

POL016_Student Privacy Policy

Table of Contents

1. Scope	3
2. Purpose.....	3
3. Types of Information Collected	4
4. How Information is Collected.....	4
Surveys:	4
Anonymity:.....	5
5. Why We Collect Information	5
Requiring Identification:.....	5
6. Disclosure of Information	6
How we use and disclose the personal information.....	6
7. Storage and Security of the Collected Information	7
8. Access & Correction of the Personal Information	7
9. Enquires & Complaints regarding the Privacy Policy	8
10. Review and update of the Privacy Policy	8
Associated Documents.....	9
Appendix.....	9
Definitions:.....	9
Schedule 1:	9

1. Scope

Danford College is committed to providing quality education and services to all the enrolled and potential students. The Privacy policy clearly defines Danford College's obligations in collecting and maintain the information provided by our students.

The policy is in accordance with:

- ESOS National Code 2018: Standard 3 (3.5, 3.3.6)
- ESOS ACT 2000
- The Australian Privacy Principles (APPs) contained in the Privacy Act <https://www.oaic.gov.au/privacy/australian-privacy-principles>

The Privacy Policy applies to all the students enrolled at Danford College, prospective students, education agents, relevant Danford Staff including but not limited to marketing department, admissions department, academic department, student support team, finance department and compliance department.

The Privacy Policy is publicly available on Danford College website www.danford.edu.au and a privacy statement can be found in the Students' Handbook, Offer Letter and relevant policies.

2. Purpose

Danford College in accordance with the Australian Privacy Principles has a commitment to ensuring that all reasonable steps are taken to protect the privacy of the information provided by the students. The Privacy Policy aims to achieve the following objectives:

- Outline details of what information is collected
- Outline how information is collected and stored securely
- Disclosure of the information collected
- Outline how the students can access the provided information.

3. Types of Information Collected

Danford College collects and stores a variety of personal information throughout the student lifecycle

Information collected from the student can include but is not limited to the following:

1. Certain personal information including name, date of birth, gender, residential address, email address, phone number, country of birth, nationality, passport number, Indigenous status, Gender, Marital Status, Contact details, Passport Details, Emergency Contact Details, Unique Student Identifier (USI), and course details;
2. Language, literacy & numeracy assessments, English Language Test Results
3. Previous qualification details
4. Details of any disability or health issue that may affect the student's ability to undertake training and/or assessment activities,
5. Employment history / status, Schooling / qualifications completed, Verification documentation and evidence, Citizenship, Residency and Visa status and information,

4. How Information is Collected

The information is collected from the data entered by the students directly or the education agents via enrolment forms, surveys or other relevant platforms. Information is collected on enrolment form is to meet Danford College's obligations under the ESOS Act and the National Code 2018; to ensure student compliance with the conditions of students Visas and their obligations under Australian immigration laws generally. The types of information collected or disclosed by the student will vary depending on the method of collection, the purpose of that collection and the individual disclosing the information.

Students may disclose other relevant information like change of personal details by completing the relevant forms electronically. Written consent is obtained prior to collection of personal information through the relevant forms.

Prior to the collection of personal and sensitive information the student is informed what information is to be collected and stored, the purpose of collection, if this information is to be disclosed to a third party and/or under what circumstances disclosure may occur; Once the student is informed, consent is obtained for the collection of information.

Surveys:

Danford College conducts internal surveys as a part of quality and assurance purposes and students may be required to provide additional information as a part of the survey. Students may choose not to participate in the internal Danford College surveys.

All students are required to undertake the AQTF Learner survey during their course at Danford College. By law, Danford College is required to report these surveys to ASQA as a part of compliance obligation for continuous improvement. Students can choose to anonymous while undertaking the survey.

Anonymity:

Danford College provides students 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.

5. Why We Collect Information

Danford College is required to collect personal information from students to process enrolments and fees and obtain the information required to provide suitable training and assessment services. The authority to collect this information is contained in the Education Services for Overseas Students Act, 2000, the Education Services for overseas Students Regulations 2001 and the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018.

Information collected about the student through forms, surveys and during the enrolment can be provided in certain circumstances, to the Australian Government and designated authorities and, if relevant, the Tuition Protection Service (TPS). In other instances, information collected can be disclosed without the student's consent where authorised or required by law.

This enables the College to provide the students with quality education services and support throughout the student lifecycle. The College may use the student's personal information as needed to comply with our obligations as an RTO.

Requiring Identification:

Danford College must require and confirm identification while enrolling a student for nationally recognised courses. We are authorised by Australian law to enrol students 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.

6. Disclosure of Information

How we use and disclose the personal information

Danford College will not disclose a student's personal information to another person or organisation unless:

- The College is aware that information of that kind is usually passed to that person or organization;
- The student has given written consent;
- Danford College believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious threat to the life or health of the individual concerned or another person.
- The disclosure is required or authorised by, or under law;
- The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue;
- Any person or organisation to which information is disclosed is not permitted to use or disclose the information for a purpose other than for which the information was supplied to them.

The personal information about students enrolled in a Course with the College may be shared with the Australian Government and designated authorities, such as ASQA (the RTO's registering body) and its auditors, the USI Registrar (as per above), DET, TPS, and the National Centre for Vocational Education Research (NCVER), Department of Home Affairs, ESOS Agency and other government bodies.

