

## Registered Training Organisation Privacy Policy

Australian Nursing and Training Services Pty Ltd in its operation as a Registered Training Organisation, has made its Privacy Policy clearer to reflect recent changes to Australian Privacy Laws and to ensure we are committed to and compliant with the Australian Privacy Principles (APPs) which came into effect on 12 March 2014.

Australian Nursing and Training Services complies with the Privacy Act 1988 (Commonwealth) and subsequently in accordance with the thirteen APP's outlined in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which prescribe and mandate the way organisations must collect, manage, use, secure, disclose and dispose of personal and sensitive information.

Australian Nursing and Training Services is committed to protecting the privacy of your personal information and we treat any information collected and retained with the respect and importance it deserves. We will be honest and transparent in relation to the way we manage your information.

Our Privacy Policy explains how we handle your personal information, including how it is used and potentially disclosed, importantly how it is stored and secured and additionally how you can access and update your personal information.

This policy only applies to our databases and files and does not cover any State, Territory or Commonwealth Government database or file. You are advised to contact the relevant government agency for a copy of their privacy policy.

### Why we collect personal information?

We collect personal information in order to provide clients with access to our training and associated services, and so we can better understand how we can improve our provision of services now and into the future. We collect personal information from staff members and prospective staff members, in order to fulfil normal conditions of employment, including character and reference checking and to meet state based licensing requirements and national regulatory compliance guidelines. Additionally, a large component of what we do as a Registered Training Organisation (RTO) requires us to collect personal information for mandatory statistical data as prescribed by government regulators.

To be clear though, people have the right not to provide us with personal information if they so choose, but if they decline to provide personal information, unfortunately we may not be able to:

- provide the product or service requested,
- enter into a business relationship with; or
- provide people with employment.

Australian Nursing and Training Services will only collect personal information that is required for the purposes of employment or education, or in meeting government reporting requirements and it will only be used for the specific purposes for which it was collected.

## What types of information do we collect in general?

So we can provide our range of services, we may have to collect personal information deemed necessary for us to supply people with the service they have requested or to provide employment opportunities for prospective staff.

The information we collect is defined under the current legislation as **personal** and **sensitive**, and information collected by us may fall into both categories. The following specific guidelines as defined in the Privacy Act are 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”.

In general terms, information collected will include:

- Solicited information: contact information such as name, organisation, position, address, telephone, and email, employment and educational histories, referees reports, date of birth and marital status.
- Information collected by Australian Nursing and Training Services which may be regarded as sensitive:
  - ‘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 National Centre for Vocational Education Research (NCVER) statistical data elements and is collected for national data reporting requirements.
  - ‘Dietary requirements’ (health-related) may be 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 and for training consultants involved with service delivery for us.
  - ‘Health and work injury information’ relating to the impact on students as a client using our services or on potential staff and our ability to provide a service without breaching a Duty of Care.

No sensitive information will be collected without a person’s express consent.

## What information do we collect using technology?

Our website is designed to provide useful information in relation to our services and events. To track the use of our website and to continually develop it to meet client needs, we may collect information about who has accessed our site and which pages were viewed so as to determine overall use patterns. We only use such information collected for statistical purposes and do not attempt to identify individual users.

As part of this we may use 'cookies'. Cookies are used to track information about users of a website. They do not contain any information that could identify people individually; they identify a computer to our servers. People may set their browser to refuse cookies if they do not wish to allow their use. Some areas of our website may not perform properly if cookies are not accepted.

## How do we collect information?

Australian Nursing and Training Services will make all endeavours where possible to collect personal information directly from an individual. We will collect all personal information in writing in the first instance, from an enrolment form that has come directly from a client or from induction paperwork for new staff members. If the case arises, some instances may require personal information to be collected indirectly from a parent or guardian for those under the age of 18.

Australian Nursing and Training Services also collects personal information through direct marketing on its website via:

- General enquiry email contact
- An alumni contact register (proposed development)

We will not collect any additional personal information other than for the purpose of ensuring we can deliver our services to a client and information will only be collected in a fair and lawful manner.

If we receive personal information indirectly (unsolicited) from a party other than a student or staff member, we will make a determination on whether the information needs to be retained in order to provide our services as previously explained, or whether the information can lawfully be destroyed or de-identified.

## Use and disclosure of personal information

We will make every effort to ensure that 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 people have been made aware of and have agreed to.

Australian Nursing and Training Services will not disclose, reveal, sell, share or pass personal sensitive information onto a third party, without express permission. Australian Nursing and Training Services does not sell its mailing lists to third parties for marketing purposes.

