



PRIVACY OF INFORMATION POLICY AND PROCEDURE

Purpose

This policy and procedure describes the commitment of ACE to abide by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 and in accordance with the Victorian information privacy principles set out in the *Information Privacy Act 2000*. This policy and procedure also aims to describe the type of information ACE collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed and corrected.

This policy and procedure also provides guidance to ACE on the management of its records, ensuring accuracy and integrity, of information ACE collects from students/applicants and is designed to ensure ACE complies with 2022 Standard VET Funding Contract - Skills First Program, 2022 Guidelines about Eligibility Skills First Program; Skills Quality Charter; 2022 Guidelines about Apprenticeship / Traineeship Training Delivery - Skills First Program; VET Quality Framework, USI Registry requirements and the Standards for Registered Training Organisations (RTOs) 2015.

This policy is to be read in conjunction with the following policies and procedures:

- Formalisation of Enrolment Policy and Procedure
- Issuance of AQF Qualification Policy and Procedure
- Monitoring Course Progress and Attendance Policy and Procedure
- Feedback and Data Analysis Policy and Procedure
- Compliance with legislation Policy and Procedure
- USI Policy and Procedure
- Complaints and Appeals Policy and Procedure

Scope

This policy and procedure applies to all applicants and students enrolled at ACE and relevant staff involved in handling student information.

Definitions

AVETMISS	The agreed national data standard for the collection, analysis and reporting of vocational education and training information.
Australian law	Means: a) an Act of the Commonwealth or of a State or Territory; or b) regulations, or any other instrument, made under such an Act; or c) a Norfolk Island enactment; or d) a rule of common law or equity.
APP Complaint	a complaint about an act or practice that, if established, would be an interference with the privacy of an individual because it breached an Australian Privacy Principle.
Applicable Code of Practice	in relation to an organisation, means an approved code of practice by which the organisation is bound under, the <i>Information Privacy Act 2000</i> .
Confidential Information	means all confidential or commercially sensitive information of a Party, but does not include information that is already in the public domain (other than due to a breach of the 2022 Standard VET Funding Contract - Skills First Program)

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Code of Practice	means a code of practice as defined in, and approved under, the <i>Information Privacy Act 2000</i> .
Australian Privacy Principle (APP)	<p>The Australian Privacy Principles (or APPs) are the cornerstone of the privacy protection framework in the Privacy Act 1988 (Privacy Act). They apply to any organisation or agency the Privacy Act covers. There are 13 Australian Privacy Principles and they govern standards, rights and obligations around:</p> <ul style="list-style-type: none"> • the collection, use and disclosure of personal information • an organisation or agency’s governance and accountability • integrity and correction of personal information • the rights of individuals to access their personal information <p>The Australian Privacy Principles are principles-based law. This gives an organisation or agency flexibility to tailor their personal information handling practices to their business models and the diverse needs of individuals. They are also technology neutral, which allows them to adapt to changing technologies.</p> <p>A breach of an Australian Privacy Principle is an ‘interference with the privacy of an individual’ and can lead to regulatory action and penalties.</p>
Court / Tribunal Order	<p>an order, direction or other instrument made by:</p> <ol style="list-style-type: none"> a) a court; or b) a tribunal; or c) a judge (including a judge acting in a personal capacity) or a person acting as a judge; or d) a magistrate (including a magistrate acting in a personal capacity) or a person acting as a magistrate; or e) a member or an officer of a tribunal; <p>and includes an order, direction or other instrument that is of an interim or interlocutory nature.</p>
Data Breach	Where personal information is held by an organisation and is lost or subjected to unauthorised access, use, modification, disclosure or other misuse.
Department	means the State of Victoria acting through the Department of Education and Training (or its successor).
Data Provision Requirements	are the requirements for data provision as agreed by the Industry and Skills Council and implemented by the VET Regulator as required by its governing legislation.
De-Identified (Information)	personal information is de-identified if the information is no longer about an identifiable individual or an individual who is reasonably identifiable.



