

Privacy Policy

Purpose

Salford College is committed to maintain the privacy and confidentiality of its personnel and participant records. Salford College complies with the *Privacy Act 1988 including the 13 Australian Privacy Principles (APPs)* as outlined in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

As a component of our risk management practices, Salford College has conducted a Privacy Impact Assessment for all operations. Mitigation actions from this risk assessment have been implemented for the management of privacy risks at each stage of the information lifecycle, including collection, use, disclosure, storage, destruction and de-identification.

Providing an overall framework for our privacy practices, Salford College has developed and implemented this APP Privacy Policy.

Salford College manages personal information in an open and transparent way. This is evident in the implementation of practices, procedures and system we outline in this policy, that ensure our compliance with the APPs and any binding registered APP code, and provide suitable procedures for Salford College personnel to be able to deal with related inquiries and complaints that may be received from time to time.

The following sections of this policy outline how we manage personal information.

Scope

This policy and procedure applies to all students who are enrolled at Salford College. It also applies to training and administration staffs who are involved in its effective implementation.

Definitions

Personal information	<p>Personal information is defined under the Privacy Act as information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <p>(a) whether the information or opinion is true or not, and</p> <p>(b) whether the information or opinion is recorded in a material form or not.</p> <p>Some examples of personal information include names, addresses, phone numbers and email addresses.</p> <p>The definition of personal information only relates to 'natural' persons. It does not extend to other 'legal' persons, such as companies.</p>
Sensitive	Under the Privacy Act, sensitive information is defined as:

information	<p>(a) information or an opinion about an individual's:</p> <ul style="list-style-type: none"> i. racial or ethnic origin ii. political opinions iii. membership of a political association iv. religious beliefs or affiliations v. philosophical beliefs vi. membership of a professional or trade association vii. membership of a trade union viii. sexual orientation or practices, or ix. criminal record <p>that is also personal information; or</p> <p>(b) health information about an individual</p> <p>(c) genetic information about an individual that is not otherwise health information</p> <p>(d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or</p> <p>(e) Biometric templates.</p>
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Policy

Revisions done to NCVET Privacy Policy

NCVER privacy policy

REVISION DATES: Policy created 27/2/2014; Last revised December 2020

Purpose

This policy explains how National Centre for Vocational Education Research Limited (NCVER) staff and contractors manage your personal information.

NCVER is committed to managing personal information in an open and transparent way. Our Privacy Policy explains how the NCVER complies with:

- the Privacy Act 1988 (Privacy Act), including the Australian Privacy Principles (APPs)
- Subdivision B of the National Vocational Education and Training Regulator Act 2011 (NVETR Act)
- Divisions 4 and 5 of the Student Identifiers Act 2014 (SI Act) and the Student Identifiers Regulations
- Part 2 of the Data Provision Requirements 2012
- the National VET Data Policy.

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We only collect the information we need to do our work. We regularly review our processes to make sure the information we collect is protected in the best possible ways.

Other privacy information

We also have privacy notices that explain how we will handle personal information for specific projects:

- National Student Outcomes Survey
- Longitudinal Surveys of Australian Youth (LSAY)
- Survey of Employer Use and Views of the VET System
- In-training Survey.

Personal information we collect and hold

Types of personal information we collect and hold

We collect personal information to produce statistics, undertake research, and to help manage and operate our business.

If you are a VET student, we may collect and hold the following types of personal information about you:

- name, address and contact details (e.g. telephone number and email address)
- personal identifiers (e.g. government related identifiers)
- demographics (e.g. age, gender)
- country of birth, main language spoken at home, Indigenous status, disability status (including types of disability)
- personal characteristics and personal opinions (e.g. date of birth, country of birth, language spoken at home, Indigenous status, disability status (including types of disability), employment information, and income
- education information (e.g. training enrolment and result details)

If you otherwise engage with us (for example, as a researcher, employee in the VET sector and so on) we may collect and hold the following types of personal information about you:

- name, organisation, position, address and contact details (e.g. telephone number and email address)
- dietary requirement for events and biographical information for keynote speakers
- information received as part of a recruitment process if you apply for a position with us (e.g. resumes and referee reports)
- audio and video recordings of you (as part of testing or your involvement in research, and with your consent).

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How we collect and hold personal information

We may collect personal information about you directly from you (either when we approach you or when you contact us) as well as indirectly from third parties, such as from other government agencies and data custodians that make their data available to us.

