

Privacy Protection

As a Registered Training Organisation, AIHFE has a responsibility to collect, use and store personal and sensitive information on our students, clients and staff members.

Under the Privacy Act 1988 and the 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 – information or opinion about an individual's:
 - (a) racial or ethnic origin, or nationality
 - (b) indigenous status
 - (c) languages spoken
 - (d) political opinions or membership of a political association
 - (e) religious beliefs, affiliations, or philosophical beliefs
 - (f) membership of a professional or trade association, or a trade union
 - (g) sexual preferences or practices
 - (h) criminal record
 - (i) health such as one's disability or long-term impairment status, and dietary requirements
 - (j) genetics (that is not otherwise health information)
 - (k) biometric (used for the purposes of automated biometric verification or biometric identification)
 - (l) biometric templates

General Privacy Protection Principles

AIHFE does collect, uses and stores personal and sensitive information in compliance with the Privacy Act 1988 (Cth), the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020 and the Standards for Registered Training Organisations 2015, with authority under the National Vocational Education and Training Regulator Act 2011 which is one of the legislative instruments that AIHFE must comply with as a condition of our registration. The data provision requirements require AIHFE to collect personal and sensitive information in accordance with the Australian Vocational Education and Training Management Standard (AVETMISS) and retain and store the information for up to 30 years. The Standards for RTOs 2015 also require AIHFE to report training activity information.

AIHFE collects personal information, either directly or indirectly, that is reasonably necessary for, or directly related to the delivery of our services. Some of the information collected can be regarded as personal and sensitive, such as student contact information – name, organisation, position, address, telephone, and e-mail address, which is used for communication and compulsory reporting purposes; employment-related information such as our staff members' full legal and preferred name, contact numbers, emergency contact details, bank account details, taxation information and superannuation fund and membership details.

AIHFE also collects information relating to student and employer satisfaction surveys to help inform us on our current and future services, practices, systems, policies, procedures and strategies, as well as for complaints and appeals handling purposes.

Privacy Statement

In accordance with Part B, Clause 7.2 of the National VET Data Policy, the Data Requirements 2020 and the Australian Privacy Principles, AIHFE provides a Privacy Statement on our website.

Our Privacy Statement contains:

1. **Collection** – AIHFE will collect only the information necessary for one or more of its functions.
The student will be told the purposes for which the information is collected.
2. **Use and disclosure** – Personal information will not be used or disclosed for a secondary purpose unless the student has consented or a prescribed exception applies.
3. **Data quality** – AIHFE will take all reasonable steps to make sure that the personal information it collects, uses or discloses is accurate, complete and up to date.
4. **Data Security** – AIHFE will take all reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure.
5. **Openness** – AIHFE will document how they manage personal information and when asked by a student, will explain the information it holds, for what purpose and how it collects, holds, uses and discloses the information.
6. **Access and correction** – The student will be given access to the information held except to the extent that prescribed exceptions apply. The AIHFE will correct and update information errors described by the student.
7. **Unique Identifiers** – Commonwealth Government identifiers (e.g. Medicare number or tax file number) will only be used for the purposes for which they were issued. AIHFE will not assign unique identifiers except where it is necessary to carry out its functions efficiently.
8. **Anonymity** – Wherever possible, AIHFE will provide the opportunity for the student to interact with them without identifying themselves.

9. **Transborder Data Flows** – The student's privacy protections apply to the transfer of personal information out of Australia.

10. **Sensitive Information** – AIHFE will seek the consent of the student when collecting sensitive information about the student such as health information, or information about the student's racial or ethnic background, or criminal record.

Data Collection Methods

AIHFE endeavours to notify individuals of the collection of their personal and sensitive information before, or at the time of collection, or as quickly as possible thereafter, such as at enrolment. Notifications are usually made in writing but may be verbal.

AIHFE uses the following avenues to collect information:

- Student and client personal and sensitive information is collected directly from our students and clients using administrative tools such as enrolment forms.
- Student and client personal information such as personal contact information may also be collected at the enquiry stage directly from individuals.
- AIHFE also collects information relating to our performance as an RTO and this information can be collected electronically or in hard copy formats.
- Staff personal and sensitive information is collected from individuals when they come in for an interview and upon commencement of their employment or contractual period with AIHFE.

If AIHFE should receive any unsolicited personal or sensitive information, it will be treated and managed according to the Australian Privacy Principles.