Students' personal information is made available to the Department of Home Affairs by recording the information in PRISMS in relation to administering the ESOS Act 2000 and the Migration Act 1958.

Danford College is required by law (under the National Vocational Education and Training Regulator Act 2011 (Cth)) to disclose the personal information we collect about the students to NCVER. Danford College is required to comply with AVETMISS reporting standard on an annual basis. We are also authorised by law (under the NVETR Act) to disclose student's personal information to the relevant state or territory training authority. The College may need to disclose International students' personal information to the country for which they hold the passport or as required by law.

For more information regarding the NCVER refer to Schedule 1.

Danford College may use the personal information provided by a student to market other internal products and services to them. A student may opt out of being contacted for marketing purposes at any time by contacting the College. Consent from the students is obtained to use their information for internal marketing during the Orientation and Induction sessions held by Danford College. Information will not be passed onto any third-party marketing companies without the prior written consent of the individual.

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

7. Storage and Security of the Collected Information

Danford College takes all reasonable steps required to protect and maintain personal and sensitive information.

Danford College stores all student records containing personal information securely on but not limited to the student database management, learning management portals, financial systems electronically. Under certain circumstances, the information may be stored in hard copies. Only authorised employees and contractors (who have agreed to keep information secure and confidential) have access to this information.

Danford College takes all reasonable security measures to protect the information collected from unauthorised access, misuse or disclosure. Security measures such as unique password requirements and restricted file access are used to maintain and protect students' privacy. Danford College's ICT systems are hosted internally with robust internal security to physical and cloud server locations. Virus protection, backup procedures and ongoing access monitoring procedures are in place.

Danford College retains information for periods as required. 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.

Danford College has a systematic process to dispose the student information and records which are no longer required. Danford 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. 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).

8. Access & Correction of the Personal Information

Students have the right to access or obtain a copy of the information that Danford College holds about them including personal details contact details and information relating to course

participation, progress and AQF certification and statements of attainment issued, at no cost, however Danford College may charge for any extra copies requested.

Requests to access or obtain a copy of the records held about a student must be made in writing by sending an email to support@danford.edu.au. The request must be approved by the CEO or delegate before obtaining the copy. The request will be processed within 10 working days.

In case of correction of the information provided, students can inform Danford College by sending an email to support@danford.edu.au or by completing and submitting the online form for Change of Personal details available on Danford College website www.danford.edu.au.

In order to ensure, Danford College maintains accurate and up – to – date information and as an obligation under the ESOS Standard 2018: Standard 3 (3.5), Danford College requests the students to submit the Change of Personal Details form every 6 months.

9. Enquires & Complaints regarding the Privacy Policy

Should a student have any general queries regarding the information handling and privacy policy, they may send an email to support@danford.edu.au or call at (03) 9642 1667.

If a student wishes to raise a complaint regarding the information handling and privacy policy, they may do so by completing and submitting the complaints and appeals form available on Danford College website www.danford.edu.au

For more information regarding complaints and appeals please refer to the POL007_Complaints and Appeals Policy.

10. Review and update of the Privacy Policy

Danford College reviews this 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.

Where this policy is updated, changes to the policy are widely communicated to stakeholders through internal personnel communications, meetings, training and

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documentation, and externally through publishing of the policy on Danford College's website and other relevant documentation (such as our Student Handbook) for students

Associated Documents

- Privacy Statement
- POL007_Complaints and Appeals Policy

Appendix

Definitions:

- 1) **ASQA:** Australian Skills Quality Authority (ASQA) are the national regulator for vocational education and training (VET)
- 2) **Australian Privacy Principle (APP):** The Australian Privacy Principles are principles-based law. This gives an organisation or agency flexibility to tailor their personal information handling practices to their business models and the diverse needs of individuals.
- 3) **RTO:** Registered training organisations (RTOs) deliver nationally recognised training in the VET sector. To deliver this training, they need to be approved by ASQA.
- 4) **ESOS:** The Education Services for Overseas Students (ESOS) Framework covers the provision of education services to overseas students. This legal framework sets out the requirements for registration as an ESOS provider. It also defines the standards that providers offering courses to overseas students must meet.
- 5) **AVETMISS:** AVETMISS stands for the Australian Vocational Education and Training Management Information Statistical Standard. It is a national data standard which ensures the consistency and accuracy of vocational education and training (VET) information and covers three national data collections:
 - the National VET Provider Collection: release 8.0
 - the National Apprentice and Trainee Collection: release 7.0
 - the National Financial Data Collection: Standard available January 2021

Schedule 1:

The NCVET is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector

The NCVET will collect, hold, use and disclose student's personal information in accordance with the law, including the Privacy Act 1988 (Cth) (Privacy Act) and the NVET Act.

Personal information may be used and disclosed by NCVET for purposes that include:

1. Populating authenticated VET transcripts;
2. Administration of VET;
3. Facilitation of statistics and research relating to education, including surveys and

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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:

1. Administration of VET, including program administration, regulation, monitoring and evaluation;
2. Facilitation of statistics and research relating to education, including surveys and data linkage;
3. Understanding how the VET market operates, for policy, workforce planning and consumer information.
4. Issuing a VET Statement of Attainment or VET Qualification, and populating Authenticated VET Transcripts;

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 personal information to any overseas recipients.

Surveys

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

For more information on how NCVER handles students' personal information please visit <https://www.ncver.edu.au/privacy>

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