We may collect your personal information directly from you:

- using surveys
- when you contact us
- when you sign up to our subscription services
- if you work for a registered training organisation and ask for our help with data submissions
- if you request data or other information from us
- if you take part in our research projects
- when you apply for a position with us.

If you are a student, we may also collect your personal information from other organisations, such as:

- from your training provider
- from administrative data sources (e.g. from data collected by state/territory training authorities and Boards of Studies).

We sometimes use third-party providers to help us collect statistics and undertake research on our behalf. These third-party providers are legally bound to meet privacy standards and our expectations. They will also have their own privacy policies, processes and security protections that we review to ensure their approach to privacy reflects our own.

We separate identifiable information, such as names and addresses, from other information as soon as possible. We store this information securely and separately so that our analysts cannot view your name or address with your other information (e.g. age, gender, training activity, level of education or employment status).

Keeping your personal information safe

We take the security of your personal information seriously and take active steps to protect personal information and data from cybercrime, interference, misuse, modification, and unauthorised access or disclosure.

Our information security management system aligns with the requirements of ISO 27001 (Information Security Management System) and ICT systems security recommendations published by the Australian Signals Directorate.

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Generally, NCVET retains personal information for as long as it is required for its business activities, and for as long as we are legally required to retain the information. When personal information is no longer necessary for the business activity it was collected for, and it is legal to do so, NCVET destroys or takes reasonable steps to de-identify the information.

We assess the impact of our activities on your individual privacy by conducting Privacy Impact Assessments, which help us design new processes, manage change, and keep your information safe.

How we use your personal information

We only use your personal information for the purposes for which it was given to us.

If you are a VET student, we may use your personal information:

- To produce statistics and research relating to education. This may involve combining your information with other sources of data to help policy makers and researchers gain a better understanding VET sector dynamics and performance, support critical policy and other decision making, and shed light on evolving VET sector priorities. This is known as data integration
- To understand how the VET market operates
- To invite you to participate in a survey.

If you otherwise engage with us (for example, as a researcher, employee in the VET sector and so on) we may use your personal information:

- To provide you with information or services you have requested from us
- In our recruitment processes
- For consulting with you on our products and services.

Disclosure of your personal information

If we disclose personal information, we do so only as permitted by the NVETR Act, the Privacy Act, and other relevant legal requirements, such as the National VET Data Policy.

We may disclose your personal information where:

- You have agreed
- You would reasonably expect, or have been told, that we may disclose information in a particular circumstance or to a particular person or organisation
- It is required or authorised by law.

The NVETR Act authorises us to disclose information to any of the following bodies for the purposes of that body:

- the Australian Government Department of Education, Skills and Employment
- another Commonwealth authority

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- a State or Territory authority (other than a registered training organisation) that deals with, or has responsibility for, matters relating to vocational education and training
- a VET Regulator.

Further to this, the National VET Data Policy authorises us to share personal information for:

- (a) populating authenticated VET transcripts
- (b) administering VET, including program administration, regulation, monitoring and evaluation
- (c) facilitating statistics and research relating to education, including surveys and data linkage
- (d) understanding how the VET market operates, for policy, workforce planning and consumer information.

The NCVET does not intend to disclose your personal information to any overseas recipients.

Our websites

When you browse our websites (ncver.edu.au, lsay.edu.au, vocadoplus.edu.au, <https://avs.ncver.edu.au>), we collect the following information about your visit:

- your server or IP address (the name or number that uniquely identifies the computer you are using to connect to the internet)
- date and time of your visit
- web pages you accessed.

No personal information is recorded.

We use this information to manage and improve our websites, products and services.

Where there are links on our websites to third party websites, we cannot guarantee the privacy of those sites and are not responsible for the privacy practices of the linked websites.

Web analytic and survey services

Our websites use Google Analytics, Facebook Pixel, Mailchimp, and Hotjar, web analytic services provided by Google Inc, Facebook and Mailchimp (United States) and Hotjar Ltd (Malta). Information about your use of our websites (including your IP address) is transmitted and stored on servers (Google, Facebook and Mailchimp - United States and Hotjar – Malta). Google, Facebook, Mailchimp and Hotjar use this information to compile reports on website activity for us and to provide other services relating to website activity and internet usage. These services have their own privacy policies, which you can access on their websites.

We occasionally use SurveyMonkey for research or for gathering views from users of our products and services. When you enter information for a survey conducted by NCVET using SurveyMonkey, your

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responses are stored on servers (United States). This service has its own privacy policy, which you can access from their website.

