgs/businesses/small-business>

As such, the requirements of the Australian Privacy Principles do not apply. However, this policy describes how Quality Service Skills collects, manages, uses, discloses, protects, and disposes of personal information in *accordance* with the requirements of the thirteen Australian Privacy Principles in the interest of best practice.

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

Collection, use and disclosure of personal information

Authority

Quality Service Skills operates within the Standards for RTO's 2015 and therefore is required to record and report AVETMISS data for all learners under the National VET Provider Collection Data Requirements Policy.

Under the authority of ministers responsible for education and training, and the registration requirements legislated for training providers under national VET regulation, Quality Service Skills collects, manages, analyses, evaluates and communicates research and statistics about VET.

As of January 1st, 2019, there is no longer a requirement for student to complete a 'consent and declaration' after reading the VET Provider Policy 'Statement'. This statement was updated on the 1st January 2021 however it still does not require a signature.

Collection and use

Quality Service Skills collects personal information, either directly or indirectly, that is reasonably necessary for, or directly related to its functions and activities. Some of the information collected may be regarded as 'sensitive' as defined by the Privacy Act. In broad terms, the kinds of personal information and purposes for which it is collected are:

Solicited information:

- Contact information such as name, organisation, position, address, telephone, and email are collected for marketing, help-desk services (where needed), servicing data requests, managing funding grants, and for communicating with stakeholders and suppliers as part of day to day business.
- Names, addresses, phone numbers, emergency contact details and other employment related information is collected from employees for the purpose of managing human resources. The management of staff personal information complies with this policy.

Collection methods:

- *National VET data collections* - including the VET provider and financial collections and the apprentice and trainee collection. The data elements collected are prescribed by the AVETMISS Standard. The information is collected directly by registered training providers and apprenticeship centres and is then submitted to Quality Service Skills for managing, analysing, evaluating, and reporting.
- *National VET surveys* - Including the Learner Outcomes Survey, the Survey of Employer Use and Views of the VET System. Data is collected via questionnaire endorsed by Quality Service Skills' stakeholders.
- *Data requests* - Personal contact information is collected directly from individuals who make data requests either by telephone or email.
- *Marketing* - Personal information is collected directly from individuals via enrolment forms for marketing material; and from stakeholders for day-to-day business and information dissemination.
- *Quality Service Skills staff* - Personal information is collected from individuals on employment commencement.

Sensitive information:

- Personal information collected by Quality Service Skills 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.
 - 'Health and work injury information' is collected from Quality Service Skills employees for HR management purposes.

Direct marketing

Quality Service Skills respects an individual's right not to receive marketing material and provides an option within communications and on its website for individuals to unsubscribe from receiving marketing material. Quality Service Skills conducts its marketing communications and dissemination of research and statistics in accordance with Australian Privacy Principle 7 (Direct marketing), and the Spam Act 2003 (in respect of electronic communications such as Mail Chimp). It is not, however, Quality Service Skills practice to 'cold call' for the purpose of marketing its products and services.

Google, clickstream data and cookies

- Google Analytics is a service provided by Google which transmits website traffic data to Google Servers in the United States. Google Analytics do not identify users or associated IP addresses with any other data held by Google. We use reports from Google Analytics to help us understand website traffic and webpage usage.
- Cookies are small text files that websites place on the computers and mobile devices of people who visit those websites. This includes our website www.qss.edu.au
- Cookies are then read by the website each time a user returns to the site. These text files allow a website to remember their device and how they interacted with the website, which is useful for several different purposes. For example, cookies can be used to remember usernames and passwords, so the user doesn't have to login to certain websites every time. Cookies do not access information stored on user's computer or any personal information such as name, phone number or email address.
- Our website may contain links to other websites. Please be aware we are not responsible for the privacy practices of such websites, and we therefore recommend users read and be aware of their privacy policy.
- More information on Google's privacy policy can be found at: <https://www.google.com.au/intl/en/policies/privacy/>. It is possible to disable cookies by adjusting web-browser setting and to opt-out of Google (<https://tools.google.com/dlpage/gaoptout>). Doing so, however, may affect web-site functionality.
- The web servers for the AVETMISS Validation Software, research websites automatically log information such as server address, date and time of visit and web pages accessed. No personal information is recorded. These logs are used for website management and improvement.

Unsolicited personal information:

If Quality Service Skills should receive unsolicited personal information, it will be treated and managed according to the Australian Privacy Principles if found to be related to one of its collections, otherwise it will be destroyed or de-identified if lawful to do so.