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Government Related Identifier (of An Individual)	an identifier of the individual that has been assigned by: a) an agency; or b) a State or Territory authority; or c) an agent of an agency, or a State or Territory authority, acting in its capacity as agent; or d) a contracted service provider for a Commonwealth contract, or a State contract, acting in its capacity as contracted service provider for that contract.
Personal Information	means 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 reasonably be ascertained, from the information or opinion. Types of information that are specific to an individual for example name, address, contact details or bank account details.
Personal Privacy	means privacy of personal information;
Records	means any 'document' within the meaning of the Evidence Act 2008 (Vic) that is created by the Training Provider or any Training Provider Personnel, or is in or enters the possession of the Training Provider or any Training Provider Personnel, under or in the course of the Training Provider performing its obligations under the 2022 Standard VET Funding Contract – Skills First Program.
Sensitive Information	A type of personal information that is sensitive in its nature – for example race or ethnic origin, political opinion, religious belief or affiliation, medical history or criminal record.
Student Identifier	student identifier means an identifier assigned to an individual by the Registrar under section 10 or 12 of Student Identifiers Act 2014. It is a unique combination of any or all of the following: letters; numbers; symbols.
SVTS	Skills Victoria Training System (SVTS) – The Department's IT system for managing contracts between the Victorian Skills Department and RTOs for delivery of Victorian government subsidised training.



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<p>Permitted General Situation</p>	<p>circumstances that provide exemptions to the general limitations on the collection, use and disclosure of personal information:</p> <ol style="list-style-type: none"> 1. To lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety 2. To take appropriate action in relation to suspected unlawful activity, or misconduct of a serious nature 3. To locate a person who has been reported as missing 4. For the establishment, exercise or defence of a legal or equitable claim 5. For the purposes of a confidential alternative dispute resolution process 6. For the entity's diplomatic or consular functions or activities 7. For war or warlike operations; peacekeeping or peace enforcement; civil aid; humanitarian assistance, medical or civil emergency or disaster relief occurring outside Australia and the external territories <p>https://www.righttoknow.org.au</p>
<p>Permitted Health Situation</p>	<p>This permitted health situation applies when an organisation discloses health information about an individual, and:</p> <ul style="list-style-type: none"> • the organisation provides a health service to the individual • the recipient of the information is a responsible person for the individual • the individual is either physically or legally incapable of giving consent to the disclosure, or physically cannot communicate consent to the disclosure • another individual providing the health service for the organisation (the 'carer') is satisfied that either the disclosure is necessary to provide appropriate care or treatment of the individual, or the disclosure is made for compassionate reasons • the disclosure is not contrary to any wish expressed by the individual before the individual became unable to give or communicate consent of which the carer is aware or of which the carer could reasonably be expected to be aware, and • the disclosure is limited to the extent reasonable and necessary to provide appropriate care or treatment of the individual or to fulfil the purpose of making a disclosure for compassionate reasons <p>https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines</p>

Policy

1.0 General

- 1.1 ACE shall collect personal information only by lawful and fair means.
- 1.2 ACE shall collect personal information about an individual only from the individual unless it is unreasonable or impracticable to do so.
- 1.3 ACE shall ensure that the personal information of the entity it collects is accurate, up-to-date and complete.
- 1.4 ACE shall ensure that the personal information that it uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant.
- 1.5 ACE shall notify the individual if it collects information about the individual from someone other than the individual:

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- 1.5.1 The fact that ACE will collect or has collected the information and the circumstances and purpose of that collection;
 - 1.5.2 If the collection of the personal information is required or authorised by or under an Australian law or a court/tribunal order—the fact that the collection is so required or authorised (including the name of the Australian law, or details of the court/tribunal order, that requires or authorises the collection);
 - 1.5.3 The main consequences (if any) for the individual if all or some of the personal information is not collected by ACE.
 - 1.5.4 Any person, body or organisation to which ACE usually discloses personal information of the kind collected by ACE;
 - 1.5.5 Whether ACE is likely to disclose the personal information to overseas recipients – the countries in which such recipients are likely to be located if it is practicable to specify those countries.
- 1.6 Where ACE receives unsolicited information, ACE shall, as soon as practicable but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified.
 - 1.7 ACE shall provide information about how the individual may access the personal information about the individual that is held by ACE and seek the correction of such information.
 - 1.8 ACE shall provide information about how the individual may complain about a breach of the Australian Privacy Principles, and how ACE will deal with such a complaint.

