Privacy Policy (VET)

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Approved By: Audit and Risk Committee
Policy Owner: Quality and Compliance Manager
Policy Area: VET
Audience: Public

1. Purpose

This policy outlines Stanley College's processes to ensure the privacy of personal information of students at Stanley College.

2. Scope

This policy applies to all students at Stanley College and staff that handle student data.

3. Key Definitions

DoHA	The Department of Home Affairs
Education Agent	A person or organisation (in or outside Australia) that recruits overseas students and refers them to education providers. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to education providers. Education agent does not refer to an education institution with whom an Australian provider has an agreement for the provision of education (that is teaching activities).
Personal Information	Personal information on Stanley College staff and students, which may include, but is not limited to: • assignments • examinations • student results • identity documentation • financial information.
PRISMS	Provider Registration and International Students Management System: the Australian Government database that provides Australian education providers with Confirmation of Enrolment facilities required for compliance with the ESOS legislation.
Third Party	Any party that provides services on behalf of Stanley College but does not include a contract of employment between Stanley College and its employee.

4. Policy Principles

As a Registered Training Organisation, Stanley College acquires, holds, uses or communicates personal information relating to student. At all times, Stanley College will treat this information with the highest standards of confidentiality and privacy. Personal information will only be used for the purposes for which it has been disclosed to the College.

As a registered training organisation, Stanley College must comply with all applicable Commonwealth, State and Territory laws, including, for example, by ensuring:

- personal information is collected, used and disclosed by Stanley College in accordance with all applicable privacy laws; and
- Stanley College complies with all applicable requirements under the Student Identifiers Act 2014.

Stanley College will not disclose personal information to any third party without the person's express consent, unless required to do so by law.

Information collected, as part of the admissions process may include a person's:

- Name;
- Address;
- Contact details (including residential and telephone number/s);
- Emergency contact details;
- Date of birth;
- Gender;
- Country of birth;
- Language spoken at home;
- Level of English spoken;
- Disability information;
- Highest secondary schooling completed;
- Other qualifications completed;
- Current employment status; and
- Indigenous status.

4.1 Stanley College Privacy Notice

Information requested from students is as required by AVETMISS VET Provider Collection Specifications. The Application Form completed by students contains Stanley College's Privacy Notice which consists of the following:

- Stanley College Privacy Notice;
- Unique Student Identifier (USI) Privacy Notice.

The Privacy Notice and this policy are both available on the Stanley College website at the following link:

- https://www.stanleycollege.edu.au/studying-with-us/policies-and-procedures/

The Privacy notice is included as part of this policy in *Appendix 1 – Stanley College Privacy Notice*.

4.2 **Agents, Contractors and Other Third Parties**

Our agents, contractors and other third parties, who require personal information to provide a legitimate service, are also bound by these terms of privacy to ensure that all client and participants personal information remains protected at all times.

4.3 **Overseas access and handling of personal information**

Stanley College operates an office in the Philippines that handles various administrative support tasks, such as student administration, enrolment processing, compliance, finance, reporting, IT support, and student services. For this reason, Stanley College staff at office locations in Australia and the Philippines may handle your personal information as part of their official responsibilities, for internal purposes and to fulfill the purpose for which the personal information was collected (or a related or ancillary purpose).

The College undertakes appropriate measures to ensure that personal information that may be transferred, stored or managed overseas is handled in compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

If the College discloses personal information to an overseas recipient without your consent, the College will take reasonable steps to ensure that this recipient does not breach the Australian Privacy Principles or a similar applicable law with respect to that information.

4.4 **Use of Internet**

The internet, including emails, may be used to transmit client and participants personal information to authorised persons. Security of data transmitted to state and territory registering bodies is managed by the respective bodies and Stanley College have taken all reasonable steps to protect and secure personal information when using the internet.

4.5 **Data Quality**

Stanley College will ensure that personal information is accurate, complete and up-to-date.

Student are encouraged to help the College keep their personal information accurate, complete and up-to-date by contacting the College to inform it of any changes. In addition, Stanley College has a *Student Contact Details Verification Policy (VET)*, which requires Stanley College to contact students regularly to verify their contact details.

4.6 **Collection and Use of Personal Information**

Stanley College collects personal information in a number of ways including:

- directly from students, such as application forms, resumes, the Student Portal, phone or in written correspondence;
- from third parties such as ApprentiCentre and other educational institutions, where consent is provided to relay personal details.

