



PRIVACY POLICY

Privacy Policy Quest College Policy #: 00
Effective Date: 08/072016 draft

Revised:

Purpose: The Privacy Act 1988 requires entities bound by the Australian Privacy Principles to have a privacy policy.

Additional Authority:
CEO and Senior Management

Scope:
This policy applies to Quest College providing guidelines for the collection, retention, use, disclosure and destruction of personal and/or sensitive information across all operations.

Responsible Designation:
Chief of Operations

Related documents/publications/policies:

- Privacy Amendment (Enhancing Privacy Protection) Act 2012
 - Privacy Act 1988 (Privacy Act) including the Australian Privacy Principles
 - Data Provision Requirements 2012
 - Standards for Registered Training Organisations 2015
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POLICY AND PROCEDURE FRAMEWORK

This document consists of the following sections:

- 1.1 Policy Statement
- 1.2 Collection of Your Personal (including sensitive) Information
- 1.3 Analytic, session and cookie tools
- 1.4 Complaints and appeals
- 1.5 Disclosure
- 1.6 Quality of personal information
- 1.7 Storage and security of personal information
- 1.8 Accessing and correcting your personal information

1.1 Policy Statement

Quest College collects, holds, uses, discloses and destroys personal information required to carry out functions or activities as a Registered Training Organisation.

These functions and activities include:

- Collecting personal information from prospective students for the purpose of providing information related to our courses and other services
- Collecting personal information for the purpose from enrolling students to establish course entry eligibility requirements, enable enrolment to occur, maintain ongoing communications within and post the enrolment period, issues awards, Statements of Attainments, results records
- Providing student personal information, enrolment activity and outcomes, as required, for the purpose of mandated reporting, audit, investigations or, as requested, to State and Federal regulatory authorities
- Providing student personal information, enrolment activity and outcomes, as required, for the purpose of reporting to non-government agencies such as Job Services Australia, Disability Support Services. (An Information Release form may need to be provided)
- Where applicable, for the purpose of communications with and from employers where the prospective, current or past student is, may be or has been an Australian Apprentice with said employer.

1.2 Collection of Your Personal (including sensitive) Information

What information do we collect?

For the purpose of providing pre-enrolment and enrolment information to prospective and enrolling students, certain personal information is required to be collected from prospective students and current enrolled students. Generally, information collected includes:

- Name
- Address
- Date of Birth
- Gender
- Contact Details
- Payment Details
- Financial Details
- Electronic details such as email address and IP address
- AVETMISS information to comply with the Data Provisions Requirements 2012 such as: disability (if applicable), educational history, ethnicity, English, literacy and numeracy proficiency.

At all times we try to only collect the information we need for the particular function or activity we are carrying out. For example, we may only require a name and email address to provide pre-enrolment information.

How do we collect the information?

The main way we collect personal information about you is when you give it to us, for example, we collect personal information such as listed above from you at or when you complete an enrolment form.

Collecting sensitive information

Sometimes we may need to collect sensitive information about you, for example, as a legislative requirement, to provide adequate student support services or to handle a complaint. This might include information about, for example, your health, racial or ethnic origin, association memberships, religious beliefs or criminal history. Computer access names and passwords set on college or personal computers, laptops or tablets may be requested for the purpose of assisting students with problem with their devices. This must be at the request of the individual and for access to their own device and not those of other students.

Indirect collection of personal information

We may collect personal information (including sensitive information) about you from other organisations (such as schools or employers) who you allow to act on your behalf or represent you for the purposes of seeking pre-enrolment information or enrolling in a course. During the management and resolution of a complaint, or appeal, we may collect personal information (including sensitive information) about you indirectly from publicly available sources or from third parties such as:

- your authorised representative, if you have one
- applicants, complainants, respondents to a complaint
- employers or work placement hosts and their representatives where applicable

We also collect personal information from publicly available sources to enable us to contact stakeholders who may be interested in the services we provide or working for with or us.

Collecting through our websites

Where our website www.questcollege.com.au allows you to make comments or give feedback we collect your email address and sometimes other contact details. We may use your email address to respond to your feedback. We store this personal information on servers located in Australia.

1.3 Analytic, session and cookie tools

We use a range of tools provided by third parties, including Google, Bing and may include our web hosting provider, to collect or view website traffic information.

These sites have their own privacy policies. We also use cookies and session tools to improve your experience when accessing our websites. The information collected by these tools may include the IP address of the device you are using and information about sites that IP address has come from, the pages accessed on our site and the next site visited. We use the information to maintain, secure and improve our websites and to enhance your experience when using them. In relation to Google Analytics you can opt out of the collection of this information using the Google Analytics Opt-out Browser Add-on.

Social networking services

We use social networking services such as Facebook, Twitter and YouTube to communicate publically news, social and RTO services information. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service providers will also handle your personal information for its own purposes. These sites have their own privacy policies.

Email lists

We collect your email and, if you provide it, other contact details when you subscribe to our email lists. We only use this information for the purpose of sending you regular updates on our RTO activities and services, and to administer the lists.

Student Management System and Learning Management System

We use a Student Management System (SMS) and a paper based Learning Management System (LMS) to manage enrolments, information, academic outcomes, learning and assessment activities and to retain the information to meet organisational and legislative and regulatory requirements.

Our current SMS is Job Ready. We are required to retain your personal information and details and copies of any qualifications, Statements of Attainment and Accredited competency outcomes from assessed AQF qualifications and Accredited Courses for a period of 30 years.

