

## Management of Personal Information Policy

### Purpose

ELC Management of Personal Information Policy is based on relevant federal and state legislation regarding the handling of personal information, including the Privacy Act 1988 and the Privacy Act and National Privacy Principles (2001)

Personal information is collected, solely for the purposes of our operation as a Registered Training Organisation. All reasonable steps are taken to protect personal information from misuse, loss, unauthorised access, modification or disclosure including restricted access to electronic files, secure storage of paper files and secure backup of data.

Upon enrolment students are issued a unique ID number for the purposes of maintaining ELC electronic records or for collection of data by Commonwealth and State Government Departments and Agencies.

Information about a student, except as required by law or as required under the Standards for NVR Registered Training Organisations, is not disclosed without the student's written permission. Where a student consents to disclosure of information, this consent is kept on the 'Register of Consent', a written version retained in the student file and on the Student Information Database.

### Collection of Personal Information

ELC starts recording personal information from the time an individual completes a signed ELC VET Enrolment form or enquires about a course of study.

ELC collects personal information only by lawful and fair means, and not in an unreasonably intrusive way.

At the time ELC collects personal information about an individual, ELC takes reasonable steps to ensure that the individual is aware of:

- The identity of ELC and contact details
- Their rights to gain access to the information
- The purposes for which the information is collected
- The main consequences (if any) for the individual if all or part of the information is not provided
- Any government department that may be provided with direct access to personal information without the prior consent of the individual.

Wherever possible ELC will collect personal information about an individual directly from that individual.

If ELC collects personal information about an individual from a third party, such as an education agent, reasonable steps will be taken to ensure the individual is or has been made aware of the conditions in the Personal Information Statement (Appendix A).

## Use & Disclosure

Personal information will not be provided to any third party without the prior signed written consent of the individual, such permission to be kept on file.

Providing consent by email is not acceptable as written consent as it cannot be signed or verified.

Copies of any information provided to a third party will be kept on file.

ELC may disclose personal information about an individual if ELC reasonably believes that:

- The use of disclosure is necessary to lessen or prevent:
  - serious threat to an individual's well-being and safety
  - serious threat to public health or safety
- Reason to suspect unlawful activity may be engaged in, then disclosure of personal information will be provided to authorities as part of the investigation.
- Disclosure to enforcement bodies is necessary to prevent, detect, investigate or prosecute criminal offences.

## Data Quality

ELC will take all reasonable steps to ensure that the personal information collected is accurate, complete and up to date. All students will be required to update/verify their personal details on the Student Information Database, at the beginning of each study period.

## Data Security

ELC will take reasonable steps to protect the personal information it holds from misuse, loss or unauthorised access, modification or disclosure.

- Information stored electronically is kept on a secure server and access is restricted to authorised employees. This server is regularly backed up and kept in a secure location.
- Paper-based documents containing personal information are in locked filing cabinets and held within a secure area within the premises.
- Where documents are required to be transferred to another location, personal information is transported securely in an envelope, folder or document bag.

## Access & Correction

- ELC will provide individuals with access to the personal information that has been collected about them.
- Individuals must write and sign a letter or request access to their personal information. Email requests are not sufficient evidence for this purpose and access will not be granted to protect the student.
- Individuals will be advised of how they may access their personal information and any applicable fee for issuance of documents that are required for this service within 10 days of receiving their written request.
- ELC will provide individuals with the opportunity to correct or update their personal information.

- Any amendments to personal information must be noted with appropriate documentation to ensure tracking such as change of contact details.
- Access may be given to an identified government officer from such agencies as DET, DHA or ASQA for the purposes of audit.

### Students

- All students can access their personal files held by ELC through a written request to the Administration Manager and RTO Manager.
- Students can update information that is correct or out of date by submitting an ELC Change of Contact Details form and submitting it to the Administration Manager.
- Access to a copy of student or staff records by a third party can only be obtained by written permission of the relevant person whose file has been requested. Such permission will identify those sections of the file to be made available.

## APPENDIX A: PERSONAL INFORMATION STATEMENT

In the course of its business as a vocational education institute, ELC Career College may collect information from students or potential students, either electronically or in hard copy format, including information that personally identifies individual users. ELC may also record various communications that students or potential students have with us.

ELC will only collect personal information by fair and lawful means which is necessary for the functions of ELC and is committed to ensuring the confidentiality and security of the information provided to us.

The information supplied by individuals to ELC will only be used to provide information about study opportunities, academic information and to maintain proper academic records. If any individual chooses not to give ELC certain information, then ELC may be unable to enrol the individual in a course or supply them with appropriate information.

The information that an individual provides may be disclosed to organisations that run courses in conjunction with ELC. Information will not be disclosed outside of ELC or its delivery partners unless we have been provided with the written authorisation for ELC to do so, or unless required or authorised by law.

Personal information about international students studying with ELC may be shared with the Australian Government and designated authorities, including ASQA, DET and DHA. This information includes personal and contact details, course enrolment details and changes and the circumstance of any suspected breach of a student visa condition.

ELC will take all reasonable security measures to protect personal information collected by ELC from unauthorised access, misuse or disclosure. As far as is permissible under law and unless otherwise expressly agreed, ELC has no further responsibility in relation to the privacy or confidentiality of any information ELC collects from or records about students or potential students.

Individuals have the right to access the personal information that ELC holds about them. Requests to access the personal information must be made in writing. Individuals will be advised of how they may access their personal information within 10 days of receiving their written request. In an individual considers their personal information to be incorrect, incomplete, out of date or misleading, they can request that the information be amended.

Also refer to the Privacy Statement in the Enrolment Terms and Conditions.