

PURPOSE

Academia (RTO #45593) is committed to protecting the privacy of individuals' personal information.

It is our obligation to ensure all personal information is handled in a fair, transparent, and responsible manner, promoting trust and compliance in accordance with the *Privacy Act 1988 (Cth)* and *Australian Privacy Principles (APP)*. These regulations govern how personal information should be collected, used, stored, and disclosed.

This policy should be read in conjunction with the following Academia documents, policies and procedures;

- 📄 *Complaints and Appeals Policy and Procedure*
- 📄 *Archiving, Retention, Retrieval and Destruction Policy & Procedure*
- 📄 *Student Testimonial Policy and Procedure*
- 📄 *Academia Student Handbook*
- 📄 *Academia Enrolment Form*

SCOPE

The Academia Privacy Policy applies to Academia:

- 📄 Students and Learners – prospective, active and previous,
- 📄 Employees & Independent Contractors,
- 📄 RTO Stakeholders, and
- 📄 Associates / Community Network.

Academia (RTO #45593) is committed to ensuring that;

- 📄 Confidential and personal information provided to us by an individual and/or student is collected and treated in a manner which protects the privacy of that information on behalf of the individual;
- 📄 Students are able to access their training completion records; Statements of Attainment/s, Qualifications, Record of Results with ease;
- 📄 Any individual whose personal information we collect feel safe in knowing the purposes of why we collect necessary information, and the methods of storing the information is secure and protected;
- 📄 Our cyber-security applications and servers used to store personal information are safe, secure, and backed up regularly; and
- 📄 Information pertaining to an individual is not disclosed to a third party without the written consent of the individual.

Academia, acts in accordance with the *Information Privacy Act 2009 (Qld)*, which includes the Privacy Principles. Academia complies with provisions of the federal *Privacy Act 1988*, other associated legislation and related Privacy Principles as well as any other regulatory body requirements for the collection and treatment of private information relating to students, staff and contractors.

The data collected by Academia for the purpose of enrolments, primarily relates to student information collected and recorded as per the requirements of the Australian Skills Quality Authority (ASQA) and other regulatory bodies.

STUDENT PRIVACY NOTICE

Why does Academia 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 Academia 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 Academia 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 Queensland Government Department of Employment, Small Business and Training (Queensland State 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
-  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 Academia using the contact details listed below:

Contact: Chelsea Matulich
Role: Operations Manager
Email: operations@builtbyacademia.edu.au
Phone: 0400 616 405





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 Academia 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

You may contact us via email, telephone or office visitation with the details listed below;

Contact: Chelsea Matulich
Role: Operations Manager
Email: operations@builtbyacademia.edu.au
Phone: 0400 616 405
Office: 13/212 Curtin Ave, Eagle Farm, QLD, 4009

Should you have any questions regarding the Academia's Privacy Policy, please don't hesitate to reach out to the Operations Manager at any time!



AUSTRALIAN PRIVACY PRINCIPLES (APP)

The following sections of this policy outline how Academia ensures its operations are compliant with the *Privacy Act 1988 (Cth)* and the APP requirements.

PART 1: CONSIDERATION OF PERSONAL INFORMATION PRIVACY

Australian Privacy Principle 1: Open and transparent management of personal information

The object of this principle is to ensure that Academia manages all personal information in an open and transparent way. As a Registered Training Organisation (RTO), regulated by the Australian Skills Quality Authority (ASQA), Academia is required to collect, hold, use, and disclose a range of personal and sensitive information regarding students completing nationally recognised training.

The type of personal information Academia collects and holds includes:

- ✎ Personal details and contact information
- ✎ Employment details
- ✎ Educational background including LLND (language, literacy, numeracy and digital literacy) competencies
- ✎ USI Number
- ✎ Copies of previously completed nationally recognised qualification/s, courses and/or units of competency
- ✎ USI Transcript
- ✎ Drivers Licence
- ✎ Confirmation of residential address (*if not identical to drivers licence*)
- ✎ Citizenship (one of: Medicare card, birth certificate, VISA, passport)

The type of sensitive information Academia collects and holds includes:

- ✎ Disability information and support services to facilitate training and assessment if necessary
- ✎ Indigenous Status
- ✎ Demographic information

Academia collects the above-mentioned personal information via our *Enrolment Process* through:

