

## Policy Name: Privacy Policy

### 1. Purpose

The purpose of this policy is to outline how Streamline Training complies with Privacy Act 1988 and Australian Privacy Principles (APPs).

### 2. Policy Statement

Streamline Training is committed to providing quality training and assessment in accordance with the Standards for Registered Training Organisations (RTO) 2015 [The Standards]. As such, Streamline Training is required to comply with Federal law regarding Privacy and confidentiality of employees, students and contractors.

Streamline Training is committed to complying with obligation under Privacy Act 1988, and the associated Australian Privacy Principles (APPs), specifically in the way it collects, uses, secures and discloses personal information. Streamline Training is committed to safeguarding any confidential information obtained by the RTO.

Streamline Training will ensure :

- ☐ It maintains and provides a current Privacy Policy;
- ☐ Information gathered for the express purpose of training and assessment matters will not be disclosed to a third party unless prior written consent is provided by the individual concerned, except that required by law;
- ☐ The secure storage of all records;
- ☐ The confidentiality of all information maintained on records.

### 3. Policy Principles

#### 3.1 Legislation

- a) Streamline Training abides by the Privacy Act 1988 and associated Australian Privacy Principles (APPs).
- b) The APPs came into force on 12 March 2014 and set out standards, rights and obligations for the handling, holding, accessing and correction of personal information (including sensitive information).

#### 3.2 Underpinning Principles

- a) *Personal Information* is defined in the Privacy Act 1988 to mean “information or an opinion about an identified individual, or an individual who is reasonably identifiable:
  - i. whether the information or opinion is true or not; and
  - ii. whether the information or opinion is recorded in a material form or not.
- b) *Sensitive Personal Information* is defined in the Privacy Act 1988 to mean “information or an opinion about an individual’s” that is also personal information, such as:
  - i. racial or ethnic origin; or
  - ii. political opinions; or
  - iii. membership of a political association; or
  - iv. religious beliefs or affiliations; or
  - v. philosophical beliefs; or
  - vi. membership of a professional or trade association; or
  - vii. membership of a trade union; or
  - viii. sexual orientation or practices; or
  - ix. criminal record.

#### 3.3 PART 1 – Consideration of Personal Information Privacy

- i. Open and Transparent Management of Personal Information.  
Streamline Training will:
  - ☐ Ensure that personal information is managed in an open and transparent way.

- ☐ Take reasonable steps to implement practices and procedures that will facilitate dealing with enquiries or complaints from individuals regarding compliance with the Australian Privacy Principles (APPs).
- ☐ Ensure that it maintains an up-to-date policy about the management of personal information.
- ☐ Ensure that Streamline Training Privacy Policy contains the following information:
  - i. The kind of information that is collected and held;
  - ii. How the information is collected and held;
  - iii. The purposes for which information is collected, held, used and disclosed;
  - iv. How an individual may access their personal information that is held by Streamline Training and seek correction of such information as necessary;
  - v. How the individual may make a complaint about a breach of the APPs and how Streamline Training will deal with such a complaint;
  - vi. Whether Streamline Training is likely to disclose personal information to overseas recipients, and if so the countries in which such are likely to be located.
- ☐ Provide the Privacy Policy free of charge and in such form as appropriate, and as is reasonable.
- ii. Anonymity and pseudonymity  
 Streamline Training will :
  - ☐ Respect that individuals may not wish to identify themselves when making enquiries on Streamline Training products and services;
  - ☐ However, require full personal details as required by law and for identification purposes from students.

### 3.4 PART 2 – Collection of Personal Information

- a) Streamline Training will not collect personal information from you unless that information is necessary for one or more of its functions or activities, or is required by law.
- b) Streamline Training advises that it is required by law to collect, hold, use and supply personal information, in accordance with the National VET Provider Collection Data Provision Requirements.
- c) Streamline Training will take reasonable steps at or before the time of collection to ensure that you are aware of:
  - i. Who we are and how to contact us;
  - ii. How to gain access to your own information;
  - iii. The purpose for which the information is being collected;
  - iv. Any organisation to which we would normally disclose information of that kind;
  - v. Any law that requires the particular information to be collected;
  - vi. The main consequences for the individual if all or part of the information is not provided.
- d) Streamline Training collects information from you in the following ways:
  - i. When you register your interest online, apply for enrolment, request certain services or products, or otherwise contact or do business with us.
  - ii. Information may be collected from enrolment forms, certified documents, telephone calls, faxes, emails, letters sent by you.
  - iii. Information may be collected from third parties, such as other training providers, regarding confirmation of training and ongoing professional development that you have attended, as permitted by you.
- e) Should Streamline Training collect information about you from a third party we will take reasonable steps to ensure that the individual is or has been made aware of the matters listed above except to the extent that making the individual aware of the matters would pose a serious threat to the life or health of any individual.
- f) Streamline uses student and learning management systems that collect personal information. Please click here for [data management information](#).