Stanley College uses this information in a number of ways, including to:

- provide information about our courses to prospective students;
- establish and maintain client and participant relationships;
- provide educational and support services to current students;

- administer and manage those services including admission, enrolment, assessments scholarships, billing and collection of fees and charges;
- meet its data provision requirements, required by the National Regulator (ASQA) and the Department of Training and Workforce Development (DTWD);
- review and develop our services; and
- authenticate information provided as part of the College's admissions process.

4.7 **Storage and Security of Personal Information**

The majority of personal information is stored in the student management system, Accounting Software, and/or in student files.

All Stanley College Staff have access to personal information only as required to carry out their duties. They include:

- executive and senior managers;
- academic and administrative staff;
- members of student complaints and appeals committees.

4.8 **Disclosure of Personal Information**

Personal information collected from students is confidential. Stanley College will not disclose any personal information provided except under the following conditions:

- where the student has nominated an authorised representative to act on their behalf;
- to meet government, legal or other regulatory authority requirements e.g. Department of Education, Centrelink, ApprentiCentre, DoHA directly or via PRISMS;
- where there are reasonable grounds to believe that a threat to life or health can be prevented;
- to out-sourced service providers who support Stanley College in providing services to students (for example, mailing houses and debt recovery agencies) and in these cases, the provider agrees to preserve the confidentiality of personal information and to use it only for the purposes of providing that particular service; and
- where the student has provided written approval to provide specific information to a nominated third party including other Registered Training Organisations or approved Education Agents.

4.9 **Accessing and Updating Personal Information - Students**

Providing accurate and up-to-date personal information to Stanley College is the responsibility of the student. In addition, Stanley College has a *Student Contact Details Verification Policy (VET)*, which requires Stanley College to contact students regularly to verify their contact details.

The Stanley College Student Portal provides 24 hour access to personal information and can be accessed from computers on campus, from home or from other off-campus sites (for example, libraries or internet cafes). Access is via a login screen and the student will be required to enter a username and password. Students can update their personal details including contact information via the Student Portal.

Students may also request details of personal information in person, by completing a *Student Request Form*, or via email to the Student Services Team (studentservices@stanleycollege.edu.au).

At all times information will only be provided to the requesting student once their identity has been verified. Access to information must be controlled, and on request, only copies of information held

can be provided to authorised persons. Original documentation cannot be removed by the student or authorised third party.

4.10 Verification of Details Students

Before providing personal student information to students or staff or third parties, Stanley College employees are required to verify the identity of the requesting person and their authority to request information.

Approved ID verification processes include:

- provision of photo ID (including drivers licence, passport or student ID); and
- answering verification questions including date of birth, address, telephone details as well as a specific question relating to the student/employee (for example, the last unit studied or superannuation fund nominated).

4.11 Monitoring

4.11.1 Student Data Provision Requests Third Parties – Compliance Team

All third-party requests for verification or provision of student data held by Stanley College are directed to the VET Compliance Team for review, approval and processing.

Where a request is received to disclose student data to meet *government, legal or other regulatory authority requirements*, the following monitoring applies to these requests. The VET Compliance Team:

- reviews and obtains a copy of the student enrolment form with the applicable declaration signed by the student acknowledging they understand this release of information;
- verifies the requested information and provides the compliance response including any requested data;
- logs the request on the Student Verification/Request Register including of all communications, authorisation and other evidence; and
- where the VET Compliance Team requires further clarification concerning the decision to release the information, written approval from the Chief Executive Officer is required.

Where a request is received to disclose student data to a *private entity*, the following monitoring applies to these requests. The Compliance Team:

- obtains written/signed approval from the student to confirm/release information in the form of the Student Verification Authorisation (SVA) template;
- provides the compliance response to the external party including the requested information;
- logs the request on the Student Verification/Request Register including of all communications, authorisation and other evidence;
- where student authorisation to release information is not provided, student data is not authorised for release.

4.11.2 Student Award Verification Requests Third Parties – Compliance Team

All qualification or statement of attainment (award) verification requests received from external Registered Training Organisations or other external organisations are directed to the VET Compliance Team. The Compliance Team:

- obtains written/signed approval from the student to confirm/release information in the form of the Student Verification Authorisation (SVA) template;

- verifies the requested information concerning the award and provide the compliance response to the external party;
- logs the request on the Student Verification/Request Register including of all communications, authorisation and other evidence;
- where student authorisation to release information is not provided, student data is not authorised for release.