Domestic students only:

- 1.9 ACE shall not, without prior written approval of the Department, disclose (or permit the disclosure of) information regarding the 2022 Standard VET Funding Contract - Skills First Program (herein “the Contract”; including details of the Funds paid for any individual) or any Confidential Information of the Department or the State, except:
 - to the extent required under this Contract;
 - to the extent required by Law;
 - to its solicitors, barristers and/or other professional advisors in order to obtain advice in relation to its rights under this Contract, the Training Services or the Funds and provided such advisors are under a duty of confidentiality;
 - to the extent necessary for the registration or recording of documents where required; and/or
 - to the extent required in connection with legal proceedings,and then only to the extent strictly necessary for that purpose.
- 1.10 ACE acknowledges that the Department may disclose or otherwise make available (whether to the public generally or to any particular person or group of persons) any information relating to ACE and the Contract (including Confidential Information of ACE), as it considers reasonably appropriate to facilitate the proper operation of the Contract including:
 - program details;
 - government-subsidised fee information;
 - details of the Funds paid;

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- the results of any surveys ACE participates in as required by Clause 4.9(h)(ii), or the results of any student or employer surveys administered by, or on behalf of, the Department;
- any information that ACE is required to publish on its website or otherwise make publicly available under the Contract;
- details of any non-compliance by ACE with the Contract;
- any action taken by the Department under the Contract;
- findings and outcomes of any audits, reviews or investigations under this Contract; and
- fee information related to training subsidised through the Skills First Program on an individual Training Provider basis, as reported by ACE.

1.11 ACE acknowledges that the Department may disclose information referred to in 1.10, and any information regarding any suspected non-compliance by ACE with this Contract, for the purpose of satisfying its obligations under:

- the Freedom of Information Act 1982 (Vic);
- the Ombudsman Act 1973 (Vic);
- the Audit Act 1994 (Vic); or
- the requirements of Parliamentary accountability or a Minister's obligations to fulfil their duties of office

1.12 ACE shall take all steps and make all efforts to assist the Department in complying with any of these obligations in 1.11.

1.13 ACE acknowledges that the Department may disclose information referred to 1.10 and 1.11 to the counterparty to any Other VET Funding Arrangement, any regulator who has responsibility for issuing or monitoring compliance with ACE's status as a registered training organisation, or to another government entity in any jurisdiction that has an interest in the regulation and funding of the VET sector.

1.14 ACE is bound by the information privacy principles set out in the Privacy and Data Protection Act 2014 (PDP Act), and any applicable code of practice under it, for any act done, practice it engages in, under or in connection with this Contract in the same way and to the same extent as the Department would have been bound had it been directly done or engaged in by the Department.

2.0 Collecting and Holding Information

2.1 ACE shall not collect personal information (other than sensitive information) unless the information is reasonably necessary for one or more of its functions or activities.

2.2 ACE shall not collect sensitive information about an individual unless:

- 2.2.1 the individual consents to the collection of information and the information is reasonably necessary for one or more of its functions or activities, or:

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- 2.2.2 the collection of the information is required or authorised by or under an Australian law or a court/tribunal order; or
 - 2.2.3 a permitted general situation exists in relation to the collection of the information; or
 - 2.2.4 a permitted health situation exists in relation to the collection of the information.
- 2.3 ACE shall take reasonable steps to ensure that the personal information that it holds is protected from:
- 2.3.1 misuse, interference and loss; and
 - 2.3.2 unauthorised access, modification or disclosure.
- 2.4 ACE shall take reasonable steps to ensure that the personal information that it holds is de-identified or destroyed, if:
- 2.4.1 It no longer needs the information for any purpose for which the information may be used or disclosed; and
 - 2.4.2 The information is not contained in the Commonwealth record; and
 - 2.4.3 ACE is not required by or under an Australian law, or a court/tribunal order, to retain the information.