- ✎ Information collected on the *Academia Enrolment Form*
- ✎ Direct email communications from the Student in response to *Academia's' Enrolment Email* attaching identification, previously completed qualifications and/or USI transcript
- ✎ Face to face collection of documents (*scanned by a Academia staff member and returned to student*)

The methods of which Academia's hold personal information ensures a safe and secure storage. Personal information is stored through the following applications:

- ✎ Digital (including scanned) copies of personal information and identification is stored in password protected systems including Academia data storage software (OneDrive) and Academia's Student Management System *Ammonite*
- ✎ All hard copy paper-based information, post completion of training, is stored in a locked Archive Room and controlled as per Academia's' *Archiving, Retention, Retrieval and Destruction*
- ✎ Completed course work will be scanned directly to active student file for digital evidence of completion

In accordance with the *Standards for Register Training Organisations (RTO's) 2025*, fee-for-service student records are only required to be held for two (2) years after the student has completed the training product/from the date of completion- however to comply with the *General Construction Induction Training (GCIT) Conditions* and therefore contract, all *GCIT* records must be retained for five (5) years before destruction. Once a hard copy student file exceeds this timeframe, and is therefore no longer required to be held, the destruction of personal information is conducted in alignment with the Academia's *Archiving, Retention, Retrieval and Destruction*.
NOTE: Academia will engage a professional document shredding service on an annual basis from July 2027 to destroy hard copy documents once no longer required to be stored.

Individuals have the right to request access to their personal information held by Academia to request correction if required. Where request is made via telephone, the individual will be vetted during the call to ensure the identity matches that of the caller. Any requests in writing will be followed up with a call from Academia's Operations Manager to verify identity and confirm the request prior to updating details.

Should an individual believe a Academia representative has conducted a breach of the *Australian Privacy Principles*, they can lodge a complaint to Academia as per our *Complaints and Appeals Policy and Procedure*.



This policy is referenced on the *Academia Enrolment Form* and can be found within the *Academia Student Handbook*; via the hyperlink in the *Academia Enrolment Email* or by contacting the RTO and requesting a copy.

Academia will not disclose and personal information to overseas recipients.

The *Academia Privacy Policy* will be made available on our website free of charge.

Any RTO Employee, Contractor, Student (past or present), or Stakeholder may request a digital copy via email upon request.

In a case where the *Academia Privacy Policy* is requested, in the unlikely event the policy is not able to be provided in the requested format, Academia will discuss the circumstances with the individual making the request. This discussion will seek to come to a solution where the policy can be provided in an alternative, appropriate format, if at all possible.

Australian Privacy Principle 2: Anonymity and Pseudonymity

Anonymity: *The condition of being anonymous*

Pseudonymity: *The use of a different name from your real name, especially on something you have written*

This APP allows individuals an option to *not* identify themselves or use pseudonym when dealing with an RTO in relation to a particular matter. This principle does not apply in relation to the following:

- ✚ Academia's legal obligation to collect identification to verify identity in our enrolment process, and therefore accurately submit data to the NCVER
- ✚ Where a circumstance is impractical to discuss, such as a complaint, where the individual chooses to be pseudonym, a dispute resolution and/or investigation process may not be able to be conducted in a timely, effective, and professional manner.

In the case of a complaint, conflict of interest, or individual safety matter, the individuals' case will be escalated to Academia's Operations Manager to be discussed with full confidentiality

Where an individual wishes to enrol into a Nationally Accredited course, qualification, or unit of competency with Academia, and practices anonymity in the enrolment process, Academia's Operations Manager will contact the applicant directly to discuss and disclose our legal obligations in the collection of personal information. In the case the applicant is using a different name for personal safety reasons, the Operations Manager will provide confidence in our processes, and where necessary, communicate the individuals request for anonymity and/or pseudonymity to relevant Staff such as the allocated Trainer & Assessor and Administration staff.

PART 2: COLLECTION OF PERSONAL INFORMATION

Australian Privacy Principle 3: Collection of Solicited Personal Information

Academia will only request to personal information relative to their enrolment and legal obligations of the RTO.

