

PURPOSE

Skills Strategies International is committed to protecting the privacy of your personal information. This policy outlines how we handle your personal information and comply with:

- [Standards for Registered Training Organisations \(RTOs\) 2015](#)
- [Privacy Act 1988, Australian Privacy Principles \(APPs\)](#)
- [National Vocational Education and Training Regulator \(Data Provision Requirements\) Instrument 2020](#)
- [National VET Data Policy](#)

This policy explains how we collect, use, disclose and otherwise handle personal information relating to learners. It also explains how learners can ask to access and correct the personal information we hold about them or complain about any suspected privacy breach.

SCOPE

This policy applies to all Skills Strategies International employees and third party partners.

VERSION

Version	Date	Update Details	Author	Approved
1.0	Jun 2019	Created.	Quality Manager	S. Robinson
2.0	Mar 2020	Reviewed and updated details and format.	C. Damer	S. Robinson
2.1	Mar 2022	Annual internal audit, review and update.	C. Damer	M. Robertson

POLICY

Compliance

Skills Strategies International protects the privacy of your personal information by reviewing, implementing and maintaining policies, procedures and systems that comply with:

- Privacy Act 1988
- Australian Privacy Principles (APPs)
- Standards for RTOs 2015, Clause 4.1 – Provide accurate and accessible information to prospective and current students
- Standards for RTOs 2015, Clauses 5.1 to 5.3 – Informing and protecting students
- Standards for RTOs 2015, Clause 8.5
- Data Provision Requirements 2012
- National VET Data Policy
- Privacy Notice at Schedule 1

These policies, procedures and systems include:

- Complaints and Appeals Policy
- Complaints and Appeals Procedure
- Enrolment Procedure
- Marketing and Advertising Procedure
- Records Management Procedure
- Risk Management Procedure
- VET in Schools Data Procedure

Collection and Notification

We are required to collect personal information only by lawful and fair means. Where possible, we will collect personal information directly from you, the learner or client.

We may collect personal information through the following means:

- From you directly, including written and verbal communications
- Course enrolment forms
- Third parties with whom we partner with
- Other training information where we are required to do so by law

Where we collect personal information, we take reasonable steps to notify you of:

- The purposes for which we are collecting the information
- The third parties to whom we may disclose the information of that kind
- How to access and correct personal information and make privacy complaints

We will only collect sensitive information where it is reasonably necessary for our core functions or activities as a training provider. For example, we may collect:

- Information about employment status for appropriate allocation of course fees
- Information about dietary requirements for training catering
- Identification as Aboriginal or Torres Strait Islander for enrolment into qualifications that are on our scope of registration

Where it is practical and lawful for us to do so, we will enable you to access our website and make general telephone enquiries without having to identify yourself or by using a pseudonym.

Use and Disclosure

Personal information may be used by us to:

- Provide you with quality training and assessment services
- Collect payments and to administer your accounts
- Maintain and update our student management systems

National VET Data Policy

The National VET Data Policy (the Policy) brings together requirements for collecting nationally consistent data about VET activity and processes, and for using data in statistical collections and national surveys.

The [Privacy Notice](#) explains how personal information provided by you may be collected, held, used or disclosed, together with training activity information. It also assists to establish a student's expectations of how their personal information and training data may be handled.

Privacy Notice

Why we collect your personal information

As a Registered Training Organisation (RTO), we collect your personal information so we can process and manage your enrolment in a vocational education and training (VET) course with us.

If you do not provide this personal information, it may impact on your enrolment in your course.

How we use your personal information

We use your personal information to enable us to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO.

How we disclose your personal information

We are required by law, under the *National Vocational Education and Training Regulator Act 2011 (Cth)* (NVETR Act), to disclose the personal information we collect about you to the National VET Data Collection kept by the National Centre for Vocational Education Research Ltd (NCVER). The NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector.

We are also authorised by law (under the NVETR Act) to disclose your personal information to the relevant state or territory training authority.

How the NCVER and other bodies handle your personal information

The NCVER will collect, hold, use and disclose your personal information in accordance with the law, including the *Privacy Act 1988 (Cth)* (Privacy Act) and the NVETR Act. Your personal information may be used and disclosed by NCVER for purposes that include populating authenticated VET transcripts; administration of VET; facilitation of statistics and research relating to education, including surveys and data linkage; and understanding the VET market.

The NCVER is authorised to disclose information 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:

- administration of VET, including program administration, regulation, monitoring and evaluation
- facilitation of statistics and research relating to education, including surveys and data linkage
- understanding how the VET market operates, for policy, workforce planning and consumer information.

The NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf. The NCVER does not intend to disclose your personal information to any overseas recipients.

For more information about how the NCVER will handle your personal information please refer to the NCVER's Privacy Policy at www.ncver.edu.au/privacy.

If you would like to seek access to, or correct, your information, in the first instance, please contact us using the contact details listed below.