Domestic students only:

- 2.5 In collecting any Personal Information for the purposes of this Contract, ACE shall ensure that it has obtained all necessary consents, in accordance with all applicable Laws, including the Privacy and Data Protection Act 2014, the Health Records Act and (if applicable) the Privacy Act 1988 (Cth), for:
- ACE to collect, use, hold and disclose that Personal Information, including by disclosing it to the Department as contemplated by this Contract (including by way of the submission of reports and other information under Clause 7 and Clauses 10 and 11 of Schedule 1, for the purposes of complying with Record disclosure obligations under Clause 10 and in the course of any audit, review or investigation under Clause 11); and
 - the Department to collect, use, hold and disclose that Personal Information for the purposes of the Contract and its operation and management of the Contract.
- 2.6 ACE shall cooperate with, and provide any assistance requested by, the Department in relation to:
- resolving any complaint made to the Department alleging a breach of the Privacy and Data Protection Act 2014 or the Health Records Act about any Personal Information collected, used, held or disclosed by the Department that was provided to it by the Training Provider in connection with the Contract; and
 - providing access to or amendment of any record of Personal Information collected, used, held or disclosed in connection with the Contract following a request from an individual made to the Department.
- 2.7 If ACE becomes aware of any:
- breach of any of 1.14, 2.5, 2.6 ;

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- unauthorised disclosure, use, modification or access, attempted unauthorised disclosure, use, modification or access, or misuse or loss of any Personal Information collected or held for the purposes of this Contract; or
- act or practice of ACE which causes a failure by the Department to comply with its obligations under the Privacy and Data Protection Act 2014 or the Health Records Act,

ACE shall notify the Department via the SVTS and cooperate with the Department in any investigation or other steps taken by the Department in response to that matter.

3.0 Using and Disclosing Personal Information

- 3.1 ACE shall not use or disclose personal information about an individual for another purpose (secondary purpose) other than the particular purpose (primary purpose) for which the information was collected, unless:
- 3.1.1 the individual has consented to the use or disclosure of the information; or
- 3.1.2 the individual would reasonably expect ACE to use or disclose the information for the secondary purpose and the secondary purpose is:
- a. if the information is sensitive information—directly related to the primary purpose; or
 - b. if the information is not sensitive information—related to the primary purpose; or
- 3.1.3 the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- 3.1.4 a permitted general situation exists in relation to the use or disclosure of the information by ACE; or
- 3.1.5 a permitted health situation exists in relation to the use or disclosure of the information by ACE; or
- 3.1.6 ACE reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- 3.2 ACE shall not use or disclose personal or sensitive information about an individual for the purpose of direct marketing, unless:
- 3.2.1 ACE collected the information from the individual; and
- 3.2.2 The individual has consented to the use or disclosure of the information for that purpose.
- 3.3 ACE shall not disclose information about an individual to an overseas recipient, unless:
- 3.3.1 After being so informed, the individual consents to the disclosure.
- 3.3.2 The disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- 3.3.3 A permitted general situation exists in relation to the use or disclosure of the information by ACE; or

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- 3.4 Where ACE discloses information about an individual to an overseas recipient, ACE shall take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.
- 3.5 ACE shall not use or disclose a government related identifier (e.g., Unique Student Identifier) of an individual unless:
- 3.5.1 the use or disclosure of the identifier is reasonably necessary for ACE to verify the identity of the individual for the purposes of its activities or functions; or
 - 3.5.2 the use or disclosure of the identifier is reasonably necessary for ACE to fulfil its obligations to an agency or a State or Territory authority; or
 - 3.5.3 the use or disclosure of the identifier is required or authorised by or under an Australian law or a court/tribunal order; or
 - 3.5.4 A permitted general situation exists in relation to the use or disclosure of the identifier; or
 - 3.5.5 ACE reasonably believes that the use or disclosure of the identifier is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