Access, disclosure, and correction of personal information

Learners and third-party individuals or organisations may request access to the personal and sensitive information held by AIHFE where the information has been collected directly from individuals, subject to certain exceptions prescribed by the Australian Privacy Principles. Request for access to the personal and sensitive information should be made in writing. You can refer to our Record Keeping and Access policy for more information on accessing personal information.

AIHFE does not sell or share your personal and sensitive information to third-parties for marketing purposes. We do not disclose any personal and sensitive information other than for the purpose which it was collected for, if an individual has consented to a secondary purpose or would reasonably expect, or if required to by law.

We are obligated to collect and disclose personal information to the National Centre for Vocational Education Research (NCVER), the Australian Skills Quality Authority, as well as any relevant State or

Territory Training or Funding Authority in accordance with any legal or contractual obligations such as funding contracts and reporting obligations. AIHFE will inform and seek consent from the individuals concerned at the point of enrolment.

Under the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020, we are required to collect personal information about you and disclose that personal information to the National Centre for Vocational Education Research (NCVER). NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector. NCVER collects, holds, uses and discloses your personal information in accordance with the law, including the Privacy Act 1988 and the NVETR Act 2011. This information may be used and disclosed by NCVER to the Australian Government department of Education, Skills and Employment (DESE), Commonwealth authorities, State and Territory authorities (other than Registered Training Organisations) that deal with matters relating to VET and VET regulators for the purposes of those bodies, including to enable:

- Populating authenticated VET transcripts;
- Administering vocational education training, including program administration, regulation, monitoring and evaluation;
- Facilitation of statistics and research relating to education, including surveys and data linkage; and
- Understanding the VET market, such as how the VET industry operates, for policy development purposes, workforce planning and consumer data.

NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf and NCVER does not intend to disclose any personal information to any overseas recipients. You can refer to NCVER's Privacy policy [here](#) for more information on how NCVER handles personal information.

NCVER also administers student surveys which may be run by an Australian government department, or an NCVER employee, agent, third-party contractor or another authorised agency, which learners are able to opt-out of when they are contacted. We may also disclose personal information to individuals or organisations for the purposes of our operations, such as to a Compliance Consultant.

Whilst we endeavour to ensure the personal and sensitive information we collect, use or disclose is accurate, current, and complete, we rely on individuals to help us manage the accuracy, currency, and completeness of the information. Where the information has changed or requires updating, AIHFE will update the information held in the Student Management System accordingly.

Management of personal information

Any personal and sensitive information collected is stored on servers in Australia. AIHFE does not retain any personal and sensitive information collected on servers overseas. We take steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure of the information.

AIHFE have systems which is protected from unauthorised access. Data transferred over the internet through AIHFE's website, online learning platform, and the Student Management System is protected by a Secure Socket Level protocol (SSL) and access is generally protected through user log-on and password, and assignment of user access privileges.

All hard copy documents containing personal and sensitive information is to be entered into the Student Management System or the relevant system or register, and the hard copy document shredded and disposed of securely. No personal and sensitive information should be left unsecured or in view of others who are not authorised access.

AIHFE retains personal information for a period of **30-years** when personal information is no longer necessary for our business operations. Where it is lawful to do so, AIHFE will destroy the information by permanently deleting the relevant electronic files.

Individuals are advised to reach out to us should they have any concerns about the way we manage their personal and sensitive information, as well as about our Privacy Statement. They also have the right to make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of their personal information by AIHFE.

Direct Marketing

AIHFE respects an individual's right to not receive any marketing material. We provide an option within communications and on our website for individuals to unsubscribe from receiving any marketing material from us. We conduct our marketing communications and dissemination of service information in accordance with the Australian Privacy Principle 7 – Direct Marketing, the Spam Act 2003, and the Do Not Call Register Act 2006. It is important to note that it is not AIHFE's practice to make any unsolicited calls for the purpose of marketing our products and services.

Google Analytics and Cookies

Google Incorporated provides a web service known as Google Analytics which gives businesses the ability to track and report website traffic, and the tools a business would need to better understand your customers and strategise our future operations. Cookies, which are packets of data that a

computer receives, and then sends back without changing or altering it is stored in a file located in the web browser. Cookies helps our website track our visitors and their activity, and record log-in information.

These cookies are stored on Google's servers in the United States where they are used to generate reports on website activity. Google may transfer this information to third-parties, if required by law, or for information processing on its behalf.

No personal information is recorded, and this data is only used for website management and improvement purposes. It is possible to disable cookies by changing a web browser's settings and to opt-out of Google Analytics. It is important to note that by disabling the Google Analytics function may affect a user's experience on our website.