

<h1>Privacy and Personal Information Policy</h1>		Alana Kaye Policy Manual Policy Number: AKP0050 Responsible Officer: CEO Date of Issue: April 2017 Review Date: December 2021 RTO Code: 70056 CRICOS Code: 03675K	
		Modifications:	V1.1 Addition of CRICOS Code – January 2020 V2 Addition of information with regard to marketing and webpage activity – August 2021
Associated Documents:	Records Management Policy; Records Management Procedure		
Authorised by: CEO	Issued to: All staff	Pages: 3	Version: 2

Purpose

This policy ensures that Alana Kaye meets its legal and ethical requirements in regard to the collection, storage and disclosure of personal information it holds in regard to its current, potential and previous clients, staff, and interactions with external organisations.

Requirement

The Privacy Act 1988 (Privacy Act) is an Australian law that regulates the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information. The Privacy Amendment (Enhancing Privacy Protection) Act 2012 introduced many significant changes to the Privacy Act, including 13 Australian Privacy Principles (APPs) that apply to the handling of personal information.

1. Principles

- 1.1 In collecting personal information Alana Kaye will comply with the legislative requirements
- 1.2 Alana Kaye is committed to ensuring the confidentiality, integrity and security of all information.

2. Collection of information

- 2.1 In the course of its business, Alana Kaye will collect information from students, potential students, and other clients either electronically or in hard copy format; including information that personally identifies individual people.
- 2.2 Alana Kaye will record various communications between the organisation and individuals, clients and associated organisations.
- 2.3 Alana Kaye will only collect personal information by fair and lawful means that is necessary for the functions of Alana Kaye.

3. Use of information

The information supplied by individuals may be used to:

- process any application for enrolment you might submit to us.
- deliver or facilitate the provision of training and other related products and services and retain evidence of participation / completion.
- verify your identity.
- develop student registers to enable us to communicate with you and any nominated parent/guardian.
- keep adequate records for audit, record keeping and compliance purposes.
- facilitate health, safety and wellbeing at our campuses and other training locations (including online)
- develop, run, administer and promote competitions, programs, activities and other events run by us, including promotions on social media.
- keep you informed of news and information relating to Alana Kaye College including by distributing newsletters, publications and other communication via various mediums including direct mail, email and SMS / MMS messages.
- market and promote products, services, merchandise and special offers made available by us or our respective commercial partners.
- administer and manage our websites and provide you with access to those websites.
- administer and manage any account you may hold with us.
- if you are an employee or other representative of a customer to which we provide our products and services or a supplier or service provider to us, communicate with you about your or your employer's engagement with us and otherwise as specified in this Privacy Policy; and
- research and develop new programs, activities and other events relating to education and other related products and services.

We respect that you may not wish to share your personal information with us, and we will take reasonable steps to allow you to opt-out of sharing information if that is possible.

4. Disclosure of personal information

4.1 Alana Kaye will not disclose an individual's personal information to another person or organisation unless:

- The student has consented;
- The student would reasonably expect, or have been told, that information of that kind is usually passed to those individuals, bodies or agencies;
- It is required or authorised by law;
- If it will prevent or lessen a serious and imminent threat to somebody's life or health;
- If necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue;
- IT contractors and database designers and service internet service suppliers;
- Legal and other professional advisers;
- Insurance brokers, loss assessors and underwriters;
- Superannuation fund managers;
- Background checking and screening agents;
- Potential and actual employers and clients of Alana Kaye;
- Referees, or a person who seeks reference about you;
- A professional association or registration body that has a proper interest in the disclosure of your personal and sensitive information;
- A Workers Compensation body.

- 4.2 Any person or organisation to whom personal information is disclosed as described in this policy is not permitted to use or disclose the information for a purpose other than the purpose for which the information was supplied to them.
- 4.3 Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of the public revenue, Alana Kaye shall include in the record containing that information, a note of the disclosure.
- 4.4 **Our Websites** – When you visit our website, our systems may record certain information about your use of that website (such as which web pages you visit and the time and date of your visit). We use this information to help analyse and improve the performance of our web sites. In addition, we may use "cookies" on our websites. Cookies are small text files that help a website to remember your preferences and improve your experience of using that website. Using cookies is standard practice for most large websites. In some cases, the cookies that we use may collect some personal information about you. We will treat this information in the same way as other personal information we collect about you. If you prefer, you may be able to disable cookies on your internet browser. However, if you do so, you will not be able to enjoy the enhanced user experience that our cookies offer.

We may engage third parties, to help analyse how our websites are used. This analysis is performed using data collected from the websites, including by using cookies which are stored on your computer. The information generated is used to create reports about the use of our websites, and these third parties may store this information. However, this information is not intended to and will generally not include any personal information. If you would prefer that these third parties do not collect even any anonymous data about how you use our websites, you may be able to opt-out. Please contact us for more information.

We may also collect Internet Protocol (IP) addresses relating to you when you access and use the web sites. IP addresses are assigned to computers on the internet to uniquely identify them within the global network of computers which makes up the internet. We may collect and manage IP addresses for internet session management and security purposes.

Some of the content on our websites may include links to third party websites or applications made available by third parties, such as social media buttons or links that allow you to share content or links to our website through the relevant third-party platforms. These third-party links or applications themselves may facilitate collection of information by those third parties through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these links or applications or the collection and use practices of the relevant third parties. Please visit the relevant third-party websites to understand their privacy practices and options they may make available to you in relation to their collection of your personal information.

5. Security of personal information

- 5.1 Alana Kaye will take all reasonable steps to ensure that any personal information collected is:
- a) relevant to the purpose for which it was collected
 - b) up to date
 - c) complete
 - d) accurately recorded.
- 5.2 Alana Kaye will store securely all records containing personal information and take all reasonable security measures to protect personal information collected from unauthorised access, misuse or disclosure.

6. Right to access records

6.1 Individuals have the right to access or obtain a copy of the personal information that Alana Kaye holds about them.

7. Students

7.1 Students agree to the collection of information by signing the declaration contained in the enrolment form. Further information is provided in the Student Handbook.

9. Staff

Staff information may be collected and retained and may include:

- Resume
- Information about incidents and or workplace accidents in which you are involved;
- Personal information
- Leave applications, medical certificates
- Performance appraisals
- Complaint, investigation or inquiry in which staff are involved
- Insurance investigation, litigation, professional disciplinary or criminal matter, inquest or inquiry

Policy Author	Rachael Trbovic	Date: 1 April 2017
Approved by	Alana Anderson	Date: 1 April 2017
Approver signature	Alana Anderson	
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