



**RTO CODE: 40749**

**ABN: 42 163 146 978**

# Privacy Policy

## 1. Purpose

The purpose of this policy to set out how Headway Education collects, uses, stores and dispose information of its students, staff and other personnel.

## 2. Scope

This Policy applies to all personnel of Headway Education including staff, contractors, agents or service providers who have access to personal or other information.

## 3. Definitions

**Personal Information:** Recorded information about an identifiable, or easily identifiable, individual.

**Sensitive Information:** Information about a living individual's race or ethnicity, political opinions, religious or philosophical beliefs, sexual preferences or practices, criminal record, or memberships details, such as trade union or professional, political or trade associations.

## 4. Policy

Headway Education collects information in the normal course of business. Information is collected from students, prospective students and other parties for various reasons. Information may be collected in person, via electronic means such as online forms and emails, hard copy documents or other media. This may include Personal Information that identifies individuals.

Headway Education values the privacy of every individual and is committed to handling Personal Information in accordance with the privacy principles contained in the Australian Privacy Principles (APPs) set out in the *Privacy Act 1988*.

### a) Collection of personal information

Headway Education collects Personal Information as necessary for its core functions, including for educational, research, community and commercial purposes.

Headway Education may collect Sensitive Information in certain limited circumstances. When we collect Sensitive Information, all reasonable steps are taken to explain:

- Why the sensitive information is being collected;
- What will be done with this information; and
- The consequences (if any) for an individual if all or part of the information is not provided to Headway Education.

## **b) Using personal information**

Headway Education uses and provides, personal or health information to other people or organisations, for the purposes it was collected.

Typical collections and uses of information include, but are not limited to:

- Application for Headway Education services
- Enquiries
- Enrolling students
- Conducting marketing campaigns
- Budgeting
- Maintaining information technology facilities
- Transacting with other Headway Education entities
- Student services
- Assessing students' work.

Occasionally, Headway Education may be authorised by law to use or provide Personal Information to others for alternative purposes. In some cases, an individual's consent will be sought to use or provide Personal Information to others.

Headway Education will only assign or adopt a unique identifier (e.g. student or employee numbers) for an individual if it is necessary, authorised by law or with consent. Headway Education is committed to ensuring that any transfer of Personal Health information outside of our databases and control is in accordance with law.

## **c) Ensuring that information is accurate and up-to-date**

Headway Education takes reasonable steps to ensure that Personal Information held is accurate, complete and up-to-date.

Headway Education relies on individuals to provide accurate and current information in the first instance, and to notify when circumstances or details change.

## **d) Storage and protection of information**

All areas of Headway Education have security measures to protect Personal Information from misuse, loss, unauthorised access or disclosure.

Personal Information may be stored in hard copy documents, as electronic data, or in Headway Education software or systems. Some of the ways Headway Education seeks to protect personal information include:

- Privacy process and the protection of information

- Document storage and data security processes
- Security measures for access to Headway Education computer systems
- Controlling access to Headway Education premises
- Web site protection measures

#### **e) Access to information held by Headway Education**

Individuals have the right to access or obtain a copy of the Personal Information that Headway Education holds about them. Requests to access or obtain a copy of Personal Information must be made in writing. There is no charge for an individual to access Personal Information that Headway Education holds about them. Individuals will be advised of how they may access or obtain a copy of their Personal Information within 10 days of receiving their written request. Where it is reasonable to do so, access to the Personal Information will be provided in the manner requested by the individual.

If an individual considers their Personal Information to be incorrect, incomplete, out of date or misleading, they can request that the Personal Information be amended. Where a record is found to be inaccurate, a correction will be made as soon as practical. Where a request is received from an individual to have a record amended because it is inaccurate, but the record is found to be accurate, the details of the request for amendment will be noted on the record. There is no charge for making a request to correct Personal Information.

#### **f) Website Privacy**

Headway Education may make a record of your visits to Headway Education websites and log information for statistical and system administration purposes, including but not limited to:

- Your domain name
- The date and time of the visit
- The pages accessed, and documents downloaded
- The address of your last site visited
- The type of browser used

You can choose to change your browser's cookie settings via your browser privacy settings, including blocking of the use of cookies. However, this may result in an inability to login or view some Headway Education or third-party web pages.

#### **g) Use and Disclosure of Personal Information**

Headway Education uses and discloses personal information for the purposes disclosed at the time of collection, or otherwise as set out in this policy. Personal information will not be used or disclosed for any other purposes, unless consent has been given or Headway Education is authorised or required to do so by law.

Personal information will generally only be used or disclosed as follows:

- To provide the products, services or information requested from Headway Education (including enrolment, assessment and issuing certificates of completion and testamurs).
- Personal information may also be disclosed to third parties (where applicable) to assist Headway Education with functions such as recruitment of students, work placement arrangement and others.
- To register and administer events, promotions or competitions.
- To verify personal information details upon request from third parties, such as completion of courses, a request from a potential employer verifying a qualification and further enrolment into another institution.
- To comply with Headway Education's legal and regulatory obligations, including disclosure and reporting to NCVER, Commonwealth, State and Territory government agencies for planning, evaluative, administrative purposes. This may include:
  - disclosure to government agencies responsible for administering and regulating education and training providers in Australia, such as Australian Skills Quality Authority (ASQA), Tuition Protection Service (TPS), NCVER
  - tuition assurance scheme providers, and
- To the extent that Headway Education is required to report data breaches to the Office of the Australian Information Commissioner. These breaches occur:
  - when there is unauthorised access, disclosure or loss of personal information when the breach is likely to result in serious harm (to one or more affected individuals), and
  - when preventing the risk of serious harm through remedial action is unsuccessful.

## 5. Complaints and Appeals

Breach of the policy must be reported in writing or by any other means as agreed between the complainant and Headway Education. Headway Education will assess the complaint in accordance with the applicable policies and procedures.

Where an individual is not satisfied with the decision made by Headway Education in relation to the complaint, they have the right to appeal the decision.

For more information about how your complaints and appeals are handled, please refer to the relevant *Staff Complaints and Appeals Policy and Procedure* and *Student Complaints and Appeals Policy and Procedure*.

## 6. Review

This policy and procedure will be reviewed once every two years or earlier, if required.