

Training Evolution is committed to maintaining the privacy and confidentiality of our RTO personnel and participant records. Training Evolution 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, Training Evolution 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, Training Evolution has developed and implemented this APP Privacy Policy.

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

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

## Australian Privacy Principle 1 – Open and Transparent Management of Personal Information

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

- ① Providing services to clients;
- ① Managing employee and contractor teams;
- ① Promoting products and services;
- ① Conducting internal business functions and activities; and
- ① Requirements of stakeholders.

As a Government Registered Training Organisation, regulated by the Australian Skill Quality Authority (ASQA), Training Evolution 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:

- ① Student Identifiers Act 2014;
- ① Standards for Registered Training Organisations (RTOs) 2015; and
- ① Data Provision Requirements 2012.

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

It is further noted that aligned with these legislative requirements, Training Evolution delivers 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, Training Evolution discloses information held on individuals for valid purposes to a range of entities including:

- ① Governments (Commonwealth, State or Local);
- ① Australian Apprenticeship Support Network (AASN);
- ① Employers (and their representatives), Job Network providers, schools, guardians; and
- ① 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 deliver:

- ① Contact details;
- ① Employment details;
- ① Educational background;
- ① Demographic information;
- ① Course progress and achievement information; and
- ① Financial billing information.

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

- ① Identity details;
- ① Employee details and HR information;
- ① Complaint or issue information;
- ① Disability status and other individual needs;
- ① Indigenous status; and
- ① Background checks (such as National Criminal Checks or Working with Children checks).

Where Training Evolution collects personal information of more vulnerable segments of the community (such as children), additional practices and procedures are also followed. Please refer to Training Evolution Working with Children Policy and Procedure for further information.

## How Personal Information is Collected

Training Evolution's usual approach to collecting personal information is to collect 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) and the use of web-based systems (such as online enquiry forms, web portals or internal operating systems).

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

- ① Governments (Commonwealth, State or Local);
- ① Australian Apprenticeship Support Network (AASN);
- ① Employers (and their representatives), Job Network providers, schools, guardians; and
- ① Service providers such as credit agencies and background check providers.

## How Personal Information Is Held

Training Evolution's usual approach to holding personal information includes robust storage and security measures at all times. Information on collection is:

- ① As soon as practical converted to electronic means;
- ① Stored in secure, password protected systems, such as financial systems, learning management systems and student management systems; and
- ① 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. Training Evolution's IT systems are hosted internally with robust internal security to physical server locations and server system 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 all Training Evolution sites.

Individual information held across systems is linked through a Training Evolution allocated identification number for each individual.

## Retention and Destruction of Information

Training Evolution maintains a retention and disposal schedule, documenting the periods of which personal information records are kept. Specifically, for our RTO records, in the event of our organisation ceasing to operate the required person information on record for individuals undertaking nationally recognised training with us would be transferred to ASQA, as required by law.

## Accessing and Seeking Correction of Personal Information

Training Evolution 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 Training Evolution's Privacy Officer on 07 5667 7224 or [learnmore@pst.edu.au](mailto:learnmore@pst.edu.au).

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, AASNs, Governments (Commonwealth, State or Local) and various other stakeholders.

In all cases where access is requested, Training Evolution 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 has not been 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 feels that Training Evolution may have breached one of the APPs or a binding registered APP, follow the Privacy Complaints Procedure.

APP Privacy any type of personal information held by Training Evolution (as listed above) may be included in these disclosures.

## Making Our APP Privacy Policy Available

Training Evolution provides our policy, free of charge, with all information being publicly available from the website. This website information is designed to be accessible as per web publishing accessibility guidelines, to ensure access is available to individuals with special needs (such as individuals with a vision impairment).