Full details of this ongoing process is detailed in the section titled *Verification of Student Awards/ Certificates* available in the *Awards Issuance Procedure (VET).*

5. Roles and Responsibilities

- **Dean VET / Quality & Compliance Manager:** Oversee the student privacy process and ensure compliance.
- **Compliance Team:** Responsible for monitoring processes and ensuring compliance, including the management/processing of student data requests and verifications.
- **Student Services Team/Admissions Team:** Responsible for collection and management of student data in the student management system.
- **International Recruitment Manager:** Responsible for the management of Education Agents and student data.

6. Policy Information

Policy Area	VET
Authorised Officer	Quality and Compliance Manager
Supporting documents, procedures, work guidelines and forms	Student Contact Details Verification Policy (VET) Student Record Management Policy (VET) Awards Issuance Policy (VET) Student Verification/Request Register Privacy Statement Student Handbook International Student Handbook Local Application Forms Student Request Form Offer Letter International Students
Audience	Public

7. Compliance Monitoring Summary

Overview	Frequency
Incoming student data verification requests are all directed through the VET Compliance Team. Including but not limited to regulator requests **and** student data requests from local/state government and private organisations	Ongoing, daily
Incoming student award verification requests from Registered Training Organisations **and** other private organisations, are all directed through the VET Compliance Team	Ongoing, daily

8. Link to Standards

8.1 Standards for RTOs 2025

Compliance Requirements / Credential Policy	Standards
Compliance Requirements	Section 20. Compliance with laws, including: - a, b

8.2 National Code of Practice 2018

Standard (Number)	Standard (Descriptor)	Standards (Individual)
Standard 3	Formalisation of enrolment and written agreements	3.3.6
Standard 4	Education agents	4.1 to 4.3

Appendix 1 – Stanley College Privacy Notice

Stanley College handles your personal information in accordance with our Privacy Policy (which you can view here: https://www.stanleycollege.edu.au/studying-with-us/policies-and-procedures/. By enrolling with Stanley College, you are acknowledging that you have read and agree to the collection, use and disclosure of your information in accordance with the policy. The Privacy Notice in this form is supplementary to the Stanley College Privacy Policy.

Why we collect your personal information

As a registered training organisation (RTO), we collect your personal information so we can process and manage your enrolment in a vocational education and training (VET) course with us.

How we use your personal information

We use your personal information to enable us to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO.

How we disclose your personal information

We are required by law (under the National Vocational Education and Training Regulator Act 2011 (Cth) (NVETR Act)) to disclose the personal information we collect about you to the National VET Data Collection kept by the National Centre for Vocational Education Research Ltd (NCVER). The NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector.

We are also authorised by law (under the NVETR Act) to disclose your personal information to the relevant state or territory training authority.

How the NCVER and other bodies handle your personal information

The NCVER will collect, hold, use and disclose your personal information in accordance with the law, including the Privacy Act 1988 (Cth) (Privacy Act) and the NVETR Act. Your personal information may be used and disclosed by NCVER for purposes that include populating authenticated VET transcripts; administration of VET; facilitation of statistics and research relating to education, including surveys and data linkage; and understanding the VET market.

The NCVER is authorised to disclose information to the Australian Government Department of Employment and Workplace Relations (DEWR), Commonwealth authorities, State and Territory authorities (other than registered training organisations) that deal with matters relating to VET and VET regulators for the purposes of those bodies, including to enable:

- administration of VET, including program administration, regulation, monitoring and evaluation;
- facilitation of statistics and research relating to education, including surveys and data linkage; and
- understanding how the VET market operates, for policy, workforce planning and consumer information.

The NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf. The NCVER does not intend to disclose your personal information to any overseas recipients.

For more information about how the NCVER will handle your personal information please refer to the NCVER's Privacy Policy at www.ncver.edu.au/privacy.

If you would like to seek access to or correct your information, in the first instance, please contact your RTO using the contact details listed below.

DEWR is authorised by law, including the Privacy Act and the NVETR Act, to collect, use and disclose your personal information to fulfil specified functions and activities. For more information about how the DEWR will handle your personal information, please refer to the DEWR VET Privacy Notice at https://www.dewr.gov.au/national-vet-data/vet-privacy-notice.

Surveys

You may receive a student survey which may be run by a government department or an NCVER employee, agent, third-party contractor or another authorised agency. Please note you may opt out of the survey at the time of being contacted.