Social networking services

We use social networking services such as Facebook, Twitter, LinkedIn, Instagram and YouTube to communicate with the public about our work. When you communicate with us using these services, we may collect your personal information to communicate with you and the public.

The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for these services on their websites.

Anonymity and Pseudonymity

Where possible, we allow individuals to interact with us anonymously or pseudonymously. Examples of situations where it is not possible to offer anonymity include servicing data requests, resolving client support service requests, registrations for events, document delivery requests and HR management.

Access to and correction of personal information

You can ask to access, and correct, personal information we hold about you at any time. Just contact us using the details below. If you would like to correct your information, in the first instance, please contact your registered training organisation (RTO).

Contact us

For all privacy related enquiries, or to request a pdf copy of this policy, please contact our Privacy Officer:

- By telephoning (08) 8230 8414, on Monday to Friday, between the hours of 9.00am and 5.00pm (Adelaide time)
- By completing our online Feedback form
- By emailing us at privacy@ncver.edu.au
- By writing to us at Privacy Officer, NCVER, PO Box 8288, Station Arcade, SA, 5000.

To make a privacy complaint, please refer to our Complaints Policy at: <https://www.ncver.edu.au/complaints-policy>

Australian Privacy Principle 1 – Open and transparent management of personal information

Purposes for information collection, retention, use and disclosure

Salford College retains a record of personal information about all individuals with whom we undertake any form of business activity. Salford College must collect, hold, use and disclose information from our clients and stakeholders for a range of purposes, including but not limited to:

- Providing services to clients;

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- Day-to-day administration of Salford College
- Looking after student's educational, social, cultural and medical wellbeing
- Satisfying Salford College's legal obligations and allow College to discharge its duty of care
- Managing employee and contractor teams;
- Promoting products and services;
- Conducting internal business functions and activities; and
- Requirements of stakeholders.

As a registered training organisation, regulated by the Australian Skills Quality Authority, Salford College is required to collect, hold, use and disclose a wide range of personal and sensitive information on participants in nationally recognised training programs. This information requirement is outlined in the National Vocational Education and Training Regulator Act 2011 and associated legislative instruments. In particular, the legislative instruments:

- Standards for NVR Registered Training Organisations 2012; and
- Data Provision Requirements 2012.
- Education Services for Overseas Students Act 2000 (ESOS) as amended

It is noted that Salford College is also bound by various State Government Acts requiring similar information collection, use and disclosure (particularly Education Act(s), Vocational Education & Training Act(s) and Traineeship & Apprenticeships Act(s) relevant to state jurisdictions of Salford College operations).

It is further noted that, aligned with these legislative requirements, Salford College may deliver services through a range of Commonwealth and State Government funding contract agreement arrangements, which also include various information collection and disclosure requirements.

Individuals are advised that due to these legal requirements, Salford College discloses information held on individuals for valid purposes to a range of entities including:

- Governments (Commonwealth, State or Local);
- Australian Apprenticeships Centres;
- Employers (and their representatives), Job Network Providers, Schools, Guardians; and
- Service providers such as credit agencies and background check providers.

Kinds of personal information collected and held

The following types of personal information are generally collected, depending on the need for service delivery:

- Contact details;
- Employment details;
- Educational background;
- Demographic Information;
- Course progress and achievement information; and
- Financial billing information.

The following types of sensitive information may also be collected and held:

- Identity details;
- Employee details & HR information;
- Complaint or issue(dispute) information;
- Medical certificates
- Course progress and intervention records
- Disability status & other individual needs;
- Indigenous status; and
- Background checks (such as National Criminal Checks or Working with Children checks).

How personal information is collected

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Salford College’s usual approach to collect personal information is to gather any required information directly from the individuals concerned. This may include the use of forms (such as registration forms, enrolment forms or service delivery records), the use of web-based systems (such as online enquiry forms, web portals or internal operating systems), face –to face meetings and interviews, emails and telephone calls.

Salford College does receive solicited and unsolicited information from third party sources in undertaking service delivery activities. This may include information from such as:

- Parents or guardians
- Governments (Commonwealth, State or Local).
- Australian Apprenticeships Centres;
- Employers (and their representatives), Job Network Providers, Schools, Guardians; and
- Service providers such as credit agencies and background check providers.