Notification of collection

Quality Service Skills aims to notify individuals of the collection of their personal information before, or at the time of collection, or as quickly as possible thereafter. Notifications are usually in writing but may be verbal for telephone help-desk services, or research conducted by telephone interview.

- *VET data collections* – notification is given by registered training providers and apprenticeship centre's at the time of learner enrolment. This policy indicates that Quality Service Skills is a recipient of the data collected by these entities.
- *National VET surveys* – notification is provided in the letter of invitation to participate in the surveys and also at the time of collecting the information.
- *Quality Service Skills Staff* – Notification is provided on employment commencement

Disclosure of personal information

Quality Service Skills 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.

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

Quality Service Skills does not sell its mailing lists to third-parties for marketing purposes.

Quality Service Skills does not disclose personal information to overseas recipients.

Government identifiers

Quality Service Skills does not adopt or disclose a government related identifier of an individual as its own identifier, unless Quality Service Skills is authorised by law and prescribed by regulations to do so.

Quality Service Skills may use a government related identifier to identify an individual in relation to Quality Service Skills business activities; for example requiring an ABN number for the purpose of contracting services to suppliers and researchers, or asking for a Registered Training Organisation number for verifying a caller's credentials before providing assistance with the AVETMISS Validation Software (AVS) or the Competency Completion Online System (CCOS), or requiring staff tax file numbers for payroll and tax purposes.

Management of Personal Information

Quality of personal information

Quality Service Skills endeavors to ensure the personal information it collects and uses or discloses is accurate, up to date, complete and relevant. Quality Service Skills routinely updates the information held in its Student Management System. In addition to periodically checking with stakeholders if their personal contact details have changed.

Access to and correction of personal information

Individuals may, subject to the exceptions prescribed by the Australian Privacy Principles, request access to and correction of their personal information where this is collected directly from individuals by Quality Service Skills.

Quality Service Skills does not charge for giving access to or for correcting personal information.

Requests for access to or correction of personal information should be made in writing and addressed to the CEO at jackie@qss.edu.au. Requests will be answered as soon as is practicable.

Information retention and disposal

Personal information is held in paper-based and electronic format:

- Information collected for the national collections and national surveys is held in databases.
- Names and contact details of stakeholders are held in the Student Management System.
- Names and contact details collected for data and help-desk requests are held in electronic form in Quality Service Skills document management system.
- Personal staff information is held in MYOB
- Backup copies of all electronic files held in Quality Service Skills systems are kept in the event of system failure/loss. All backup copies of system files are secured.

Quality Service Skills retains personal information for as long as it is required for its business activities and functions, and for as long as we are legally required to retain the information or are required by or under a court/tribunal order to retain the information.

When personal information is no longer necessary for Quality Service Skills business functions, and it is lawful to do so, Quality Service Skills destroys or takes reasonable steps to de-identify the information.

Information security

Quality Service Skills takes active steps to protect personal information from misuse, interference and loss, and from unauthorized access, modification or disclosure.

- Quality Service Skills systems and internal network are protected from unauthorized 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 Quality Service Skills.
- Access to databases is protected through user log-on and password, and assignment of user access rights.
- All entities submitting data to Quality Service Skills for the national data collections must be registered and have a unique log-on and password.
- Names and addresses of individuals are removed before fieldwork contractors submit data to Quality Service Skills for the national surveys.

- Quality Service Skills premises is fully secured. Paper documents containing names and addresses are required to be locked away and shredded in confidential bins when destroyed. All hardware is properly 'sanitised' before disposal.

Learning Management System

Quality Service Skills utilizes both aNewSpring (ReadyLMS by RadyTech) and Catapult (for legacy students).

Catapult: The Catapult Privacy Policy and Security Policy can be found [here](#).

aNewSpring: The [Privacy Statement](#) and information on IT security is [here](#). aNewSpring is ISO27001 Information Security Management System certified.

Minimal personal information is maintained in the Learning Management Systems. Information is limited to student's full name and email address.

Student Management System

Quality Services Skills utilizes VETtrak, owned by ReadyTech. ReadyTech are the largest provider of employment and training services databases, are Right Fit For Risk accredited with the Department of Employment & Workplace Relations; and ISO27001 Information Security Management System certified.

Our Student Management system is hosted through a Virtual Private Network. All data held within VETtrak is stored, backed-up and securely maintained by ReadyTech. All data is held in servers within Australia. Their Privacy policy is [here](#)

Complaints and concerns

Complaints or concerns about Quality Service Skills management of personal information should be directed in writing to Quality Service Skills CEO at jackie@qss.edu.au Quality Service Skills will respond in writing as soon as practicable.

End Policy