4.0 Accessing Personal Information

- 4.1 ACE shall, on request by the individual, give the individual access to the information it holds of the individual.
- 4.2 ACE shall not give the individual access to the personal information to the extent that:
- 4.2.1 It reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
 - 4.2.2 giving access would have an unreasonable impact on the privacy of other individuals; or
 - 4.2.3 the request for access is frivolous or vexatious; or
 - 4.2.4 the information relates to existing or anticipated legal proceedings between ACE and the individual, and would not be accessible by the process of discovery in those proceedings; or
 - 4.2.5 giving access would reveal the intentions of ACE in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
 - 4.2.6 giving access would be unlawful; or
 - 4.2.7 denying access is required or authorised by or under an Australian law or a court/tribunal order; or
 - 4.2.8 both of the following apply:
 - i. ACE has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to ACE's functions or activities has been, is being or may be engaged in;
 - ii. giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or

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4.2.9 giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or

4.2.10 giving access would reveal evaluative information generated within ACE in connection with a commercially sensitive decision-making process.

4.3 ACE shall respond to the request for access to the personal information:

4.3.1 within a reasonable period after the request is made; and

4.3.2 give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so.

4.4 If ACE decides to refuse to give access to the information in the manner requested by the individual, ACE shall take such steps as are reasonable in the circumstances to give access in a way that meets the its needs and the needs of the individual.

4.4.1 ACE shall give the individual a written notice that sets out:

- i. the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
 - may include an explanation for the commercially sensitive decision.
- ii. the mechanisms available to complain about the refusal; and
- iii. any other matter prescribed by the regulations.

5.0 Correcting Personal Information

5.1 ACE shall take such steps as are reasonable in the circumstances to correct the personal information held if:

5.1.1 having regard to a purpose for which the information is held, the information is inaccurate, out-of-date, incomplete, irrelevant or misleading; or

5.1.2 the individual requests the entity to correct the information.

5.2 ACE shall take such steps (if any) as are reasonable in the circumstances to give notification to third parties, unless it is impracticable or unlawful to do so, if:

5.2.1 ACE corrects personal information about an individual that it has previously disclosed to third parties; and

5.2.2 The individual requests ACE to notify the third parties of the correction.

5.3 If ACE refuses to correct the personal information as requested by the individual, ACE shall give the individual a written notice that sets out:

5.3.1 the reasons for the refusal except to the extent that it would be unreasonable to do so; and

5.3.2 the mechanisms available to complain about the refusal; and

5.3.3 any other matter prescribed by the regulations.

5.4 If ACE refuses to correct the personal information as requested by the individual, and the individual requests to associate a statement with the information that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, ACE shall take such steps as are reasonable in the

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circumstances to associate the statement in such a way that will make the statement apparent to users of the information.

- 5.5 If ACE receives a request from an individual to correct the personal information it holds about the individual, ACE shall:
- 5.5.1 respond within a reasonable period after the request is made; and
 - 5.5.2 not charge the individual for the making of the request, for correcting the personal information or for associating the statement with the personal information (as the case may be).

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Procedures

1.0 Collection of Information

- 1.1 ACE will collect personal information about students undertaking nationally recognised training and disclose this personal information to the National Centre for Vocational Education Research (NCVER), the national professional body responsible for collecting, managing, analysing and communicating research and statistics on the Australian vocational education and training (VET) sector. This is done via AVETMISS, a national data standard which ensures the consistency and accuracy of vocational education and training (VET) information.
- 1.2 Personal information will be collected through course applications or enrolment forms, training and assessment records and submissions, such as:
 - the individual's personal details, including alias or previous name, date of birth and gender
 - the individual's current contact details and address
 - academic history / prior education / training history
 - employment information (if applicable)
 - English language proficiency including the name of the test and the score received
 - Visa information
 - Passport information