Contact information

At any time, you may contact Stanley College to:

- request access to your personal information
- correct your personal information
- make a complaint about how your personal information has been handled
- ask a question about this Privacy Notice

Overseas access and handling of personal information

Stanley College operates an office in the Philippines that handles various administrative support tasks, such as student administration, enrolment processing, compliance, finance, reporting, IT support, and student services. For this reason, Stanley College staff at office locations in Australia and the Philippines may handle your personal information as part of their official responsibilities, for internal purposes and to fulfill the purpose for which the personal information was collected (or a related or ancillary purpose).

The College undertakes appropriate measures to ensure that personal information that may be transferred, stored or managed overseas is handled in compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

If the College discloses personal information to an overseas recipient without your consent, the College will take reasonable steps to ensure that this recipient does not breach the Australian Privacy Principles or a similar applicable law with respect to that information.

USI Privacy Notice

The Office of the Student Identifiers Registrar's privacy obligations require **Stanley College** to:

- be open and transparent about how we hold, use and disclose personal information;
- have a privacy policy in place that is reasonably available to the public;
- take reasonable steps to ensure the security of personal information and protect it against intentional or unintentional misuse, loss, interference, unauthorised access, modification or disclosure; and

- take reasonable steps to ensure the personal information that is held, used or disclosed is accurate, up to date, complete and relevant.

Stanley College is committed to ensuring the proper handling of your personal information in accordance with the Privacy Act 1988 ('Privacy Act'). **Stanley College** is an 'APP entity' that must comply with the Australian Privacy Principles (APPs) which are set out in Schedule 1 of the Privacy Act. The Privacy Act and APPs regulates how **Stanley College** must collect, use, disclose and hold personal information, and how people may access and correct their personal information.

The information you provide through the USI application process is collected by the Student Identifiers Registrar for the purposes of:

- processing your application for a USI,
- verifying and providing a USI,
- resolving problems with a USI and creating authenticated Vocational Education & Training (VET) transcripts.

The information may be disclosed to:

- a number of organisations, departments, regulators and other persons where it is reasonably necessary for the purposes of performing functions or exercising powers.
- the Oversight Authority in instances pertaining to digital identity to enable them to perform their functions.
- current and former registered education and training providers to:
    - enable them to deliver VET and Higher Education courses;
    - meet their reporting obligations under the VET and Higher Education standards and government contracts; and
    - assist in determining eligibility for training subsidies and higher education funding.
- schools for the purposes of delivering VET courses to you and reporting on these courses.
- the National Centre for Vocational Education Research (NCVER) for the purpose of:
    - creating authenticated VET transcripts;
    - resolving problems with USIs; and
    - collecting, preparing and auditing national VET statistics.
- researchers for education and training related research purposes.
- any other person or agency that may be authorised or required by law to access the information.
- any entity contractually engaged by the Student Identifiers Registrar to assist in the performance of his or her functions in the administration of the USI system and will not otherwise be disclosed without their consent unless authorised or required by or under law.

Detailed information on the use of your information can be found in Division 5 - Collection, use or disclosure of student identifiers of the Student Identifiers Act 2014, and in the USI's Privacy Policy.

Your personal information and the USI application process

The USI application process requires personal information, including your:

- name;
- date and place of birth;
- gender;
- contact details; and
- identification documents.

This information is used to confirm your identity and ensure your USI is unique. The USI Registry System only keeps information about your name, date and place of birth, gender, contact details and the type of identification provided. The USI Registry System doesn't retain details from the ID used to create your USI. If you've authorised Stanley College to create a USI on your behalf, Stanley College is required by law to destroy your personal information as soon as possible after making the USI application.

USI VET transcripts

For USI account holders who are undertaking VET studies, the National Centre for Vocational Education and Research (NCVER) holds your training information, which is used to electronically create authenticated VET transcripts.

The Office of the Student Identifiers Registrar does not hold or store the information received from NCVER for this purpose. NCVER is authorised to disclose information to the:

- Australian Government Department of Employment and Workplace Relations (DEWR)
- Commonwealth authorities and State and Territory authorities (other than registered training organisations) that deal with matters relating to VET and VET regulator

For the purposes of:

- the administration of VET, including program administration, regulation, monitoring and evaluation
- the facilitation of research relating to education, including surveys and data linkage
- understanding how the VET market operates, for policy, workforce planning and consumer information.

NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf. NCVER does not intend to disclose your personal information to any overseas recipients. For more information about how NCVER will handle your personal information please refer to NCVER's Privacy Policy.