How personal information is held

Salford College’s usual approach to holding personal information includes robust storage and security measures at all times. Information on collection is:

- As soon as practicable converted to electronic means;
- Stored in secure, password protected systems, such as financial system, learning management system and student management system; and
- Monitored for appropriate authorised use at all times.

Only authorised personnel are provided with login information to each system, with system access limited to only those relevant to their specific role. Salford College systems are hosted internally with robust internal security to physical server locations and server systems access. Virus protection, backup procedures and ongoing access monitoring procedures are in place.

Destruction of paper based records occurs as soon as practicable in every matter, through the use of secure shredding and destruction services at Salford College sites.

Individual information held across systems is linked through Salford College allocated identification number for each individual.

Retention and Destruction of Information

Salford College maintains a Retention and Disposal Schedule documenting the periods for which personal information records are kept.

Specifically for our RTO records, in the event of our organisation ceasing to operate the required personal information on record for individuals undertaking nationally recognised training with us would be transferred to the Australian Skills Quality Authority, as required by law.

Accessing and seeking correction of personal information

Salford College confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to make contact with:

Salford College Privacy Officer

08-7221 1940

info@salfordcollege.edu.au

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A number of third parties, other than the individual, may request access to an individual's personal information. Such third parties may include employers, parents or guardians, schools, Australian Apprenticeships Centres, Governments (Commonwealth, State or Local) and various other stakeholders.

In all cases where access is requested, Salford College will ensure that:

- Parties requesting access to personal information are robustly identified and vetted;
- Where legally possible, the individual to whom the information relates will be contacted to confirm consent (if consent not previously provided for the matter); and
- Only appropriately authorised parties, for valid purposes, will be provided access to the information.

Complaints about a breach of the APPs or a binding registered APP code

If an individual feel that SALFORD COLLEGE may have breached one of the APPs or a binding registered APP Privacy Complaints Procedure below for further information.

Likely overseas disclosures

Salford College confirms that individuals' personal information is likely to be disclosed to overseas recipients, for internal business activity purposes. Likely overseas recipients include:

- Salford College Registered education agents
- Salford College debt collection agencies
- 'CLOUD' service provider
- An organisation for exchange programs

Any type of personal information held by Salford College (as listed above) may be included in these disclosures.

Making our APP Privacy Policy available

Salford College provides our APP Privacy Policy available free of charge, with all information being publicly available from the Privacy link on our website at www.salfordcollege.edu.au. In addition, this APP Privacy Policy is:

- Prominently displayed at Salford College premises;
- Noted within the text or instructions at all information collection points (such as informing individuals during a telephone call of how the policy may be accessed, in cases where information collection is occurring); and
- Available for distribution free of charge on request, as soon as possible after the request is received, including in any particular format requested by the individual as is reasonably practical.

If, in the unlikely event the APP Privacy Policy is not able to be provided in a particular format requested by an individual, we will explain the circumstances around this issue with the requester and seek to ensure that another appropriate method is provided.

Review and Update of this APP Privacy Policy

Salford College reviews this APP Privacy Policy:

- On an ongoing basis, as suggestions or issues are raised and addressed, or as government required changes are identified;
- Through our internal audit processes on at least an annual basis;
- As a part of any external audit of our operations that may be conducted by various government agencies as a part of our registration as an RTO or in normal business activities; and
- As a component of each and every complaint investigation process where the complaint is related to a privacy matter.

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Where this policy is updated, changes to the policy are widely communicated to stakeholders through internal personnel communications, meetings, training and documentation, and externally through publishing of the policy on Salford College website and other relevant documentation (such as our Handbook) for clients.

Australian Privacy Principle 2 – Anonymity and pseudonymity

SALFORD COLLEGE provides individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us in relation to a particular matter, whenever practical. This includes providing options for anonymous dealings in cases of general course enquiries or other situations in which an individuals' information is not required to complete a request.

Individuals may deal with us by using a name, term or descriptor that is different to the individual's actual name wherever possible. This includes using generic email addresses that does not contain an individual's actual name or generic user names when individuals may access a public component of our website or enquiry forms.

Salford College only stores and links pseudonyms to individual personal information in cases where this is required for service delivery (such as system login information) or once the individual's consent has been received.

Individuals are advised of their opportunity to deal anonymously or by pseudonym with us where these options are possible.