### 3.5 PART 3 – Dealing with Personal Information

- a) Streamline Training will not use or disclose personal or sensitive information for any purpose other than what it was collected for, unless the relevant person has provided written consent to use or disclose that information in circumstances that are different to those for which it was collected.  
 The circumstances where an exception may occur are:
  - i. Where the use or disclosure of this information is required or authorised by or under an Australian law or a court/tribunal order;

- ii. The individual would reasonable expect Streamline Training to use or disclose the information for the secondary purpose;
  - iii. A permitted health situation exists in relation to the use or disclosure of the information by Streamline Training;
  - iv. A permitted general situation exists in relation to the use or disclosure of the information by Streamline Training;
  - v. Streamline Training reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- b) Streamline Training collects your personal information so as to:
- i. Process applications;
  - ii. Manage your enrolment;
  - iii. Record and maintain your details;
  - iv. Administering training programs;
  - v. Record and maintain details of your ongoing training and assessment;
  - vi. Provide you with details regarding student services, benefits, and training opportunities;
  - vii. Notify you about upcoming events and opportunities;
  - viii. Gain feedback from you;
  - ix. Communicate with you;
  - x. Report to relevant authorities as required by law.
- a) Direct Marketing  
Streamline Training:
- i. May use personal information (specifically your name and relevant address details) and information about your preferences for direct marketing (ie the communication channels which you prefer for receiving direct marketing from us and the types of products and services in which you are interested in) so as to let you know about our services and benefits, where we have your consent.
  - ii. Provides an opt-out and/or unsubscribe method that is easily accessible for individuals to request not to receive direct marketing communications.
- b) Cross Border Disclosure  
Streamline Training:
- iii. Does not disclose personal information to overseas recipients unless prior written approval is received by the individual who the personal information relates.
- c) Adoption, use or disclosure of Government Related identifiers  
Streamline Training:
- i. Is required by law (*Student Identifier Act*) to collect, maintain and report to relevant Government agencies the individual's Unique Student Identifier (USI) number in accordance with the National VET Provider Collection Data Provision Requirements.
  - ii. Will not disclose the Unique Student Identifier (USI) number for any other purpose, including on any Certification documents you receive.
  - iii. Must not adopt the Unique Student Identifier (USI) number as its own identifier of the individual.

### 3.6 PART 4 – Integrity of Personal Information

- a) Quality of personal information  
Streamline Training will take steps, as are reasonable, to ensure that the personal information it:
- i. Collects is accurate, up to date and complete;
  - ii. Uses or discloses, is, having regard to the purpose of the use or disclosure, accurate, up to date, complete and relevant.
- b) Security of personal information  
Streamline Training will take steps, as are reasonable in the circumstances to:
- i. Protect the information from misuse, interference and loss as well as unauthorised access, modification or disclosure.
  - ii. Destroy the information or to ensure that the information is de-identified.

### 3.7 PART 5 – Access to, and correction of, Personal Information

- a) Streamline Training provides all students with electronic access to their own personal records, where the individual can update and maintain their own personal information.
- b) In some circumstances, Streamline Training may not permit access to individuals for their personal information. If this is ever the case, Streamline Training will provide full details for the legal reasons for this decision. These may include that Streamline Training believes :
  - i. That giving access to the information would pose a serious threat to the life, health or safety of the individual, or to public health or public safety; or
  - ii. Giving access would have an unreasonable impact on the privacy of other individuals; or
  - iii. The request for access is frivolous or vexatious; or
  - iv. The information relates to existing or anticipated legal proceedings between Streamline Training and the individual, and would not be accessible by the process of discovery in those proceedings; or
  - v. Giving access would reveal the intentions of Streamline Training in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
  - vi. Giving access would be unlawful; or
  - vii. Denying access is required or authorised by or under an Australian law or a court/tribunal order; or
  - viii. Both of the following apply:
    - Streamline Training has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Streamline Training functions or activities has been, is being or may be engaged in;
    - Giving access would be likely to prejudice the taking of appropriate action in relation to the matters; or
  - ix. Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
  - x. Giving access would reveal evaluative information generated within Streamline Training in connection with a commercially sensitive decision-making process.
- c) When dealing with requests for access to personal information, Streamline Training will:
  - i. Respond to request for access within 30 days of the request, if from an individual, and within a reasonable time, if the request is from an organisation; and
  - ii. Provide access to the information in the manner requested, if it is reasonable and practicable to do so.
- d) Streamline Training does not charge a fee for access to personal information. The exception is re-prints of certification documentation previously supplied.
- e) With regard to the correction of personal information held:
  - i. should Streamline Training be satisfied that information is inaccurate, out of date, incomplete, irrelevant or misleading, Streamline TrainingG will take such steps as reasonable to correct the information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.
  - ii. Should Streamline Training refuse to correct information, Streamline Training will give written notice to the individual that sets out:
    - The reason for refusal
    - The mechanisms available to complain about the refusal; and
    - Any other matter prescribed by the regulations.

