

## I. PURPOSE

The Vanguard Business Education is committed to protecting the privacy of personal information. This policy sets out the way we handle personal information including the use and disclosure of personal information, as well as client rights to access their personal information.

## 2. SCOPE

This policy only applies to our databases and files and does not cover any State, Territory or Commonwealth Government database or file.

## 4 POLICY

### 4.1 Personal Information collected by Vanguard Business Education

In order to provide training and assessment services we need to collect personal information upon a client enrolling in a course/qualification to be provided by Vanguard Business Education. This information is required to be reported to state/territory registering bodies under the requirements of the Australian Vocational Education and Training Management Information Statistical System (AVETMISS). Information collected is as follows:

- Name;
- Address;
- Contact details (telephone);
- Date of Birth;
- Gender;
- Country of birth;
- Citizenship;
- Whether Aboriginal or Torres Strait Islander;
- Language spoken at home;
- Disability information;
- Education details;
- Previous qualifications;
- Employment status,
- Reason for undertaking study

Vanguard Business Education only collects personal information by fair and lawful means and not in an unreasonably intrusive manner.

The enrolment form completed by clients contains a disclaimer outlining why the personal information is collected and how it is used and clients are required to sign the disclaimer as their agreement to the use of their personal information.

### 4.2 Sources of Personal Information Collected

Vanguard Business Education collects personal information directly from each client at enrolment.

Vanguard Business Education does not collect personal information from any other source.

### 4.3 Advice provided to clients

At the time Vanguard Business Education collects personal information we will take reasonable steps to ensure that clients are made aware of:

- (a) Vanguard Business Education identity and how to contact us;

- (b) The client's rights with regard to accessing their personal information;
- (c) the purpose for which the personal information was collected;
- (d) to whom we disclose personal information to;
- (e) any law that requires us to collect particular personal information; and
- (f) the main consequences, if any, for the client if they do not provide all or part of the information we require.

#### **4.4 Use and Disclosure**

Vanguard Business Education will use its best efforts to ensure that the information provided to us remains private and is used only for the purposes the client agree to.

Vanguard Business Education will not reveal, disclose, sell, distribute, rent, license, share or pass personal information on to a third party, other than those that we have a binding agreement with ensuring that the third party affords the personal information similar levels of protection as we do.

In order to provide clients with training and assessment services, we are required to disclose personal information to third parties such as:

- State/Territory Registering Bodies; and,
- National Centre for Vocational Education Research

For the purposes of AVETMISS reporting and claiming public funds for the delivery of training and assessment services under contracts such as User Choice and Apprenticeship and Traineeship Training Programs.

Further, Vanguard Business Education may use and disclose personal information to provide training and assessment services specified to the client at the point of collection or for another purpose if:

- The client would reasonably expect us to disclose it for that purpose;
- That purpose is related to the purpose specified to the client at the time of collection.
- Vanguard Business Education reasonably believes that the use is necessary to lessen or prevent a serious and imminent threat to an individual's life or health;
- Vanguard Business Education has reason to suspect that unlawful activity has been, or is being engaged in, and uses the information as part of its investigation, or in reporting its concerns to the relevant authority;
- The use and disclosure is specifically authorised by law; or
- The use and disclosure is reasonably necessary for the enforcement of the criminal law, a law imposing a pecuniary penalty, or for the protection of the public revenue.

Vanguard Business Education does not use or disclose personal information for the purposes of direct marketing unrelated products or services.

#### **4.5 Data Quality**

Vanguard Business Education will take reasonable steps to ensure that personal information is accurate, complete and up-to-date. Clients are encouraged to help us keep their personal information accurate, complete and up-to-date by contacting our delivery site or this organisation and informing us of any changes to details.

#### **4.6 Data Security**

Vanguard Business Education are committed to protecting the privacy of personal information. We take reasonable steps to protect personal information from misuse, loss and from unauthorised access, modification or disclosure. We ensure this by having such security measures as:

- Individual password access to systems and databases
- Secure file cabinets

We will also take reasonable steps to destroy or permanently de-identify personal information if it is no longer required for any purpose.

#### **4.7 Access and Correction**

Clients are provided with the opportunity to access the personal information we hold on them and where appropriate, are able to correct that information if they determine that it is incorrect.

#### **4.8 Identifiers**

Vanguard Business Education will not adopt as its own identifier an identifier that has been assigned by a government agency.

Where practicable Vanguard Business Education will not use or disclose an identifier assigned to an individual by a government agency.

#### **4.9 Resolving Privacy Concerns**

Clients are able to raise any concerns they may have regarding our personal information handling practices by either discussing concerns with our delivery site or by calling Vanguard Business Education head office direct.

#### **4.10 Use of the Internet/E-Data Transmission**

Vanguard Business Education will take all reasonable steps to protect personal information security when using e-data transfers but is aware that no transmission of information by email or to a registering body website is ever totally secure.

Security of data transmitted to state and territory registering bodies is managed by these bodies.