Requiring identification

Salford College must require and confirm identification however in-service delivery to individuals for nationally recognised course programs. We are authorised by Australian law to deal only with individuals who have appropriately identified themselves. That is, it is a Condition of Registration for all RTOs under the National Vocational Education and Training Regulator Act 2011 that we identify individuals and their specific individual needs on commencement of service delivery, and collect and disclose Australian Vocational Education and Training Management of Information Statistical Standard (AVETMISS) data on all individuals enrolled in nationally recognised training programs. Other legal requirements, as noted earlier in this policy, also require considerable identification arrangements.

There are also other occasions within our service delivery where an individual may not have the option of dealing anonymously or by pseudonym, as identification is practically required for us to effectively support an individual's request or need.

Australian Privacy Principle 3 — Collection of solicited personal information

Salford College only collects personal information that is reasonably necessary for our business activities.

We only collect sensitive information in cases where the individual consents to the sensitive information being collected, except in cases where we are required to collect this information by law, such as outlined earlier in this policy.

All information we collect is collected only by lawful and fair means.

We only collect solicited information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner.

Australian Privacy Principle 4 – Dealing with unsolicited personal information

Salford College may from time to time receive unsolicited personal information. Where this occurs we promptly review the information to decide whether or not we could have collected the information for the purpose of our business activities. Where this is the case, we may hold, use and disclose the information appropriately as per the practices outlined in this policy.

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Where we could not have collected this information (by law or for a valid business purpose) we immediately destroy or de-identify the information (unless it would be unlawful to do so).

Australian Privacy Principle 5 – Notification of the collection of personal information

Whenever Salford College collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.

Our notifications to individuals on data collection include:

- Salford College identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters;
- The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party;
- If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection;
- The purpose of collection, including any primary and secondary purposes;
- The consequences for the individual if all or some personal information is not collected;
- Other organisations or persons to which the information is usually disclosed, including naming those parties;
- Whether we are likely to disclose the personal information to overseas recipients, and if so, the names of the recipients and the countries in which such recipients are located.
- A link to this APP Privacy Policy on our website or explain how it may be accessed; and
- Advice that this APP Privacy Policy contains information about how the individual may access and seek correction of the personal information held by us; and how to complain about a breach of the APPs, or any registered APP code, and how we will deal with such a complaint.

Where possible, we ensure that the individual confirms their understanding of these details, such as through signed declarations, website form acceptance of details or in person through questioning.

Collection from third parties

Where Salford College collects personal information from another organisation, we:

1. Confirm whether the other organisation has provided the relevant notice above to the individual; or
2. Whether the individual was otherwise aware of these details at the time of collection; and
3. If this has not occurred, we will undertake this notice to ensure the individual is fully informed of the information collection.

Australian Privacy Principle 6 – Use or disclosure of personal information

Salford College only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected, or secondary purposes in cases where:

- An individual consented to a secondary use or disclosure;
- An individual would reasonably expect the secondary use or disclosure, and that is directly related to the primary purpose of collection; or
- Using or disclosing the information is required or authorised by law.

Requirement to make a written note of use or disclosure for this secondary purpose

If Salford College uses or discloses personal information in accordance with an ‘enforcement related activity’ we will make a written note of the use or disclosure, including the following details:

- The date of the use or disclosure;
- Details of the personal information that was used or disclosed;
- The enforcement body conducting the enforcement related activity;

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- If the organisation used the information, how the information was used by the organisation;
- The basis for our reasonable belief that we were required to disclose the information.

Australian Privacy Principle 7 – Direct marketing

Salford College does not use or disclose the personal information that it holds about an individual for the purpose of direct marketing, unless:

- The personal information has been collected directly from an individual, and the individual would reasonably expect their personal information to be used for the purpose of direct marketing; or
- The personal information has been collected from a third party, or from the individual directly, but the individual does not have a reasonable expectation that their personal information will be used for the purpose of direct marketing; and
- We provide a simple method for the individual to request not to receive direct marketing communications (also known as ‘opting out’).

On each of our direct marketing communications, Salford College provides a prominent statement that the individual may request to opt out of future communications, and how to do so.

An individual may also request us at any stage not to use or disclose their personal information for the purpose of direct marketing, or to facilitate direct marketing by other organisations. We comply with any request by an individual promptly and undertake any required actions for free.

We also, on request, notify an individual of our source of their personal information used or disclosed for the purpose of direct marketing unless it is unreasonable or impracticable to do so.

Australian Privacy Principle 8 – Cross-border disclosure of personal information

Before Salford College discloses personal information about an individual to any overseas recipient, we undertake reasonable steps to ensure that the recipient does not breach any privacy matters in relation to that information.