Prior to enrolment, the applicant is made aware of reasons for collection of said information in numerous ways including:

- ✚ Written and/or verbal communication regarding course enquiry and/or enrolment
- ✚ Documented in *Academia Enrolment Pack Email* by;
 - referencing our *Privacy Policy* website access, and
 - within the *Academia Student Handbook* that is attached in a PDF format
- ✚ Stated on the *Academia Enrolment Form* which is supported by the *Privacy Notice* documented in the form. The Applicant is also required to declare they understand the privacy notice in the *Student Declaration* section of the *Academia Enrolment Form*

Where personal information is required for other purposes such as employment or engagement of services, the collection of personal information specifics are disclosed when presenting the relative Academia Employment Contract, or Independent Contractor Agreement, in conjunction with a declaration authorising the consent for collection, use, and disclosure.



Australian Privacy Principle 4: Dealing with Unsolicited Personal Information

Unsolicited personal information is information received by Academia that was not requested by the RTO. Should Academia ever receive unsolicited personal information, the Operations Manager (within a reasonable period after receiving the information,) will investigate the potential reason for receiving. This process will determine whether or not the RTO could have collected the information under Australian Privacy Principle 3, which would in fact deem it to be solicited information.

Where it is identified the information was not solicited, Academia will, as soon as practicable, but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified. If applicable, the Operations Manager will respond to the communications in which it was received to acknowledge that some, or all, of the personal information provided was not required, and confirm the information has been removed from all systems and threads.

Australian Privacy Principle 5: Notification of the Collection of Personal Information

Whenever Academia collects personal information about an individual, Academia takes numerous steps to notify the individual regarding the details of the required information, and in some cases a thorough explanation as to why the personal information is necessary.

This notification occurs prior to the collection of the information generally discussed in pre-enrolment and pre-qualification interactions via verbal and/or written communication that outlines:

- 🔑 Type of information required including identification documentation
- 🔑 The purpose of collecting personal information (including and secondary purposes),
- 🔑 The consequences for the individual if some, or all, of the personal information is not collected,
- 🔑 Other organisations to which the information is usually disclosed to, including the name of those parties and reasoning for disclosure
- 🔑 That personal information is required to be collected as per the *Student Privacy Notice* outlined on page one (1) and two (2) of this *Privacy Policy*

Prior to the collection of personal information, Academia identifies what personal information is required to be documented and returned within the *Enrolment Pack* email and the *Academia Enrolment Form*. This written communication also refers individuals/prospective students to the *Academia Student Handbook* for further information as to why we use and collect certain information.

Academia will ensure the individual confirms their understanding of these details, such as through signed declarations, email communications verifying reasoning for collection, and/or in person through conversation.

NOTE: Student enrolments will not be processed unless they tick to declare the "identification documents provided to support your enrolment are true and correct " and they "consent to the collection, use and disclosure of my personal information in accordance with relevant legislation and regulations as per the Privacy Notice mentioned on this form"

PART 3: DEALING WITH PERSONAL INFORMATION

Australian Privacy Principle 6: Use or Disclosure of Personal Information

Academia will **only** use or disclose personal information it holds about an individual for the primary purposes for which the information was collected, or in the case it is required for secondary purposes such as:

- 🔑 An individual consented to secondary use or disclosure
- 🔑 Using or disclosing the information if requested by law, for example: an ASQA Audit
- 🔑 Where an individual would reasonably expect the secondary use or disclosure that is directly related to the primary purpose of collection

In the event that Academia wishes to use personal information for the purpose of a *Student Testimonial*, please refer to the *Student Testimonial Policy and Procedure*.



Australian Privacy Principle 7: Direct Marketing

Academia does not use or disclose personal information that it holds about an individual for the purpose of direct marketing unless there is written consent to receive marketing material and/or messages from Academia.

Within all direct marketing communications, Academia will provide a prominent statement that an individual may "opt out" or "unsubscribe" from receiving marketing at any time. This option allows individuals who wish to remove themselves from future marketing communications to do so with ease. Academia will promptly comply with any request relating to being excluded from direct marketing. In addition, on request, Academia will notify an individual of our source of their personal information, unless it is unreasonable or impracticable to do so.

Australian Privacy Principle 8: Cross-border Disclosure of Personal Information

Academia does not send personal information overseas.