DESE is authorised by law, including the Privacy Act and the NVETR Act, to collect, use and disclose your personal information to fulfil specified functions and activities. For more information about how the DESE will handle your personal information, please refer to the DESE VET Privacy Notice at <https://www.desegov.au/national-vet-data/vet-privacy-notice>.

Surveys

You may receive a student survey which may be run by a government department or an NCVER employee, agent, third-party contractor or another authorised agency. Please note you may opt out of the survey at the time of being contacted.

Contact information

At any time, you may contact Skills Strategies International to:

- Request access to your personal information
- Correct your personal information
- Make a complaint about how your personal information has been handled
- Ask a question about this Privacy Notice

For contact details [click here](#).

Marketing and Advertising

We may at times take photos and videos of learners and clients participating in our courses and events. These photos and videos may be used for marketing purposes.

It is a requirement of the *Standards for RTOs 2015, Clause 4.1 – Provide accurate and accessible information to prospective and current students*, that we gain written consent from the individual or organisation for the inclusion of any photos, videos, testimonials or other items in our marketing materials. Written consent is obtained through the completion of either the following:

- [Media Consent Form](#)
- [Media Consent Form*](#)

All efforts are made to ensure that no individual or organisation is identified by name in any media or other publication without the expressed consent of the student and/or parent/guardian. Any individual or organisation is able to request no media coverage by completing one of the above documents or writing to us directly.

We may provide you with updated or new information about our training products and services from time to time. If you do not wish to receive this information you may decline at any time by contacting our office on the contact details provided at the end of this policy.

Access and Correction

You can access your personal information that we hold with some exceptions as allowed by law. To obtain a copy of your personal information please write to Skills Strategies International requesting the information. We will assess your request and provide you with a response within 10 working days. We reserve the right to charge a reasonable fee for the provision of this information.

If we refuse a request, or if we refuse to give access in the manner requested, it is Skills Strategies International policy to provide you with written confirmation of the reasons for our refusal and the available complaint process.

Prior to accessing your personal information, verified identification and USI is required. Any incorrect information will be corrected immediately.

If you have any queries, or you wish to access or correct the personal information held by Skills Strategies International, please contact our office on the contact details provided at the end of this policy.

Complaints

If you have a complaint about how we have handled your personal information, please contact our office on the contact details provided at the end of this policy.

We will address your complaint and take any steps necessary to resolve the matter within 10 business days. If your complaint is unable to be resolved within 10 business days, we will advise you in writing including letting you know when we expect to provide our response.

Disputes with our response can be referred to the [Office of the Australian Information Commissioner](#).

For more information please refer to our [Complaints and Appeals Policy](#).

Monitoring and Improvement

We monitor and improve this policy as part of our quality management system outlined in the following:

- [Continuous Improvement Procedure](#)
- [Internal Audit Procedure](#)
- [Records Management Procedure](#)

For all identified opportunities for improvement, please submit a [Continuous Improvement Request](#).

Contact Details

Head Office

Address: 5/199 Balcatta Road, Balcatta WA 6021

Phone: (08) 6143 2180

Email: info@skillstrategies.edu.au

TERMS AND DEFINITIONS

Australian Privacy Principles (APPs)	The 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.
Australian Skills Quality Authority (ASQA)	The national regulator for Australia's vocational education and training sector.
National Centre for Vocational Education Research (NCVER)	An Australian non-profit that promotes research on the vocational education and training sector in Australia, and acts as a funding body for research in that field.
National VET Data Policy	Brings together requirements for collecting nationally consistent data about VET activity and processes, and for using data in statistical collections and national surveys. The December 2020 National VET Data Policy is a revised policy that came into effect from 1 January 2021.
Registered Training Organisation (RTO)	A training provider registered by ASQA (or a state regulator) to deliver VET services.
Skills Strategies International (SSI)	Your Registered Training Organisation (RTO) delivering you quality training and services.
Third Party	Any party that provides services on behalf of the RTO.
Vocational Education and Training (VET)	Formal, accredited post compulsory education designed to develop knowledge, skills and attributes of a vocational nature. Training is provided by registered training organisations.

RELATED DOCUMENTS

Internal

Policies

Complaints and Appeals
Compliance Reporting
Data Storage
Email and Messaging
Information Technology
Office Access and Security
Password

Procedures

Complaints and Appeals
Enrolment
Marketing and Advertising
Records Management
VET in School Data

Templates

Continuous Improvement Request
Media Consent Form
Media Consent Form*

Systems and Resources

Compliance Matrix
Learner Handbook
Privacy Notice

* *Online/digital documents*

External

Standards for RTOs 2015, Clause 4.1 – Provide accurate and accessible information to prospective and current students
Standards for RTOs 2015, Clauses 5.1 to 5.3 – Informing and protecting students
Standards for RTOs 2015, Clause 8.5
Australian Privacy Principles (APPs)
Data Provision Requirements 2020
National VET Data Policy
Privacy Act 1988