Australian Privacy Principle 9 – Adoption, use or disclosure of government related identifiers

Salford College does not adopt, use or disclose a government related identifier related to an individual except:

- In situations required by Australian law or other legal requirements;
- Where reasonably necessary to verify the identity of the individual;
- Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority; or
- As prescribed by regulations.

Australian Privacy Principle 10 – Quality of personal information

Salford College takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. We also take reasonable steps to ensure that the personal information we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant. This is particularly important where:

- When we initially collect the personal information; and
- When we use or disclose personal information.

We take steps to ensure personal information is factually correct. In cases of an opinion, we ensure information takes into account competing facts and views and makes an informed assessment, providing it is clear this is an opinion. Information is confirmed up to date at the point in time to which the personal information relates.

Quality measures in place supporting these requirements include:

- Internal practices, procedures and systems to audit, monitor, identify and correct poor quality personal information (including training staff in these practices, procedures and systems);
- Protocols that ensure personal information is collected and recorded in a consistent format, from a primary information source when possible;

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- Ensuring updated or new personal information is promptly added to relevant existing records;
- Providing individuals with a simple means to review and update their information on an on-going basis through our online portal;
- Reminding individuals to update their personal information at critical service delivery points when we engage with the individual;
- Contacting individuals to verify the quality of personal information where appropriate when it is about to be used or disclosed, particularly if there has been a lengthy period since collection; and
- Checking that a third party, from whom personal information is collected, has implemented appropriate data quality practices, procedures and systems.

Australian Privacy Principle 11 — Security of personal information

Salford College takes active measures to consider whether we are able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference, and loss, as well as unauthorised access, modification or disclosure.

We destroy or de-identify personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.

Access to Salford College offices and work areas is limited to our personnel only - visitors to our premises must be authorised by relevant personnel and are always accompanied. With regard to any information in a paper-based form, we maintain storage of records in an appropriately secure place to which only authorised individuals have access.

Regular staff training and information bulletins are conducted with Salford College personnel on privacy issues, and how the APPs apply to our practices, procedures, and systems. Training is also included in our personnel induction practices.

We conduct ongoing internal audits (at least annually and as needed) of the adequacy and currency of security and access practices, procedures and systems implemented.

Australian Privacy Principle 12 — Access to personal information

Where Salford College holds personal information about an individual, we provide that individual access to the information on their request. In processing requests, we:

- Ensure through confirmation of identity that the request is made by the individual concerned, or by another person who is authorised to make a request on their behalf;
- Respond to a request for access:
 - Within 10 working days, when notifying our refusal to give access, including providing reasons for refusal in writing, and the complaint mechanisms available to the individual; or
 - Within 20 working days, by giving access to the personal information that is requested in the manner in which it was requested.
- Provide information access free of charge.

Australian Privacy Principle 13 – Correction of personal information

Salford College takes reasonable steps to correct personal information we hold, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

Individual Requests

On an individual’s request, we:

- Correct personal information held; and
- Notify any third parties of corrections made to personal information, if this information was previously provided to these parties.

In cases where we refuse to update personal information, we:

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- Give a written notice to the individual, including the reasons for the refusal and the complaint mechanisms available to the individual;
- Upon request by the individual whose correction request has been refused, take reasonable steps to associate a statement with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading;
- Respond within 10 working days to these requests; and
- Complete all actions free of charge.

Correcting at Salford College initiative

We take reasonable steps to correct personal information we hold in cases where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading (that is, the information is faulty). This awareness may occur through collection of updated information, in notification from third parties or through other means.

Request for Records Access’ Procedure

Individuals or third parties may at any stage request access to records held by Salford College relating to their personal information. The following procedure is followed on each individual request for access:

1. A request for access is provided by the requester, with suitable information provided to be able to:
 - a. Identify the individual concerned;
 - b. Confirm their identity; and
 - c. Identify the specific information that they are requesting access to.

This request may be in any form, or preferably using Salford College Records Access or Update Request Form.

2. Upon receiving a request for access, Salford College then:
 - a. Confirms the identity of the individual or party requesting access;
 - b. Confirms that this individual or party is appropriately authorised to receive the information requested;
 - c. Searches the records that we possess or control to assess whether the requested personal information is contained in those records; and
 - d. Collates any personal information found ready for access to be provided.