Australian Privacy Principle 9: Adoption, Use, or Disclosure of Government Related Identifiers

Academia would not normally collect an individual's *government related identifier*, however in the case that we do, Academia would not adopt, use, or disclose a *government related identifier* associated to an individual unless:

- 🚩 Prescribed by regulations
- 🚩 In a situation where it is required by Australian law or other legal requirements
- 🚩 Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority

Possible *government related identifiers* include and individuals passport number and/or VISA information

PART 4: INTEGRITY OF PERSONAL INFORMATION

Australian Privacy Principle 10: Quality of Personal Information

Academia ensures to take all reasonable steps to confirm that the personal information collected by an individual is accurate, up-to-date and complete.

Quality measures in place to ensure this is supported include:

- 🚩 Students: Thorough enrolment vetting to verify all identification is valid, in date, and matches those details of the individual provided in their *Enrolment Form*
- 🚩 Staff and Contractors: HR file audit checklists completed prior to finalising onboarding; system reminders for any personal information that has an expiry date; and system reminders for any nationally accredited training that's required to undergo scheduled renewal.

Academia ensures to take all reasonable steps to ensure that the personal information we use or disclose is, having regard to the purpose of the use of the disclosure, is accurate, up to date, a collected is accurate, up-to-date and complete, and relevant.

Australian Privacy Principle 11: Security of Personal Information

Academia takes reasonable steps in the circumstances to protect personal information from misuse, interference and loss. Only Academia authorised Employees and Contractors will have access to digital files which is also dependent on their role and position within the company.

All Staff and Contractors who are provided access to particular server locations that contain individuals' personal information, are all required to sign a privacy waiver to confirm they have read and understood this *Privacy Policy* and acknowledge all personal information held by Academia is strictly confidential. All Employees and Contractors are also trained regarding collection, using, disclosing and destroying *personal information*, and related Academia processes during their HR Induction.

The server system utilised by Academia ensures all digital files are stored securely, safely, and have a backup protocol to ensure no personal information is lost.



Access to Academia offices and working spaces are limited to Academia personnel only (Note: office spaces remained locked outside of business hours.)

Visitors and guests may only enter certain areas of the premises if accompanied by a Academia Staff member. As a result, all personal information is available to be seen or removed from the property; all files are student personal information that may otherwise be printed for immediate use is stored securely in locked offices.

In regards to paper-based personal information for completed students held by Academia for regulatory retention obligation, the RTO maintains a strict archive procedure where only the Operations Manager has access to the archive room, that remains locked at all given times.

Academia must retain certain personal information for a period of time; where the retaining of information exceeds the holding period, the Operations Manager follows the *Archiving, Retention, Retrieval and Destruction*, as to destroy or de-identify personal information once it is no longer needed for which the personal information may be legally used or disclosed.

Academia do not store any personal banking information or credit card details – Any transaction processed through our PCI Service Providers (Stripe and Westpac EFTPOS Air) are all processed through an encrypted process integrated by the third party that ensures a Students payment data is protected. You can access the *Stripe* and *Westpac EFTPOS Air* Privacy Policies and Terms and Conditions through their websites on more information on how they protect personal information and data.

PART 5: ACCESS TO, AND CORRECTION OF, PERSONAL INFORMATION

Australian Privacy Principle 12: Access to Personal Information

Should an individual request to be provided or given access to any of their personal information that is held by Academia, we will acknowledge and action their request through an investigation.

In processing this request, Academia will always confirm the identity of the individual making the request, and within seven (7) calendar days, notify the individual whether the information can be provided, or the request is refused.

Possible exclusions, or reasons for denying access include:

- ✖ Academia believe providing access would pose a serious threat to the life, health, or safety of any individual, or to public safety;
- ✖ Giving access would have an unreasonable impact on the privacy of other individuals;
- ✖ The request for access is frivolous (shallow or in vain) or vexatious (troublesome or distressing);
- ✖ Providing access is unlawful;
- ✖ Denying access is required or authorised by or under an Australian law;
- ✖ The information relates to existing or anticipated legal proceedings between the entity and the individual, and would not be accessible by the process of discovery in those proceedings;
- ✖ Giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process

Due to legislative and/or regulatory requirements, should a previous or active student misplace or request their *Unique Student Identifier* (USI) number, Academia cannot provide this information unless the student is willing to submit the applicable application to authorise the RTO to do so. The circumstance in which this request for information is actioned requires the student submit explicit, hand signed written authorisation for Academia to supply them with their USI, outlining the reason why and confirming the consent for us to do so. When actioning, Academia will ensure compliance with privacy laws, the *Student Identifiers Act 2014* and the *Standards for RTOs 2015*, particularly regarding the handling of personal information.

