

**NMA**

**/ TRAINING  
ACADEMY**

**PRIVACY POLICY**



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# Privacy

## Policy and purpose

The purpose of this policy is to provide information regarding the protection and privacy of client/staff personal information that MA Training Academy collects, stores and administers.

This document outlines MA Training Academy's commitment towards protecting all individuals who interact with any aspect of our business and will handle personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

This policy applies to personal information collected by MA Training Academy in relation to past and present staff, students, prospective students, individual clients and other individuals.

This policy must be observed by all staff, consultants, external contractors and students who have access to personal information held by MA Training Academy.

## Definitions

Under the Privacy Act 1988 and Australian Privacy Principles, personal and sensitive information is defined as follows:

- Personal information: "information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not."
- Sensitive information: "(a) information or an opinion about an individual's: (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 preferences or practices, or (ix) criminal record, that is also personal information; or (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for automated biometric verification or biometric identification; or (e) biometric templates".

Unique student identifier (USI) is a unique reference number issued to an individual by the Australian Government. It is made up of numbers and letters and enables an individual to look up and track their training achievements in an online database.

Victorian Student Number (VSN) is a nine-digit student identification number that will be assigned by the Department of Education and Early Childhood Development to all students in government and non-government schools, and students up to the age of 25 in Vocational Education and Training (VET) institutions.



## Authority to collect and store information

The Australian Skills Quality Authority (ASQA) has recognised MA Training Academy as a Registered Training Organisation. The National Vocational Education and Training Regulator Act of 2011 authorises the issuance of this registration. MA Training Academy is required by law to gather personal and sensitive information from its students. This requirement is stated in the National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020, which is one of five legal instruments that MA Training Academy must comply with to be registered.

The Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) requires MA Training Academy to gather data from students in compliance with the data provision standards. This is a complicated data standard that specifies who the student is, where the training is provided, and what they are studying. MA Training Academy is required under the Standards for Registered Training Organisations 2015 to keep and save this information for up to 30 years, as well as to report training activity to government agencies in compliance with mandatory reporting requirements.

These regulations combine to create a statutory requirement to collect, preserve, and disclose information on any student enrolled in nationally accredited training. The publications mentioned in this section are available on the ASQA website.

MA Training Academy will ensure students are aware of how their information is collected, used or disclosed via provision of our **Privacy Notice**. Our privacy notice is included in our student handbook and provided to students upon enrolment.

## Collection and use

MA Training Academy collects personal information that is reasonably necessary for or directly relevant to the delivery of the services it provides, either directly or indirectly. Some of the data gathered may be classified as "sensitive" under the Privacy Act. In general, the types of personal information gathered and the objectives for which it is collected are as follows:

### Solicited information

As part of our day-to-day operations, we collect contact information such as name, organisation, position, address, phone, and email for marketing, support services, mandatory reporting, and engaging with stakeholders.

In addition to information gathered during training activities, MA Training Academy will collect, keep, and report data from satisfaction surveys, complaint management, and information on our client employers.

Employees' names, addresses, phone numbers, emergency contact information, bank account information, and other employment-related information are gathered for human resource management. This policy governs the handling of personal information about employees.

## Collection methods

The AVETMIS Standard mandates the collection of personal and sensitive information about students, as well as information on training activities. This information is collected directly from our students via paper or electronic enrolment forms, as well as other administrative forms such as complaint forms, recognition applications, refund requests, transfer applications, and so on. Much of this data is entered into our "Student management system", which is our student management software. Hard copies of records are scanned and kept in our student files.

Our Employer and Learner Satisfaction Surveys, which are available in both paper copy and electronic format, are used to collect survey results. These survey findings are returned to the main office and entered into the "Student Management System", or automatically entered if issued in electronic format, in our survey analysis software. Once entered into the Student Management System, survey forms are either destroyed or permanently removed if they are in hard copy.

Individuals who request data via phone, email, in person, or on our website supply us with enquiry information, potential student details, including personal contact information.

Employees at MA Training Academy were required to disclose personal information when they first started working.

## Sensitive information

Personal information collected by MA Training Academy that may be regarded as 'sensitive' under the Privacy Act includes:

- 'Disability' and 'long-term impairment status' (health); and 'indigenous status', 'language spoken at home', 'proficiency in spoken English', 'country of birth' (implies ethnic/racial origin). This information is specified in the AVETMISS data elements and is collected for the national VET data collections, national VET surveys, and may be collected for VET-related research.
- 'Dietary requirements' (health-related) are collected for event catering purposes only.
- Biographical information, which may contain information on 'affiliations' and 'membership of a professional or trade association' are obtained from keynote speakers for event marketing purposes.
- 'Memberships of professional associations' and 'health and work injury information' is collected from MA Training Academy employees for HR management purposes.

## Direct marketing

Individuals' right not to receive marketing material is respected by MA Training Academy, which gives an option to unsubscribe from receiving marketing material in its communications and on its website. MA Training Academy follows Australian Privacy Principle 7 (Direct marketing), the Spam Act 2003 (in respect of electronic communications), and the Do Not Call Register Act 2006 in its marketing communications and dissemination of service information. MA Training Academy, on the other hand, does not 'cold call' to market its products and services.

## Google Analytics and cookies

Google Analytics is a Google Inc.-provided web service. Cookies are used to collect information about how people use a website. The cookies, which contain IP addresses, are sent to and stored on Google servers, where they are used to create web usage statistics. When needed by law or for data processing on Google's behalf, Google may share this information with third parties. Google will not link IP addresses to any other information it collects. For more information on Google's privacy policy refer to the link below.

<https://www.google.com.au/intl/en/policies/privacy/>

It is possible to disable cookies and opt-out of Google Analytics (<https://tools.google.com/dlpage/gaoptout>) by adjusting web browser settings. However, doing so may have an impact on the website's functionality.

The MA Training Academy web servers log information such as the server address, the date and time of the visit, and the web pages browsed automatically. There is no personal information stored. These logs are used to monitor and improve the website.

## Unsolicited personal information

If MA Training Academy should receive unsolicited personal information, it will be treated and managed according to the Australian Privacy Principles.

## Notification of collection

MA Training Academy aims to inform individuals before, at the time of, or as soon as feasible following the collection of their personal information. Notifications are often written, but they can also be vocal in the case of telephone help-desk services or research conducted by telephone interview.

- Marketing - notice is provided on our website. Individuals are also notified when personal information is collected for events. All MA Training Academy marketing messages include a privacy notice.
- Quality Indicator Surveys - notification is included in the invitation letter to participate in the surveys as well as at the time of data collection (online or by telephone).
- MA Training Academy employees - Employees are notified when their job begins.

## Disclosure of personal information

MA Training Academy does not release personal information unless an individual has consented to a secondary purpose, or an individual would reasonably expect it (such as receiving emails about upcoming events), or if required by law.

In accordance with Commonwealth contractual obligations, MA Training Academy may disclose personal information with the Commonwealth government. In certain cases, MA Training Academy will take all reasonable means to notify and obtain consent from the individuals affected, as well as to guarantee that the recipient handles personal information in accordance with the APPs.

For marketing purposes, MA Training Academy does not sell its mailing lists to third parties.



MA Training Academy does not provide personal information to recipients overseas. While our website's content is accessible to people all over the world, no statistical or research publications contain personally identifiable information.

## Management of personal information

MA Training Academy endeavours to collect, use, and disclose accurate personal information, up to date, complete, and relevant. MA Training Academy keeps its customer relationship management system up to date regularly. In addition, we check with stakeholders regularly to see whether their personal contact information has changed.

## Access to and correction of personal information

Individuals may seek access to and correction of their personal information obtained directly from them by MA Training Academy, subject to the exceptions prescribed by the Australian Privacy Principles.

There are no fees associated with gaining access to or changing personal information at MA Training Academy.

Written requests for access to or correction of personal information are required. Within 14 business days, you will receive a response to your request.

## Information retention and disposal

Personal information is held in electronic and/or paper format:

- Information collected from student enrolment applications and survey responses is held in databases.
- Names and contact details of stakeholders are held in the student management system and email contact lists.
- Names and contact details collected during the delivery of services may be held either in electronic form in MA Training Academy's document management system or in paper documents that are locked in cupboards and filing cabinets.
- Personal staff information is held in the student management system and HR management, payroll database.
- Backup copies of all electronic files held in MA Training Academy's systems are kept in the event of system failure/loss. All backup copies of system files are secured.

Personal information is stored at MA Training Academy for 30 years. MA Training Academy destroys personal information when it is no longer needed for MA Training Academy's business purposes and it is legal to do so.

## Information security

MA Training Academy takes active steps to protect personal information from unauthorised access, modification, or disclosure, as well as from misuse, interference, and loss.



- Using appropriate technology, MA Training Academy's systems and internal network are safeguarded from unauthorised access. Secure Socket Level (SSL) protocol protects the majority of system data sent over the internet. The inherent risks of data transfer over the internet, on the other hand, are widely known. Individuals who do not want to disclose their personal information through the online website forms can send it to MA Training Academy by mail.
- User log-on and passwords, as well as the assignment of user access rights, protect access to the student management system and learning management system.
- Third-party providers used by MA Training Academy for the delivery of services are all located in Australia and are required to comply with the Australian Privacy Principles and provide appropriate safeguards to protect personal information.
- MA Training Academy's premises and data storage systems are fully secured. When working with personal information, MA Training Academy follows a clean-desk policy and secures workstations. Paper documents including names and addresses must be kept secure and shredded when they are discarded. Before disposal, all hardware is properly 'sanitized.'

## Complaints and concerns

Complaints or concerns about MA Training Academy's management of personal information should be directed in writing to MA Training Academy's Chief Executive Officer. MA Training Academy will respond in writing within 14 business days.



## Version Control

Version No.	Date Reviewed	Approved By	Summary of Changes	Next Reviewed
1.0	31/01/2022	Fiona McLean, General Manager	Change of Management and documents created.	31/01/2023