2.0 Unique Student Identifier

- 2.1 All students participating in a nationally recognised training are required to have a Unique Student Identifier (USI) and provide it to ACE upon enrolment. Alternatively, upon the request of the student, ACE can apply for a USI on behalf of the student.
- 2.2 In order to apply for a USI on behalf of the student, and as authorised by the student, ACE will:
 - 2.2.1 collect personal information such as:
 - Complete name (surname or family name, first or given name, and middle name)
 - date of birth
 - city or town of birth
 - country of birth
 - gender
 - contact details
 - 2.2.2 verify the identity of the student by collecting a copy of a valid identification document. This document will only be used for the purpose of securing a USI and will be securely destroyed after its use.
- 2.3 Students will be informed that the information provided relating to their application for USI:
 - 2.3.1 may be disclosed to entities such as, but not limited to:
 - Commonwealth and state or territory government departments and agencies and statutory bodies performing functions relating to VET
 - VET Related Bodies (VRB) <https://www.usi.gov.au/providers/VABs-and-VRBs>
 - VET Admission Bodies (VAB) <https://www.usi.gov.au/providers/VABs-and-VRBs>

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- National Centre for Vocational Education Research (NCVER)
 - any entity contractually engaged by the Student Identifiers Registrar to facilitate the administration of the USI system
- 2.3.2 will not otherwise be disclosed without the student's consent unless authorised or required by or under the law.
- 2.3.3 If incomplete, the student will not be issued a USI, and therefore, ACE will be unable to issue an AQF qualification or statement of attainment.

3.0 Storage and Use of Information

- 3.1 ACE will store all records containing personal information securely and will take all reasonable measures to protect it from unauthorised access, misuse or disclosure.
- 3.1.1 Paper-based files will be kept in the student's individual student file and stored in a secure filing cabinet/room.
 - 3.1.2 Electronic files will be stored securely and will be accessed only by relevant staff
- 3.2 ACE will only use personal information for purposes of:
- 3.2.1 Student administration
 - 3.2.2 Monitoring course progress, attendance and outcomes
 - 3.2.3 Issuance of qualifications and statements of attainment (to eligible students)
 - 3.2.4 Compliance of student visa requirements (if required)
- 3.3 Any personal information will not be used for other purposes without the consent of the student, such as for marketing purposes.

4.0 Disclosure of Information

- 4.1 ACE will inform the student of any disclosure of personal information to another person or organisation and seek the consent of the student, unless the disclosure is:
- 4.1.1 Necessary to prevent serious threat to the life, health or safety of any individual, or to public health or public safety;
 - 4.1.2 Required or authorised by, or under, the law
 - 4.1.3 Reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- 4.2 ACE will not permit any person or organisation to which personal information is disclosed to use or disclose the information for purposes other than that for which the information was provided to them.

5.0 Access to and Correction of Records

- 5.1 Students may request access to or obtain a copy of the information held about them by contacting ACE head office and providing valid identification.
- 5.2 Students may request for correction of the information held about them by contacting ACE, providing valid identification and valid reason for correction.

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6.0 Complaints about Privacy

6.1 Any individual who wish to make a complaint about the manner by which ACE handled their information may do so by following the Complaints and Appeals Policy and Procedure.

Legislative Context

- Standards for RTOs 2015
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- ESOS Act 2000
- Student Identifier Act 2014
- 2022 Standard VET Funding Contract – Skills First Program
- Privacy Act 1988 (Clth)
- Information Privacy Act 2000 (Vic)
- Privacy and Data Protection Act 2014 (Vic)
- Victorian Health Records Act 2001 (the Act)

Related Forms / Documentation

- Pre-enrolment form (Domestic)
- Enrolment Form (Domestic) & (International)
- Letter of Offer and Statement of Fees Acceptance Agreement
- Payment Plan and Agreement
- Pre-Enrolment Brochure
- Student Handbook
- Agent Handbook

Responsible Parties

The CEO, Compliance Manager, relevant staff and students of ACE are responsible for the use and implementation of this policy.

Version History

Version	Date	Description of changes
4.0	18.01.2022	Updated document to add Version History section; and minor contractual changes.
3.0	01.05.2021	Currently released version

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