Where a request is refused, Academia's' Operations Manager will communicate in writing the following points:

- ✖ The reason why certain personal information cannot be provided and why it is unreasonable to do so,
- ✖ References any regulations and/or legislation that support the refusal, and
- ✖ Provide our *Complaints and Appeals Policy and Procedure* should they wish to escalate the matter.

Where a request is able, any information provided to an individual will be free of charge, provided to the individual in a way that is confidential, and meets their needs as well as Academia's'.



Australian Privacy Principle 13: Correction of Personal Information

Should Academia hold personal information about an individual and believe that the information held is inaccurate, out of date, incomplete, irrelevant or misleading for the purposes it is required, Academia will take reasonable steps to rectify and/or obtain the correct information.

Requests for correction of personal information may be disclosed via one or more of the following communication methods:

- ✉ Written: email outlining the correction required and reasoning for the correction (often followed up by a call where the matter is urgent)
- ☎ Verbal: phone call to discuss and disclose any reasoning behind why a correction is necessary and the preferred method of receiving updated personal information
- 👤 Face to Face: where personal information is identified as inaccurate, out of date, non-compliant in a face to face setting, the Academia representative will explain the circumstance and provide details of how to update/provide the necessary information and/or documentation.

The individual may request Academia to correct the information on their behalf. Where this is the case, the Operations Manager will acknowledge the request but state for compliance purposes, will need to receive this detail in writing. To facilitate, the Operations Manager will explain a process to capture this in writing and send the individual an email reiterating the discussion points regarding correction of personal information, and should the individual permit Academia to correct on their behalf, a response is required stating they authorise Academia to correct the personal information mentioned in the correspondence on their behalf (*with the inclusion of any correct information required*). This communication is saved into the appropriate file on the server that is assigned to the individual.

Where Academia refuses to correct information requested by an individual, we will, within seven (7) days of receiving the request, provide written notice outlining:

- ✉ The reasons for refusal except for the extent that it would be unreasonable to do so, and
- ☎ The methods and mechanisms available to complain about the refusal, and
- ✉ Any other matter prescribed by regulations

Academia will not notify any third parties to correct information on behalf of an individual.

UNIQUE STUDENT IDENTIFICATION (USI) NUMBER

The USI initiative was jointly developed by Federal, State and Territory governments in consultation with stakeholders with the initiative officially commencing January 1st 2015. The initiative is supported through Commonwealth legislation known as *Student Identifiers Act 2014* and administered through the USI Registry System.

A USI number is unique to every individual, and as a result of the initiative, the USI creates a government authenticated record of individuals' vocational education and training (VET) achievements via a USI Transcript.

The USI is a mandatory data element of the *Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS)*. It is required that all Registered Training Organisations (RTO's) report on every student undertaking nationally accredited training with the inclusion of USI data submitted to the NCVET.

Academia ensures that all prospective students are made aware of the personal information required to create a USI number ahead of enrolment, should the individual not already have one, or it is required to be verified. This information is specified on the *Academia Enrolment Form* as well as in the *Academia Student Handbook*.

When creating a USI number, certain personal details are required to be entered and verified through the *Australian Government IDMatch* document verification service. As it is a requirement to utilise an individuals' personal information in the creation of a USI number, there is a declaration authorising Academia to use this information and act on the students behalf to do so. The alternative is that the Student follows the instructions for an online application themselves, resulting in their unique student identification number to be automatically sourced from within our Student Management System *Ammonite* upon onboarding.

In order to meet our obligation as an RTO under the *Student Identifiers Act 2014* and *Clause 3.6 – Participate in the Student Identifier Scheme of the Standards for Registered Training Organisations 2015*; where a Student does not have a USI number, or an individual questions the "declaration" tick box on the *Academia Enrolment Form* regarding USI numbers, Academia elaborates on the purpose of a USI number, including why it's necessary to assign their training and assessment data to their USI, and explain that under the legislation, an RTO must not issue a Statement of Attainment or a Qualification unless the student has been assigned a USI.

END OF PRIVACY POLICY

