

 GRAYCLAY RTO 45101 CRICOS XXXX	HR 1.7 Subject: Privacy Policy Agreements Date Revised: 28/06/2018
Human Resources Standards for RTO Privacy Act 1988 (Cth)	Revised by: RTO Officer Approved by Grayclay Director

1. Purpose

- a. This Policy explains how Impavid Education Pty Ltd trading as GRAYCLAY protects and manages privacy of staff, clients and customers.

2. Scope

- a. This Policy applies to all managers, officers, workers and contractors of GRAYCLAY. This Policy also applies to Learners enrolled in the Registered Training Organisation (RTO) of Impavid Education trading as GRAYCLAY, training courses or qualifications(Learners).

3. Policy Statement

- a. GRAYCLAY is committed to protecting the confidentiality and privacy of its staff, contractors and clients and, as such, is intent on complying with the Privacy Act 1988 (Cth) and the subsequent Privacy Amendment (Enhancing Privacy Protection) Act 2012. It is therefore the policy of GRAYCLAY to comply with the Australian Privacy Principles (APPS) set out in the Act.

4. Responsibility and Authority

- a. It is the responsibility of the GRAYCLAY to ensure compliance is maintained in accordance with the legislated Act/s.

5. Procedure

- a. What personal information do we collect & release, how and why do we need it?
 - i. GRAYCLAY collects and releases, in the normal course of business, information relating to its own staff, contractors, customers and training Learners.
- b. **Staff and Contractors**
 - i. GRAYCLAY collects and releases information about its staff and contractors which a business of this type would normally be expected to collect. This includes but is not limited to resumes, qualifications, medical records related to absences (as required by our SOPs), financial records and performance reports. Information is collected and released in the normal course of business.
- c. **Training Learners**
 - i. To enable us to fulfil our responsibilities as a Registered Training Organisation (RTO), GRAYCLAY will collect, use, store, and disseminate personal information, as defined by the Privacy and Personal Information Protection Act 1998, in a manner consistent with the Information Protection Principles contained within that Act and those requirements as outlined in the Data Provisions of the VET Quality Framework NVR Standards for RTOs, including all data required for

AVETMISS and other required reporting.

- ii. The information on Learners of training are collected through enrolment forms and assessment records. GRAYCLAY protects personal information about Learners from misuse or loss. Only staff who require Learner information to provide services or to process information are permitted access.
- iii. Personal information is stored in GRAYCLAY's training record management systems. These systems are password protected with defined levels of access. Learner information that is collected from someone other than the Learner, employer, the Learner will be notified and advised the circumstances for the collection.
- iv. Information is released to authorised parties in person, in writing, by telephone, by fax, by email and by reports. This information may be released to the Learner themselves, employers, and government agencies. Should information be required to be released to an additional source, who has previously not been nominated, consent is sought from the individual.

d. Who will see or have access to personal information?

- i. Learner related reports we generate from personal information, combined with information gathered, are forwarded to the authorised parties and copies are forwarded to employers and the Learner as required, unless permission to do so has been restricted or revoked. Learners may be entitled to receive a copy of the information in some circumstances.
- ii. Unless we are required to provide personal information to others by law, by court order or to investigate suspected fraud or other unlawful activity, personal information gathered will only be seen or used by persons working in or for GRAYCLAY and on a strictly 'need to know' basis. That is, unless the information is directly related to the reasonable completion of their duties, such information will not be disseminated.

6. Information Security

- a. Our information systems and files are kept secured from unauthorised access and our staff and contracted agents/ service providers have been informed of the importance we place on protecting privacy and their role in helping us to do this, and are contractually bound to honour such privacy.

b. What if a person wants to check what personal information is held about them?

- i. Subject to any legal restrictions, GRAYCLAY is willing to advise any person, internal or external to the company, on what personal information we hold about them if such a request is made. For non-employees or training Learners there may be some cost to the party in our providing this information if the request is complex or requires detailed searching of our records.
- ii. If a party believes there are errors in our records, they are encouraged to let us know so we may investigate and correct any inaccuracies.

7. Request copies of information

- a. All requests for copies of information or files must be in writing to:

*Email - Admin@grayclay.com.au The Chief Executive Officer GRAYCLAY
Level 1/1 Short Street Southport Qld 4215*

Please allow 21 working days for information to be provided.

- b. What if a person has a complaint about the handling and collection of their personal information?**
- c. A complaint about information privacy indicates GRAYCLAY's procedures, staff or quality of service associated with the collection or handling of personal information will be investigated. GRAYCLAY will be efficient and fair when investigating and responding to information privacy complaints.

8. Further information

- a. If any person would like further information on our Privacy Policy or if there any concerns over the privacy protection of the information given to us or that we have collected from others, please contact GRAYCLAY administration on phone number: 0755313738.