### 3.8 PART 6 – NCVER - National VET Data Specific Privacy Information

#### 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.

#### 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](http://www.ncver.edu.au/privacy).

If you would like to seek access to or correct your information, in the first instance, please contact your RTO 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.dese.gov.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 us 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

## 3.9 PART 7 - Cookies

This cookie policy ("Policy") describes what cookies are and how and they're being used by the [streamlinetraining.com.au](http://streamlinetraining.com.au) website ("Website" or "Service") and any of its related products and services (collectively, "Services"). This Policy is a legally binding agreement between you ("User", "you" or "your") and this Website operator ("Operator", "we", "us" or "our"). If you are entering into this agreement on behalf of a business or other legal entity, you represent that you have the authority to bind such entity to this agreement, in which case the terms "User", "you" or "your" shall refer to such entity. If you do not have such authority, or if you do not agree with the terms of this agreement, you must not accept this agreement and may not access and use the Website and Services. You should read this Policy so you can understand the types of cookies we use, the information we collect using cookies and how that information is used. It also describes the choices available to you regarding accepting or declining the use of cookies.

## What are cookies?

Cookies are small pieces of data stored in text files that are saved on your computer or other devices when websites are loaded in a browser. They are widely used to remember you and your preferences, either for a single visit (through a "session cookie") or for multiple repeat visits (using a "persistent cookie").

Session cookies are temporary cookies that are used during the course of your visit to the Website, and they expire when you close the web browser.

Persistent cookies are used to remember your preferences within our Website and remain on your desktop or mobile device even after you close your browser or restart your computer. They ensure a consistent and efficient experience for you while visiting the Website and Services.

Cookies may be set by the Website ("first-party cookies"), or by third parties, such as those who serve content or provide advertising or analytics services on the Website ("third party cookies"). These third parties can recognize you when you visit our website and also when you visit certain other websites. [Click here](#) to learn more about cookies and how they work.

### **What type of cookies do we use?**

#### **Analytical cookies**

These cookies enable us and third-party services to collect aggregated data for statistical purposes on how our visitors use the Website. These cookies do not contain personal information such as names and email addresses and are used to help us improve your user experience of the Website.

#### **Social media cookies**

Third party cookies from social media sites (such as Facebook, Twitter, etc) let us track social network users when they visit or use the Website and Services, or share content, by using a tagging mechanism provided by those social networks.

These cookies are also used for event tracking and remarketing purposes. Any data collected with these tags will be used in accordance with our and social networks' privacy policies. We will not collect or share any personally identifiable information from the user.

### **What are your cookie options?**

If you don't like the idea of cookies or certain types of cookies, you can change your browser's settings to delete cookies that have already been set and to not accept new cookies.

### **Changes and amendments**

We reserve the right to modify this Policy or its terms related to the Website and Services at any time at our discretion. When we do, we will post a notification on the main page of the Website. We may also provide notice to you in other ways at our discretion, such as through the contact information you have provided.

An updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Your continued use of the Website and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes.

### **Acceptance of this policy**

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Website and Services you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Website and Services. This cookie policy was created with the [cookie policy generator](#).

### **Contacting us**

If you have any questions, concerns, or complaints regarding this Policy or the use of cookies, we encourage you to contact us using the details below:

info@streamlinetraining.com.au

This document was last updated on December 10, 2021



#### **4. Streamline Training Responsibilities**

Managing Director ensures that all stakeholders are made aware of this policy and its underpinning legislative requirements and comply with this policy at all times.

Managing Director ensures that all students have access to and awareness of this policy.

#### **5. Records Management**

All personal information and records are maintained in accordance with Records Management Policy. (See Records Management Policy)

#### **6. Monitoring and Improvement**

All practices for Privacy are monitored by the Managing Director and areas for improvement identified and acted upon. (See Continuous Improvement Policy)

#### **Contacting us**

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[info@streamlinetraining.com.au](mailto:info@streamlinetraining.com.au)

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