In some specific instances however, information **will** need to be passed to a third party, these include:

- Australian Skills Quality Authority (ASQA)
- Department of Education
- Department of Social Services
- State Departments of Education
- The National Centre for Vocational Education Research (NCVER)
- State based licensing authorities
- Previous employers for the purpose of reference checking

Only personal information required to comply with Federal or State based legislation for our scope of operation or Commonwealth contractual obligations, will be passed to these third parties and at no time will we disclose any personal information to overseas recipients.

If required to do so, we may disclose personal information to law enforcement authorities when required or authorised under an Australian law or a court/tribunal order, or where it is reasonable to do so if there has been a threat to life or we believe a criminal act or unlawful activity has been committed. We may also disclose information if a permitted health condition exists or a health condition eventuates that may require emergency medical care.

### **Direct Marketing**

Australian Nursing and Training Services does not sell its mailing lists to third parties for marketing purposes and will not use information for the purposes of direct marketing unless a person has given their permission for this to occur. We may use client testimonials on our website but they will not identify an individual by name unless express permission has been given.

Australian Nursing and Training Services will send out newsletters and corporate event information to existing and previous clients and to businesses aligned with our company. Anybody receiving information from us in error or who does not wish to receive such information, can contact us on 02 9542 3340 and request to have their name removed from our mailing lists.

### **Government related identifiers**

Australian Nursing and Training Services does not adopt or disclose a government related identifier of an individual as its own identifier, unless we are authorised by law and prescribed by regulations to do so.

In the course of our provision of services as an Registered Training Organisation (RTO), we may use a government related identifier, for example, Australian Nursing and Training Services uses contracted training staff who operate as sole traders and we will collect an Australian Business Number (ABN) for the purpose of contracting services.

We may also need to collect government related identifiers, such as a Medicare Card number, passport details or a drivers licence in order to fulfil our obligations under Federal Law in the conduct of our operations as an Registered Training Organisation (RTO).

## Management of personal information and its 'Quality'

Australian Nursing and Training Services endeavours to ensure personal information is accurate, up to date, complete and relevant. We will as a matter of course, routinely update personal information in our Student Management and Customer Relations Management systems.

We invite previous clients to keep their contact details up to date by requesting this through our online email contact at [admin@austnursing.com.au](mailto:admin@austnursing.com.au) and internal policy prescribes that anytime we contact a former client, we will ask if personal information is up to date and accurate. Australian Nursing and Training Services does not charge a fee for accessing or correcting personal data.

## Retention and disposal of information and information security

Personal information is held at Australian Nursing and Training Services in both electronic and paper format. We take all reasonable steps to protect personal information from misuse, loss and from unauthorised access or disclosure. Australian Nursing and Training Services is currently moving toward a paperless working environment by scanning all student data (new and existing), into our Student Management System.

Specifically information is retained:

- In our Student Management and Customer Relations Management Systems which hosts data externally with a third party and is secured in alignment with Commonwealth standards. The system is encrypted accordingly and secured with personalised user account passwords.
- For a period of time in hard copy archive, secured on site in locked cabinets.
- Periodically on Australian Nursing and Training Services' systems and databases which are secured with individual user account passwords and user access privileges.
- On hard copy backup drives which are retained in the event of system failure or loss. All backup copies of these drives are held securely on site.
- Australian Nursing and Training Services adopts a clear desk policy at close of business for documents containing personal information.
- Paper documents containing personal information which need to be destroyed will be sent for secure destruction with a commercial contractor.

We will retain personal information for as long as we are required to do so to conduct business activities in line with Commonwealth legislation or other legal requirements. This may include the retention of some personal information for up to 30 years. As soon as personal information or components of it are no longer required, and it is lawful to do so, Australian Nursing and Training Services will take all reasonable steps to destroy and/or de-identify the information.

## Complaints

If you have a complaint or concern about the way Australian Nursing and Training Services has managed or is managing your personal information, you should direct this in writing to 'Australian Nursing and Training Services Compliance' electronically using [admin@austnursing.com.au](mailto:admin@austnursing.com.au) or via post to:

**The Manager**  
**Australian Nursing and Training Services**  
**P.O. Box 645**  
**Sutherland NSW 2232**

We will provide a response within 7 business days of receiving the grievance. If you do not receive a reply within this timeframe, please contact the **Registered Training Organisation (RTO) Manager Australian Nursing and Training Services** on 02 9542 3340.

## Contact Information

For all other privacy related enquiries, students are to contact Australian Nursing and Training Services Administration on 02 9542 3340 or [admin@austnursing.com.au](mailto:admin@austnursing.com.au) . Existing staff can ask to speak to the Registered Training Organisation (RTO) Manager (training staff) or the Business Manager (Administration staff).

## Summary

This policy relates to the operation of Australian Nursing and Training Services both as a business and a Registered Training Organisation (RTO). A copy of this policy is also available on our website at <http://www.austnursing.com.au/>

Further information on legislation and the APP's navigate to:  
<https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles>