NUMBER : POL007_09  PAGES : 10

VERSION : V4.0  CREATED : July 2009
LAST MODIFIED : 01/04/2015  REVISION DATE : 01/04/2016

DOCUMENTS : Authority to Exchange Information
Media Authority - Student

REFERENCES : Student Handbook
Records Management & Control
Record Retention Guide
Access, Equity & Fairness
IT, Internet and Email
Confidentiality & Non-Disclosure
Privacy including ICT
Privacy Act 1988
Australian Privacy Principles
VET Quality Framework
Standards for Registered Training Organisations (RTOs) 2015 Cwth.
National Vocational Education and Training Regulator Act 2011
Education Services for Overseas Students Act 2000
National Code of Practice for Registration Authorities and Providers of
Education and Training to Overseas Students 2007

AUTHORISED : [Signature]
MANAGING DIRECTOR

DATE : 28 May 2015
Contents

PURPOSE .......................................................................................................................................... 3

APPLICABLE STANDARDS .............................................................................................................. 9

Standards for Registered Training Organisations 2015 – Domestic Students ......................................... 9

Standard 8 – The RTO Cooperates with the VET Regulator & is Legally Compliant at all Times......................... 9

Clauses 8.5 – 8.6 - Comply with all relevant legal requirements.................................................................. 9

Clause 8.5 ............................................................................................................................................... 9

Clause 8.6 ............................................................................................................................................... 9

Standards for Registered Training Organisations 2015 – International Students ................................. 9

The National Code and its purpose ........................................................................................................... 9

Compliance with the standards for registered providers ........................................................................ 10

POLICY .............................................................................................................................................. 3

DEFINITION ....................................................................................................................................... 3

SCOPE ............................................................................................................................................... 4

PROCEDURE ..................................................................................................................................... 4

Protecting Personal Information ............................................................................................................. 4

Collection, Use and Disclosure of Personal Information ............................................................................. 4

Web links ............................................................................................................................................... 5

Changes to our Privacy Statement ............................................................................................................ 5

Feedback ................................................................................................................................................ 5

Privacy Policy Explanations ...................................................................................................................... 5

Privacy Statements addressing the Australian Privacy Act 198- Privacy Amendment (Enhancing Privacy Protection) Act 2012 ......................................................................................................................... 5

Collection of Personal Information ......................................................................................................... 5

Using and Disclosing Your Personal Information ....................................................................................... 6

Security of Your Personal Information ...................................................................................................... 7

Access to Your Personal Information and Complaints Procedure ............................................................... 7

DURATION ......................................................................................................................................... 8

ADDITIONAL INFORMATION ............................................................................................................ 8

COMPLAINTS/CONCERNS ............................................................................................................... 8

RESPONSIBILITIES .......................................................................................................................... 9

Operations Director ................................................................................................................................. 9

Employees ............................................................................................................................................... 9

Students and Other Non Employee Stakeholders ....................................................................................... 9
PURPOSE

The purpose of the Privacy Policy is to ensure that all 4Life Pty Ltd (4Life) staff, students & other stakeholders are aware of the legalities and responsibilities attached to the Privacy Act 1988 - Privacy Amendment (Enhancing Privacy Protection) Act 2012 and principles and the consequences of not adhering to the requirements; and

POLICY

It is the policy of 4Life to:

- assure the privacy of our staff, students and stakeholders at all times.
- gain written authority from staff, students & trainees and stakeholders for the sharing or dissemination of information directly related to the provision of its services;

The only exception to privacy is a requirement by law to release information.

DEFINITION

Access and Equity

Refers to the policies, procedures and approaches that ensure that 4Life’ training programs are responsive to the diverse needs of all employees, students and other stakeholders.

Being accessible and equitable means ensuring that people with differing needs and abilities have the same opportunities to successfully gain skills, knowledge and experience through education and training irrespective of their age, disability, colour, race, gender, religion, sexuality, family responsibilities, or location.

It includes:

- Providing and promoting non-discriminatory, inclusive practices and processes; and
- Ensuring equal opportunities for all students to achieve their learning outcomes through reasonable adjustment of services, learning and assessment; and
- Commitment to treating all students or prospective students fairly.

Appeal

An appeal arises when a stakeholder is not satisfied with a decision taken by 4Life.

Contractor

Individual or entity engaged by 4Life under contract to deliver specified work on its behalf e.g. Sessional trainer/assessor.

Employee

Person employed by 4Life on a full or part time or casual basis. Does not include Contractors.

International Student Support Officer

The ISSOs are the Operations Director in South Australia and General Manager in NSW and their role is to provide and/or facilitate appropriate support services for international students.
SCOPE

This policy covers all employee, student and stakeholder records and information collected and/or stored by 4Life.

PROCEDURE

Protecting Personal Information

4Life is committed to managing and protecting the personal information (such as name, address, date of birth, personal email address, etc) that all stakeholders share with us.

Implementation of this policy ensures that all stakeholders will have confidence that all personal information provided to 4Life is solely used by the organisation within the guidelines of the Privacy Act 1988 - Privacy Amendment (Enhancing Privacy Protection) Act 2012 as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Act 1988) and in an ethical and sensitive manner.

Collection, Use and Disclosure of Personal Information

Persons using our websites may do so aware that the sites do not collect information of a personal nature from such visits.

Information submitted digitally to our organisation (i.e. electronic data, using an electronic form or application or by sending an email) is collected and used for the nominated purpose only.

4Life may also use personal information to manage our relationship with the individual stakeholder.

4Life acknowledges that individuals provide personal information to it on a voluntary basis to assist us to administer and provide quality service and outcomes on their behalf.

4Life will use contact details to assist in the administration of its services.

4Life will not disclose personal information to an external company or third party without prior written permission from the individual. An instance where this may apply is where a student or trainee or potential student or trainee is in a placement with a Host or Work Experience Employer.

Personal information will not be sold to anyone and will not be used for promotions independent of 4Life.

If there is no longer any legitimate purpose for retaining personal information, and within Records Management Legislative compliance, it will be securely destroyed.

Examples of personal information 4Life may hold are:

<table>
<thead>
<tr>
<th>Name</th>
<th>Language spoken at home</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td>Email address</td>
</tr>
<tr>
<td>Telephone Number</td>
<td>Photograph</td>
</tr>
<tr>
<td>Fax Numbers</td>
<td>Apprentice Results</td>
</tr>
<tr>
<td>Date of birth/age</td>
<td>Educational Qualifications</td>
</tr>
<tr>
<td>Place of birth</td>
<td>Support services</td>
</tr>
<tr>
<td>Ethnic origin</td>
<td></td>
</tr>
</tbody>
</table>
Web links

Persons visiting 4Life's web site are able to access various other sites by clicking on links that our organisation embeds within its site. Stakeholders should be aware that other sites may not be subject to the same privacy standards and procedures.

Changes to our Privacy Statement

This information relates to 4Life's current privacy policy and standards. 4Life may vary its privacy standards from time to time. 4Life will make public statements of any changes by publishing them on its website, www.4Lifecollege.com.au, or via written notification to our stakeholders.

Feedback

If you have any comments regarding 4Life's privacy statement and policy please advise us via email at info@4Lifecollege.edu.au or surface mail to Suite 9, 311 Glen Osmond Road, Glenunga SA 5064

Privacy Policy Explanations

4Life is committed to complying with the Australian Privacy Principles as set out in the Commonwealth of Australia Privacy Act 1988 - Privacy Amendment (Enhancing Privacy Protection) Act 2012 and any and all following amendments (Privacy Act 1988).

In compliance with the Privacy Act 1988- Privacy Amendment (Enhancing Privacy Protection) Act 2012, the following explanation has been developed detailing how 4Life will meet the minimum standards for the collection, use and disclosure of personal information.

Privacy Statements addressing the Australian Privacy Act 198- Privacy Amendment (Enhancing Privacy Protection) Act 2012.

1.1. 4Life respects your privacy and is committed to protecting your personal information. Our privacy policy outlines how we collect and manage, use and protect your personal information. It also sets out your rights in relation to accessing the personal information we collect and hold about you. We are bound by the Australian Privacy Principles (APP’s) in the Privacy Act 1988 - Privacy Amendment (Enhancing Privacy Protection) Act 2012.

1.2. Personal information is defined in the Privacy Act 1988 - Privacy Amendment (Enhancing Privacy Protection) Act 2012 and means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

1.3. Our Website may contain links to third party websites such as "Facebook". We are not responsible for the privacy policies of any third party websites. We recommend that you review the privacy policy of each website you visit.

Collection of Personal Information

2.1. 4Life only collects personal information for the purposes of conducting our business as an online retailer and trader. The personal information we collect from you will include information you give us when you:

   (a) register or subscribe to our Website;

   (b) complete a transaction with us; and

   (c) contact us.
2.2. The personal information that we collect on individuals may include, but is not limited to:

   (a) your name;

   (b) your contact details including your email, home address and billing address;

   (c) your payment details; and

   (d) other personal information that we collect in the course of a transaction or that you provide to us when you contact us.

2.3. We may collect personal information from individuals who are not customers of our business but whose personal information is given to us by those individuals via our Website or in the course of a transaction.

2.4. Where reasonably practicable, we attempt to collect information directly from individuals. When we collect information, we will generally explain to the individual why we are collecting it, who we give it to and how we will use or disclose it or, alternatively, those matters will be obvious from the circumstances.

2.5. If we collect information about an individual from someone else, we will take reasonable steps to ensure that the individual is made aware of the matters listed in clause 2.4.

2.6. We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.

2.7. When you visit our Website, we, and/or third parties, may place cookies on your browser to enhance and manage our website and improve our business and the services we provide to you. By using the website and agreeing to this policy, you grant us permission to place and store cookies on your browser. Cookies may be used by us to collect the following information:

   (a) your computer's operating system;

   (b) your computer's browser type and capabilities;

   (c) your computer's Internet Protocol (IP) address and geolocation;

   (d) web pages visited, including how you were referred to each web page; and

   (e) web page usage statistics, including the time spent on each web page.

Cookies can be managed by accessing the individual settings in your browser.

2.8. We will not identify users or their browsing activities, except where required by law.

**Using and Disclosing Your Personal Information**

3.1. We will generally use or disclose your personal information only for the primary purpose for which it was collected; or for a related secondary purpose where you would reasonably expect us to use or disclose the personal information for that secondary purpose. We may otherwise use and disclose your personal information if you have given us consent for the use or disclosure or it is required or authorised by law.

3.2. Generally, we use and disclose your personal information for the purpose of providing you with the goods or services that you have requested, or otherwise to enable us to carry out our business as an online retailer of goods and services.
3.3. If those purposes for which we have collected the information involve providing personal information about an individual to any third party, we will take appropriate and reasonable steps to ensure any personal information is protected.

3.4. We will generally only use personal information for cold call marketing if you have given express or implied consent.

3.5. When enrolling with 4Life, you consent to 4Life using your personal information, such as your email address, for direct contact purposes. This includes sending you emails about your academic progress, compliance with study requirements or offers for further courses and services. You are obligated to have an You may opt out of receiving direct marketing communications at any time. Our electronic marketing activities will comply with the requirements of the Spam Act 2003 (Commonwealth).

3.6. We may share your information with other organisations when we are required to do so. This includes Department of Further Education, Employment and Training (DFEEST), Australian Skills Qualifications Authority (ASQA), National Centre for Vocational Education Research (NCVER).

Security of Your Personal Information

4.1. We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. When no longer required, personal information is destroyed in a secure manner or deleted.

4.2. Some of the security measures we use include:

4.2.1. Firewalls and access logging tools that protect against unauthorised access to your data and our network.

4.2.2. Secure work environments and workflow systems that prevent unauthorised access and copying of your personal information.

4.2.3. Secure server and closed network environments.

4.2.4. Virus scanning tools.

4.2.5. Management of access privileges, to ensure that only those who really need it can see your personal information.

4.2.6. Ongoing training and security reviews.

4.3. We will maintain every effort to protect your personal information from inappropriate access and use.

Access to Your Personal Information and Complaints Procedure

5.1. Under the Privacy Act 1988 Privacy Amendment (Enhancing Privacy Protection) Act 2012, you have certain rights to access the personal information we collect and hold about you.

5.2. Generally, subject to the exceptions of APP 12.3, we will allow you access to the personal information we hold about you within a reasonable time after it is requested. When requesting such access please identify the precise type/s of information requested. You may make a request by contacting our Operations Director on info@4Lifecollege.edu.au or by writing to us at: Privacy Inquiries, 4Life, Suite 9, 311 Glen Osmond Road, Glenunga SA 5064.

5.3. We take reasonable steps to ensure that the personal information that we collect, use and disclose is accurate, up to date and complete. Where an individual requests to
correct information, we will take reasonable steps to correct the information, having regard to the purpose for which it is held. You may lodge a request to correct personal information in the manner outlined in clause 5.2 above.

5.4. To make a complaint about a breach of the Australian Privacy Principles, which includes how we handle your personal information, you can contact our Operations Director or write to us at the address provided in clause 5.2 above. We will try to respond to your complaint within a reasonable time after it is received. If you are not satisfied by our response, you may acquire further information regarding privacy from the Office of the Australian Information Commissioner.

DURATION

4Life is required by law to retain all records applicable to a person's learning/training for a period of 30 years. These will be archived 24 months after completion of the accredited course or qualification.

If 4Life ceases operation as an RTO:

- In the event that a new owner takes over 4Life:
  - The new owner will have to meet the VQF registration standards including those meeting Privacy and Records Management.
  - 4Life will place a notice in the Advertiser (or its equivalent at the time).
  - The new owner will take responsibility for the archiving and access of those records.

Under various other statutes of limitations 4Life is required to keep corporate, administrative, financial records for a minimum period of 7 years.

ADDITIONAL INFORMATION

If you have any queries about the privacy and security practices for 4Life, please contact the Operations Director.

COMPLAINTS/CONCERNS

If you believe that your personal information has not been dealt with in accordance with an information privacy principle you may make a written complaint to 4Life. Your complaint should be addressed to:

Operations Director
4Life
Suite 9, 311 Glen Osmond Road
Glenunga South Australia 5064

Or via email to: info@4Lifecollege.edu.au

Please refer to the 4Life Complaints Policy.

Where you are unhappy with 4Life’s Complaints process in relation to Privacy you should contact the Office of the Australian Information Commissioner.
RESPONSIBILITIES

Operations Director

It is the overall responsibility of the Operations Director to ensure that the Privacy Policy is accessible to all stakeholders and that all staff are appropriately trained to comply with this policy.

It is the responsibility of the Operations Director to ensure that appropriate training in Privacy issues is delivered to all staff.

It is the responsibility of the Operations Director to ensure that all relevant Managers and Senior Staff are aware of all updates in Privacy Legislation and Regulations.

It is the responsibility of the Operations Director to ensure that all employees are conversant and understanding of the requirements of the Privacy Policy and Privacy Act 1988 - Privacy Amendment (Enhancing Privacy Protection) Act 2012

Employees

It is the responsibility of staff to ensure that their behaviour aligns fully with the Privacy Policy and Privacy Act 1988 - Privacy Amendment (Enhancing Privacy Protection) Act 2012 at all times and that any breach of the policy or Act is reported immediately to the Operations Director.

Students and Other Non Employee Stakeholders

It is the responsibility of students and non employee stakeholders to ensure that they do not breach privacy relating to other students, stakeholders and 4Life.

APPLICABLE STANDARDS

Standards for Registered Training Organisations 2015 – Domestic Students

Made under the National Vocational Education and Training Regulator Act 2011:

Standard 8 – The RTO Cooperates with the VET Regulator & is Legally Compliant at all Times

Clauses 8.5 – 8.6 - Comply with all relevant legal requirements

Clause 8.5

The RTO complies with Commonwealth, State and Territory legislation and regulatory requirements relevant to its operations.

Clause 8.6

The RTO ensures its staff and clients are informed of any changes to legislative and regulatory requirements that affect the services delivered.

Standards for Registered Training Organisations 2015 – International Students

Made under the Education Services for Overseas Students Act 2000:

The National Code and its purpose

1.1 The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (the National Code) provides nationally consistent standards for the conduct of registered providers and the registration of their courses. The standards set out specifications and procedures to ensure that registered
providers of education and training courses can clearly understand and comply with their obligations under the National Code.

The National Code also identifies the roles and responsibilities of the Australian Government and state and territory governments in discharging their regulatory functions.

**Compliance with the standards for registered providers**

Compliance with the National Code by registered providers is assessed at the point of registration. Compliance of registered providers, other than registered self-accrediting providers, is assessed during the period of registration by either the designated authority or DEST – see Part B for a description of the respective roles of the state and territory governments (through the designated authority) and the Australian Government (through DEST).

Compliance with the National Code by registered providers which are self-accrediting, is assessed through an annual declaration of conformity with the National Code and, once every five years, an independent external audit report. The designated authority or DEST may still undertake compliance visits to registered self-accrediting providers in the event that the designated authority or DEST deem this necessary.

**NOTE:**

*DEST is now the Department of Education & Training (DET)*

*DIAC is now the Department of Immigration & Border Protection (DIBP)*