



Privacy Policy (OM037P)

Issue: 1.1

Date Approved/Endorsed: 18/07/2022

Next Review: 07/07/2025

1 Objective

Central Regional TAFE (CRT) respects an individual's privacy and is committed to protecting their personal information. In complying with the [Privacy Act 1988](#) as amended and the [Australian Privacy Principles](#) (APP), this Policy sets out how CRT will use, hold, and manage an individual's personal information that CRT may collect from time to time.

This Policy applies to all CRT staff, students, associates, and stakeholders.

2 Policy

2.1 Notification of collection of personal information and consent

CRT will take all reasonable steps to notify or make an individual aware of the specific function, circumstances, and consequences of the collection of personal data prior or as soon as possible after collecting such data.

By providing your personal information to CRT you consent to its use, storage, and disclosure in accordance with this Policy.

2.2 Collection of Personal Information

2.2.1 As a Student:

(a) Only personal information that is necessary for or directly related to training delivery will be collected directly from the individual or their authorised representative when:

- applying and enrolling with CRT;
- completing any application form in person; by phone or by email;
- submitting information via CRT's website.

Personal information may also come from third parties such as associated commercial partners and social media sites.

(b) If an individual is browsing CRT's website or social networking services:

- personal information is not collected however, systems may record certain information about use of the website;
- CRT may use "cookies" which is a block of data shared between a web server and the user's browsers. The information collected through Cookies may be used by CRT to make the website more efficient;
- the following information may be automatically recorded by the website's web server for statistical and system administration purposes:
 - server address;
 - top level domain name;
 - the date and time of a visit;
 - the pages accessed and downloaded;
 - operating system and the type of browser used.

- (c) If an individual follows a link from CRT website to a third-party website or links that allows shared content; these third-party links may facilitate collection of information through this interaction (this may occur indirectly). Please read the privacy statement of the relevant third-party websites and options they may make available to individuals in relation to collection of personal information.

Disclaimer:

CRT cannot be held responsible for the theft of data by a third-party, or the consequences resulting from the loss of data where that loss is associated with the technical malfunction, tampering by a third-party, viruses, computer bugs or any action or event beyond the reasonable control of CRT.

2.2.2 As an Employee or prospective Employee:

- (a) Recruitment purposes;
(b) Remuneration payment (banking details);
(c) Performance Management.

Specific details may be obtained by contacting our Human Resources department.

2.3 What Personal and Sensitive Information is Collected

- (a) Personal information may include, but is not limited to:
- title, full legal name/s, postal and residential address, all contact telephone number/s, emergency contact details, email address, date of birth, gender, occupation, education history, residency status, employer details;
 - CRT Student-payment details (i.e., credit card, bank account);
 - photographs or voice recordings;
 - other information voluntarily provided by an individual (i.e., in survey responses or competitions or other events).
- (b) Health and sensitive information about an individual will only be collected if an individual directly provides that information to CRT.
- (c) Health and sensitive information may include, but is not limited to:
- Government related identifiers which may include, but is not limited to:
 - Unique Student Identifier (USI)
 - Tax File Numbers for VET Student Loans
 - Citizenship and residency documents
 - Concession details
 - Birth Certificate, driver's licence or passport to establish identity
 - Background characteristics such as prior education and language
 - Health information about an individual
 - Racial or ethnic origin
 - Criminal records
 - Religious affiliation
 - Political opinions.

2.4 Use and/or Disclosure of Personal Information

2.4.1 Primary and secondary purposes may include, without limitation, use of an individual's personal information to:

- allow CRT to answer individual's enquiries;
- process any application for enrolment or employment with CRT;
- verify an individual's identity;
- inform another agency of a change of address;
- conduct statistical and/or regulatory student surveys.

You may opt out of any survey at the time of being contacted.

2.4.2 CRT may use an individual's personal information for the primary purpose for which it was collected and secondary purposes either related to the primary purpose or as otherwise set out in this Policy.

2.4.3 An individual's health and/or sensitive information may be used to:

- ensure any education programs in which they participate are run safely and in accordance with any special health needs requirements;
- for insurance purposes; or
- otherwise as required or authorised under an Australian law or legislation.

CRT may use de-identified health information or de-identified sensitive information to prepare submissions to government or a government body or plan events and activities.

2.4.4 In some circumstances CRT may also need to use or disclose personal and/or sensitive information (including to third parties) where required to do so by law or due to statistical, legislative/regulatory authority and research requirements which include, but not limited to:

- Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS)
(<https://www.ncver.edu.au/support/topics/avetmiss/fact-sheets>).

NB: personal information that will be included in the National VET Provider Collection may be used or disclosed in accordance with the [National VET Data Policy](#).

- VET Student Loans applications (www.studyassist.gov.au)
- [Health Practitioner Regulation National Law Act 2010](#)
- school (if enrolled in a school-based apprentice or trainee or are a VET Delivery to Secondary Students student);
- employer (if enrolled with CRT as an apprentice or trainee);
- parent/guardian if under the age of 18 (unless an individual has formally advised CRT not to provide this information);
- government authorities and agencies;
- organisations conducting student surveys;
- researchers;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- necessary to lessen or prevent a serious threat to the life, health or safety of an individual, or to public health or safety;

- CRT professional advisers, accountants, auditors and lawyers or insurer.

You may opt out of any survey at the time of being contacted.

