



Privacy Policy and Procedure



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1. Introduction

1.1. Purpose

The purpose of this document is to inform all learners, potential learners, clients, stakeholders and employees of the policy and procedures relating to privacy and personal information.

1.2. Scope

This policy and procedure relates to learners, potential learners, clients, stakeholders and employees within the following organisations:

- Track Protection Services Pty Ltd
- Accell Pty Ltd (Registered Training Organisation)
- Rail Futures Pty Ltd
- RailCom Pty Ltd

And will hereafter referred to as the 'Company'.

1.3. Document Owner

The Managing Director is the Document Owner and is the initial point of contact for all queries relating to this Policy and Procedure.

1.4. Relevant Documents

- Issuance of Testamurs Policy
- Reporting Requirements of VET Data Policy and Procedure
- Record Management Policy
- Privacy Disclosure Form

2. Policy

The Company is committed to ensuring the security of its employees, learners and client's information. The Company ensures it meets its legal and ethical requirements in regards to the collection, storage and disposal of personal information it holds. Accell Pty Ltd will comply with all legal requirements in alignment with the RTO Standards for its learners and clients.

3. Procedure

3.1. Collection of Information

In the course of its business and through the use of company websites, the company will collect information from learners, potential learners, clients and others, either electronically or in hard copy format; including information that personally identifies individual people.

The company may record various communications between itself and individuals, clients and other third parties.

The company will only collect personal information by fair and lawful means that is necessary for the functions of business.

The company does not wish to collect information which is sensitive information as defined under the Privacy Act being information or opinions about the visitor's health, political affiliations, sexual preferences, religious beliefs, racial or ethnic origin or other such private information.

The types of personal information that may be collected and held includes (but is not limited to):

- information given to act for on your behalf, **ie** name, address, occupation, date of birth, and other contact details;
- information about other individuals collected in the course of acting for clients; and
- information about other people who come into contact with a member of company employees.
- Title
- Full names
- Street address
- Mailing address
- Date of Birth
- Gender
- Country and town of origin
- Ethnicity/aboriginality
- Level of achieved education
- Year left school
- Employment status
- Disability/medical issues that may impact on ability to undertake learning
- Other issues that may impact on ability to undertake learning (LLN)
- Ability to speak English
- Assistance required with reading, writing and numeracy
- Unique student identifier (if already known)
- Employer details
- Emergency contact details
- Study reasons

Learners who authorise Accell to apply for their Unique Student Identifier (USI) on their behalf, are required to supply **one** of the following forms of Personal Identification:

- Driver Licence
- Medicare number
- Australian passport
- Birth certificate
- Certificate of Registration by Descent

The company will collect personal information by way of forms filled out by people, face-to-face meetings, interviews, business cards, telephone conversations and from third parties.

The only information collected through website is information offered. Please note that some of this information will not be personal information because it will may not reveal an identity.

3.2. Use and Disclosure of Personal Information

The company may use and disclose your personal information for the primary purpose for which it was collected, for reasonably expected secondary purposes, and in other circumstances authorised by the Privacy Act. In general, the company use and disclose personal information for the following purposes only:

- to conduct our business;
- to communicate with you; and
- to comply with our legal obligations of record keeping and compliance data reporting.

If a third party requests information that does not comply with the above it must be authorised by the client, employee or learner. The preferred method of an authorised release to a third party is in writing however under extreme circumstances verbal approval may be accepted. All approvals will be documented into the learner management system or on the data system folder.

The company may disclose personal information to others within the company, other companies or individuals who assist in providing services or who perform functions on our behalf (such as specialist consultants), courts, tribunals and regulatory authorities. The company will take reasonable steps to ensure that anyone to whom information is disclosed to will respect the confidentiality of the information and abides by the APPs or equivalent privacy laws.

Accell Pty Ltd collects personal information from its clients/learners as part of:

- Learner registration (enrolment) process – online or hardcopy
- Unique Student Identifier (USI) – application and validations
- Learner records (database)
- Issuance of qualifications/statements of attainments
- Data reporting to employers and government departments
- Interviews, meetings, business cards, telephone conversations and from third parties
- Funding requirements

The Company may refuse access, correction or to delete personal information in certain circumstances. If this occurs the company will provide a reason for the decision.

3.3. Management of Personal Information

In accordance with the Privacy Act, the company takes reasonable steps to protect the security of personal information. This includes protecting the information from misuse or loss and from unauthorised access, modification or disclosure, for example, by the use of physical security and restricted access to electronic records. Where information is no longer required and is permitted purpose under the APPs, it will be destroyed.

The company endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. We will amend any personal information held which is inaccurate, incomplete or out-of-date.

Accell's holds data for learners via a secure Server. The data is transmitted off site under strict Data Management protocols. This Server is backed up remotely and internally every 24 hours. The internal back up hard drive is removed from the premises each night for security purposes. Data on this hard drive can only be restored by Accell's IT consultant company and only by direct authority from the Managing Director. The remote backup is completed via the internet and mirrored onto backup files through the multiple servers of the IT consultant.

A learner management system is utilized for Accell's learners and clients. The system is secured through password entry and each user is restricted by their role.

3.4. Sensitive Information

Some personal information that is collected is 'sensitive information'. Sensitive information includes personal information relating to a person's health, racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences, or criminal record.

Sensitive information will be used or disclosed only for the primary purpose for which it was collected or a directly related secondary purpose, unless it is agreed otherwise, or where certain other limited circumstances apply (for example, where required by law).

3.5. Enquiries and Complaints

All privacy enquiries and complaints should be directed in writing to the Companies head office through the use of the Access to Personal Information Form.

Complaints can be lodged through the Complaints and Appeals process. Please contact the office below for a formal copy.

Head Office

Shop 4-7
3 Obi Obi Road
Mapleton QLD 4560
07 5445 7998