Confirming identity

Salford College personnel must be satisfied that a request for personal information is made by the individual concerned, or by another person who is authorised to make a request on their behalf. The minimum amount of personal information needed to establish an individual’s identity is sought, which is generally an individual’s name, date of birth, last known address and signature.

When meeting the requesting party in person, identification may be sighted.

If confirming details over a telephone conversation, questions regarding the individual’s name, date of birth, last known address or service details may be confirmed before information is provided.

3. Once identity and access authorisation is confirmed, and personal information is collated, access is provided to the requester within 20 working days of receipt of the original request. We will provide access to personal information in the specific manner or format requested by the individual, wherever it is reasonable and practicable to do so, free of charge.

Where the requested format is not practical, we consult with the requester to ensure a format is provided that meets the requester’s needs.

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4. If the identity or authorisation access cannot be confirmed, or there is another valid reason why Salford College is unable to provide the personal information, refusal to provide access to records will be provided to the requester, in writing. Our notification will include reason(s) for the refusal, and the complaint mechanisms available to the individual. Such notifications are provided to the requester within 20 working days of receipt of the original request.

‘Request for Records Update’ Procedure

Individuals or third parties may at any stage request that their records held by Salford College relating to their personal information be updated. The following procedure is followed on each individual request for records updates:

1. A request for records update is provided by the requester, with suitable information provided to be able to:
 - a. Identify the individual concerned;
 - b. Confirm their identity; and
 - c. Identify the specific information that they are requesting be updated on their records.

This request may be in any form, or preferably using Salford College Records Access or Update Request Form.

2. Upon receiving a request for records update, Salford College then:
 - a. Confirms the identity of the individual or party to whom the record relates;
 - b. Searches the records that we possess or control to assess whether the requested personal information is contained in those records; and
 - c. Assesses the information already on record, and the requested update, to determine whether the requested update should proceed.

Assessing Update

Salford College personnel assess the relevant personal information we hold, and the requested updated information, to determine which version of the information is considered accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.

This may include checking information against other records held by us, or within government databases, in order to complete an assessment of the correct version of the information to be used.

3. Once identity and information assessment is confirmed, personal information is:
 - a. Updated, free of charge, within 10 working days of receipt of the original request: and
 - b. Notified to any third parties of corrections made to personal information if this information was previously provided to these parties.
4. If the identity of the individual cannot be confirmed, or there is another valid reason why Salford College is unable to update the personal information, refusal to update records will be provided to the requester in writing, free of charge, within 10 working days.

Our notification will include the reasons for the refusal and the complaint mechanisms available to the individual.

5. Upon request by the individual whose correction request has been refused, we will also take reasonable steps to associate a ‘statement’ with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading. This statement will be applied, free of charge, to all personal information relevant across Salford College systems within 20 working days of receipt of the statement request.

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Privacy Complaints Procedure

If an individual feel that Salford College has breached its obligations in the handling, use or disclosure of their personal information, they may raise a complaint. We encourage individuals to discuss the situation with their Salford College representative in the first instance, before making a complaint.

The complaints handling process is as follows:

1. The individual should make the complaint including as much detail about the issue as possible, in writing to Salford College:

Salford College Privacy Officer

Email: info@salfordcollege.edu.au

Level 11, 68 Grenfell Street Adelaide SA-5000

2. SALFORD COLLEGE will investigate the circumstances included in the complaint and respond to the individual as soon as possible (and within 20 working days) regarding its findings and actions following this investigation.

3. Should after considering this response, if the individual is still not satisfied, they make escalate their complaint directly to the Information Commissioner for investigation:

Office of the Australian Information Commissioner

www.oaic.gov.au

Phone: 1300 363 992

When investigating a complaint, the OAIC will initially attempt to conciliate the complaint, before considering the exercise of other complaint resolution powers.

4. Alternatively, if the complaint relates to a non-privacy matter, or should individuals choose to do so, a complaint may also be lodged with the ASQA complaints handing service for complaints against RTOs:

Australian Skills Quality Authority Phone: 1300 701 801 www.asqa.gov.au

Notifiable Data Breach

In the event of a potential breach incident Salford College will ensure:

- The potential breach incident to be assessed
- All individuals affected will be notified about the breach within 30 days if there is suspicion of serious harm
- Individuals affected will be advised about what steps they should take in response
- If after the assessment it is determined that a Notifiable Data Breach has occurred, this will be reported to the Australian Information Commissioner

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