- 2.4.5 If an individual chooses not to provide personal information to CRT for the purposes set out in this Policy, they may not be able to enrol in courses or receive or access certain products and services.
- 2.4.6 In the event of a merger or re-organisation, CRT may transfer any and/or all personal information it has collected from an individual to the relevant third-party.
- 2.4.7 CRT does not use a third-party data storage provider which may be located or use systems that store personal information in other countries.
- 2.4.8 An individual may choose to deal with CRT anonymously or under a pseudonym where lawful and practicable (i.e., provided CRT is able to provide the relevant service and conduct business with an individual without further information). For example, it might not be practical to deal with an individual anonymously when processing a payment, delivering goods or services, communicating personally or when required or authorised by law or a court/tribunal order to deal with identified individuals.

Anonymity means that an individual cannot be identified, and CRT does not collect personal information or identifiers.

Pseudonymity means the individual may deal with CRT by using a name, term or descriptor that is different to the individual's actual name (e.g., pen-name or screen-name). The use of a pseudonym does not necessarily mean that an individual cannot be identified. The individual may choose to divulge their identity or to volunteer personal information necessary to implement a particular transaction or service.

2.5 Further Information and Contact Details

- 2.5.1 CRT will endeavour to collect, use and disclose personal information that is accurate, complete and up to date. CRT will verify the accuracy and currency of an individual's personal information at each subsequent engagement with the individual, particularly if there has been a lengthy period since collection. Alternatively, if an individual believes their personal information is inaccurate, incomplete, or out of date they are to contact CRT (see 2.5.5) which will take reasonable steps to ensure the information is corrected.
- 2.5.2 All students and staff of CRT can access their personal information held by CRT at no charge (see 2.5.5) unless CRT is authorised to refuse access by an Act, law or a court/tribunal order. Alternatively, under the [Freedom of Information Act 1982](#). (Refer to [FOI Statement](#)).
- NB: Access to reprints of an individual's academic transcript and/or Award incurs fees as per the [VET Fees and Charges Policy](#) as published.
- 2.5.3 CRT will not use or disclose personal information for the purpose of direct marketing unless it has collected that information from an individual who may have the expectation it could be used for marketing purposes. If an individual

wishes to opt out of direct marketing, they are to contact CRT (see 2.5.5) however, individuals cannot opt out of receiving administrative messages in relation to any course in which they are currently enrolled.

Marketing is not “direct” if personal information is not used or disclosed to identify or target particular recipients (e.g., Course Guides, promotional flyers to mailboxes, displayed advertisements, etc)

2.5.4 If individuals wishing to make a complaint in relation to breach of their privacy, they are to contact CRT (see 2.5.5). All privacy complaints will be taken seriously and will be investigated in a confidential manner.

2.5.5 All initial contact may be made to CRT:

in writing to:

Manager Planning and Quality
Central Regional TAFE
Locked Mail Bag 103
GERALDTON WA 6531

or:

Email: quality@crtafe.wa.edu.au

2.5.6 CRT takes steps to ensure that any record containing personal and sensitive information is protected by such security safeguards (e.g., information technology security and backup, privacy and security aware culture, access security) as it is reasonable in the circumstances to take against loss, unauthorised use, modification or disclosure and misuse.

2.5.7 CRT may receive unsolicited personal information. Unsolicited personal information is personal information received by CRT where CRT has taken no active steps to collect the information (e.g., misdirected mail; petition; an employment application on an individual’s own initiative and not in response to an advertised vacancy; promotional flyer promoting an individual’s business or services, etc).

Any unsolicited personal details received, which could have been collected under clause 2.2 above, will be afforded appropriate privacy protection, even where CRT has not solicited the personal information.

Should CRT determine any unsolicited personal information could not have been collected under clause 2.2 above, CRT will destroy or de-identify the personal information if it is lawful or reasonable to do so.

2.5.8 CRT will not disclose personal information to an overseas recipient (i.e., cross-border disclosure of personal information) without expressly informing the individual and obtaining consent from the individual.

3 Definitions

Sensitive information – information or an opinion about an individual’s racial or ethnic origin; religious beliefs or affiliations; political association; sexual orientation or practices; health information.

De-identified information - information which is no longer about an identifiable individual or an individual who is reasonably identifiable

Direct Marketing – involves the use or disclosure of personal information to communicate directly with an individual to promote goods or services.

Individual – a natural person (CRT Staff, students, associates, and stakeholders)

Personal information – information or an opinion about an identified individual, or an individual who is reasonably identifiable; whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not

Primary purpose – use or disclosure of personal information for a purpose for which it was collected

Secondary purpose – where use or disclosure of personal information is an exception to the primary purpose or; is connected to or associated with the primary purpose

4 References

[Australian Privacy Principles \(APP\)](#)

[Freedom of Information Act 1982](#)

[Privacy Act 1988](#)

[Privacy Amendment \(Enhancing Privacy Protection\) Act 2012](#)

[AVETMISS Collection Protocols](#)

[Spam Act 2003](#)

[National VET Data Policy](#)

[Office of the Australian Information Commissioner](#)

Marketing, Advertising and Communications Policy and Procedure ([MK002P](#))

5 Documentation

Privacy Notice and Student Declaration

VET Data Use Statement

6 Responsibilities

Responsible Director	Organisational Services
Responsible Officer for implementation and monitoring	Manager Planning and Quality
Approved by	Director Organisational Services
Endorsed by	N/A

7 Revision History *(Planning and Quality Use Only)*

Issue number	Review date	Amendment details
1.1	07/07/2022	Scheduled review, minor changes to ensure all Australian Privacy Principles were covered