

CONTENTS

Scope 2

Responsible Parties 2

Policy 2

Open and transparent management of personal information 2

Anonymity and pseudonymity 2

Privacy Notice/ Use or disclosure of personal information (as provided in the Learner Handbook) 3

Dealing with unsolicited personal information 4

Notification of the collection of personal information 4

Direct marketing..... 4

Cross-border disclosure of personal information 4

Adoption, use or disclosure of government related identifiers 4

Quality of personal information 5

Security of personal information 5

Breach of Data 5

Access to personal information..... 6

Correction of personal information 6

Appendix..... 7

This policy has been developed to document Baseline Training Pty Ltd approach to ensuring the Privacy of its learners and employees, in line with the Privacy Act (1988) and Australian Privacy Principles (2012).PURPOSE

Baseline Training Pty Ltd is required to collect, use, store and disclose a range of personal information on learners, employees and a range of other stakeholders. Baseline Training Pty Ltd is committed to maintaining the privacy and confidentiality of all learner and personnel records. Baseline Training Pty Ltd complies with the Privacy Act 1988 (C'Wlth)

The Privacy Act 1988 (Privacy Act) is an Australian law which regulates the handling of personal information about individuals.

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

The Privacy Act includes thirteen Australian Privacy Principles (APPs). The APPs set out standards, rights and obligations for the handling, holding, use, accessing and correction of personal information (including sensitive information).

For access to the Australian Governments Department of Education and Training policies and information relating to the collection and use of data please go to:

<https://www.education.gov.au/national-vet-data>

Scope

This policy applies to all learners, clients, employees and contractors.

Responsible Parties

The Compliance Manager is responsible for the control and issuance of this policy.

Policy

Open and transparent management of personal information

- The RTO will publish this policy on its website
- The policy will be included in to RTOs learner handbook, staff handbook and made available on request.

Anonymity and pseudonymity

- Individuals have the option to not identify themselves when dealing with Baseline Training Pty Ltd, for example when requesting information on a course, website enquiries or anonymous complaints/feedback.
- Individuals who wish to undertake nationally recognised training with the Baseline Training Pty Ltd will be required to disclose information of a personal nature as outlined in this policy.

Privacy Notice/ Use or disclosure of personal information (as provided in the Learner Handbook)

Under the Data Provision Requirements 2012 **Baseline Training Pty Ltd** is required to collect personal information about you and to disclose that personal information to the National Centre for Vocational Education Research Ltd (NCVER).

Your personal information (including the personal information contained on this enrolment form and your training activity data) may be used or disclosed by **Baseline Training** for statistical, regulatory and research purposes. **Baseline Training Pty Ltd** may disclose your personal information for these purposes to third parties, including:

- School – if you are a secondary learner undertaking VET, including a school-based apprenticeship or traineeship;
- Employer – if you are enrolled in training paid by your employer;
- Commonwealth and State or Territory government departments and authorised agencies;
- NCVER;
- Organisations conducting learner surveys; and
- Researchers.

Personal information disclosed to NCVER may be used or disclosed for the following purposes:

- Issuing a VET Statement of Attainment or VET Qualification, and populating Authenticated VET Transcripts;
- facilitating statistics and research relating to education, including surveys;
- understanding how the VET market operates, for policy, workforce planning and consumer information; and
- administering VET, including program administration, regulation, monitoring and evaluation.

You may receive an NCVER learner survey which may be administered by an NCVER employee, agent or third-party contractor. You may opt out of the survey at the time of being contacted.

NCVER will collect, hold, use and disclose your personal information in accordance with the Privacy Act 1988 (Cth), the VET Data Policy and all NCVER policies and protocols (including those published on NCVER's website at www.ncver.edu.au).

You may under the Freedom of information Act, apply to access copies of documents held by the department of Education and Training relating to yourself. For more information go to <https://docs.education.gov.au/pages/how-make-freedom-information-foi-request>

Baseline Training Pty Ltd will not disclose any personal or sensitive information to a third party except for the direct provision of training and assessment reporting requirements as stated above, or in emergency and life-threatening situations.

Dealing with unsolicited personal information

- Baseline Training Pty Ltd only collects, uses and stores information which is directly related to the provision of training and assessment (for learners) and information directly related to the employment or engagement of contractors (for employees and contractors).

Information which is received that is not related to training and assessment or employment with Baseline Training Pty Ltd is destroyed in a safe and secure manner.

Notification of the collection of personal information

Learners and employees are notified when information is collected or sourced from third parties. Such notifications are expressed in enrolment forms, assessment tools and other written documents or implied in such circumstances such as workplace observations.