Quest College is currently investigating a Customer Relationship Management (CRM) component or system for the management of prospective and current information. This component will manage the initial contact information collected from various marketing and sales or direct customer contact information prior to an offer of enrolment being made. The CRM will also be used for Direct Marketing activities to prospective and current students. Permissions within the system manage the privacy of information relating to different roles within the organisation. In the event of a change to the Student Management System a back-up copies of the previous systems will be securely retained on our server.

Quest College currently uses a paper-based system for our Learning Management. The College is currently investigating other electronic Learning Management System (LMS) options that will be designed to provide educators, administrators and learners with a single robust, secure and integrated system. Collected personal information may be used to establish student accounts in the LMS to enable access to learning and assessment content and activities. The LMS incorporates our own and third party learning and assessment resources (IBSA).

Anonymity

In some circumstances, the College may be able to interact with people who wish to remain anonymous. For example, if you contact our Enquiries line or comment in our Social Media forums with a general question we will not ask for your name unless we need it to adequately handle your question. However, for the majority of our activities we require your name and contact information and enough information about the particular matter to enable us to fairly and efficiently handle your inquiry, request, complaint, application or enrolment.

1.4 Complaints and appeals

If you make a complaint or wish to appeal a decision, we will usually give a copy of the complaint or application to the respondent and, where relevant, affected third parties. If a complainant or applicant requests that only limited information is disclosed to the respondent, we may not have enough information to be able to fairly proceed with the matter. The respondent must have sufficient information to respond to the matter in a meaningful way.

External Appeals

We may disclose personal information to another review body if a complainant, applicant or respondent seeks an external review of the College's decision or makes a complaint to, for example, the Commonwealth Ombudsman.

How to make a complaint

If you wish to complain to us about how we have handled your personal information you should let us know in writing. If you need help lodging a complaint, you can contact us. If we receive a complaint from you about how we have handled your personal information, we will determine what action we should take to resolve the complaint. If we decide that a complaint should be investigated further, the complaint will usually be handled by a more senior officer than the officer whose actions you are complaining about. We will assess and handle complaints about the conduct of an employee or contractor of the College using our Code of Conduct. We will promptly acknowledge that we have received your complaint in accordance with our Complaints Policy. If you are not satisfied with

our response you may ask for a review by a more senior officer of the College (if that has not already happened) or you can complain to the Commonwealth Ombudsman.

1.5 Disclosure

We are required by law to provide data, which includes personal information, including sensitive information, to Government departments and agencies at a State and Federal level. For example, we are required to provide data to the National Centre for Vocational Education Research who administers the AVETMISS data collection in accordance with National VET Provider Collection and the Data Provision Requirements 2012. We are also required to confirm and verify student enrolment and attendance and participation information to the Department of Human Services (Centrelink) for students receiving payments such as Abstudy, Austudy and Youth Allowance. We may also be required to provide personal and academic participation information to Job Servicers Australia (JSAs) and similar organisations for the purpose of you enrolling in courses and/or identifying your participation in training activity.

All information requests from third parties that aren't a Governing body will require a completed Release of Personal Information Form.

Disclosure for the purpose of marketing and promotions

Occasionally the College may use your personal information, usually limited to your name and qualification in which you are or were enrolled for the purpose of promoting the RTO services.

You have an opportunity to opt out by indicating your choice on *our enrolment form*. If you do not wish to participate in promotional activities related to our services and your achievements and experiences, we provide and opt out option on *our enrolment forms*. Where an *enrolment form* is not the appropriate form to seek your permission a separate *Media Release Form* will be provided to seek your permission to use your image, testimonials, video recordings, interviews etc.

Disclosure of sensitive information

We only disclose your sensitive information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect or if you agree.

1.6 Quality of personal information

To ensure that the personal information we collect is accurate, up-to-date and complete we:

- record information in a consistent format

- where necessary, confirm the accuracy of information we collect from a third party or a public source
- promptly add updated or new personal information to existing records
- review our contact lists to check their accuracy.

We also review the quality of personal information before we use or disclose it. Throughout your enrolment and prior to receiving your Qualification you are required to update your personal information and, where applicable, your sensitive information, to ensure our records are current.

1.7 Storage and security of personal information

We take steps to protect the security of the personal information we hold from both internal and external threats by:

- assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure that information
- taking measures to address those risks, for example, we keep a record (audit trail) of when someone has added, changed or deleted personal information held in our electronic databases and regularly check that staff only access those records when they need to
- conducting regular internal and external audits to assess whether we have adequately complied with or implemented these measures.

For further information on the way we manage security risks in relation to personal information we hold see our supplementary material on information technology security practices, below. We destroy personal information in a secure manner when we are no longer required by law to retain it or it is not needed for other business purposes.

1.8 Accessing and correcting your personal information

Under the Privacy Act (Australian Privacy Principles 12 and 13) you have the right to ask for access to personal information that we hold about you, and ask that we correct that personal information. You can ask for access to, or correction of, your personal information by contacting us. If you ask, we must give you access to your personal information, and take reasonable steps to correct if it is considered incorrect, unless there is a law that allows or requires us not to.

We will ask you to verify your identity before we give you access to your information or correct it. If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons. If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to. If we refuse to correct your personal information, you can ask us to provide a statement that you believe the information is incorrect and why.