Direct marketing

- Your personal information will never be sold to any marketing company or third party,
- Baseline Training Pty Ltd may use your personal information to market directly to you only for the provision of further training and assessment with Baseline Training Pty Ltd.
- Baseline Training Pty Ltd will only use your information if you have provided consent to use your information for this purpose and you have opted-in to this type of communication

Cross-border disclosure of personal information

- Baseline Training Pty Ltd will not disclose your personal information to any entity outside of Australia unless you have provided your express written consent,
- All records will be kept in Australia.

Adoption, use or disclosure of government related identifiers

- Baseline Training Pty Ltd is required to collect, in some circumstances, government related identifiers. Baseline Training Pty Ltd will not use these identifiers for any reason or purpose except for the explicit reason it is required (e.g. Concession numbers, Tax File Numbers, Drivers Licence Number, etc) and will not use these numbers as an identifier of individuals.
- Training Pty Ltd will only disclose government related identifiers where required by law or express consent has been given to disclose this information

Quality of personal information

- Baseline Training Pty Ltd collects information and ensures it is accurate, up to date and complete,
- Baseline Training Pty Ltd will take all reasonable steps to ensure that the information provided from individuals is correct and any third-party information received can be verified for accuracy, currency and completeness.

Security of personal information

- All personal and sensitive information is kept safe and secure at all times, only people who are authorised may access this information.
- Personal and Sensitive information is protected from unauthorised access, interference, misuse, loss, modification or disclosure.
- Destruction of personal and sensitive information is carried out by commercial document destruction companies or secure shredding or secure electronic deletion and certificate of secure destruction kept on record.

Breach of Data

A data breach is an unauthorised access or disclosure of personal information, or loss of personal information.

Baseline Training uses a cloud based (Amazon) data management system called aXcelerate.

aXcelerate has a multi-tenanted data model which means our database is stored separately but rather separated with a combination of public and private key fields on all primary entities creating virtual partitions between the data in each account.

aXcelerate is delivered over SSL. All data transfer between users and our server is encrypted and our security authenticity is always maintained.

The security of our database is treated with the utmost importance. Our database servers are isolated in a firewall protected datacentre within AWS. Access to these servers is restricted to only a few trusted members of our development team. Access to our web servers is done using a multi-factor authentication (MFA) method with security certificates so none of our developers have any need to know anyone else's passwords.

A similar algorithm is used to store Tax File Numbers for VET FEE-HELP students. aXcelerate does not store any credit card details or other sensitive data within the application.

In the event of any security or data breach, aXcelerate will follow procedures to notify all staff and any/all affected clients immediately. Also, in accordance with Australian Privacy Act 1988 as outlined by the Office of the Australian Information Commissioner (OAIC), any breach that could be classified as a Notifiable Breach will be reported appropriately.

Baseline Training Pty Ltd as part of The Corporate Protection Australia Group (CPA) runs highly sophisticated digital security protocols due to the nature of security work undertaken. In the unlikely

event of a breach, all impacted parties will be notified as part of the organisations Data Breach Response Plan (DBRP) following the steps recommended by the office of the Australian Information Commissioner.

- Step 1 Contain
- Step 2 Assess
- Step 3 Notify
- Step 4 Review

Access to personal information

- Individuals may request copies of information which is kept about them at any time free of charge. Baseline Training Pty Ltd may charge for printing and postage in some circumstances.
- All requests for access to personal information must be in writing and the individual must be able to identify themselves and verify their identity prior to any information being disclosed,
- All requests must be made to:

Baseline Training General Manager
Baseline Training Pty Ltd
Building 7, 231 Holt Street,
Pinkenba QLD 4008

Correction of personal information

- Individuals who feel that the information Baseline Training Pty Ltd uses and stores is inaccurate or incomplete may request to have the information updated and corrected. Such corrections must be in writing

Appendix

The Australian Privacy Principles (APP):

The following APP was downloaded from <http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-17-australian-privacy-principles> on 27th July 2014.

- **APP 1 — Open and transparent management of personal information**
Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.
- **APP 2 — Anonymity and pseudonymity**
Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.
- **APP 3 — Collection of solicited personal information**
Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.
- **APP 4 — Dealing with unsolicited personal information**
Outlines how APP entities must deal with unsolicited personal information.
- **APP 5 — Notification of the collection of personal information**
Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.
- **APP 6 — Use or disclosure of personal information**
Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.
- **APP 7 — Direct marketing**
An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.
- **APP 8 — Cross-border disclosure of personal information**
Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.
- **APP 9 — Adoption, use or disclosure of government related identifiers**
Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier or use or disclose a government related identifier of an individual.
- **APP 10 — Quality of personal information**
An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.
- **APP 11 — Security of personal information**
An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.
- **APP 12 — Access to personal information**
Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.
- **APP 13 — Correction of personal information**
Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.