

1. PURPOSE

HGT Australia Ltd is bound by the Australian Privacy Principles (APP) contained within the Privacy Amendment (Enhancing Privacy Protection) Act 2012 and the Privacy Act 1988. This policy ensures transparency of the collection of personal information and how this information is handled.

2. SCOPE

This policy is applicable to all Novaskill staff and individuals acting on its behalf, students, employers, clients, and potential consumers.

3. DEFINITIONS

This policy defines the below terms as follows;

AVETMISS - The National Data standard for the collection, analysis and reporting of Vocational Education and Training (VET) information

Data Breach – Personal information that has been accessed, altered, disclosed without authorisation, or is lost.

NCVER - National Centre for Vocational Education and Research

Personal Information – Specific information that may identify an individual for example: name, Date of birth, Unique Student Identifier, phone number, email address, address

OAIC – Office of the Australian information Commissioner

Sensitive information – Specific information that may be sensitive to an individual for example: face or ethnic origin, religious beliefs, medical history, criminal records, political opinions, LGBTQAR status

Unique Student Identifier (USI) – an individual's education number issued by the Australian Government to help keep records relating to individual tertiary studies.

4. STANDARDS OF LEGISLATION

This policy refers to the following standards and legislation;

- Privacy Act 1988 (Cth) (the Privacy Act) and to the requirements of the Australian Privacy Principles (APPs) contained in Schedule 1 of the Privacy Act.
- The Privacy and Personal information Act 1998 (NSW)
- National Vocational Education and Training Regulator Act 2011
- The National VET Data Policy 2020

5. REFERENCING

This policy references the following;

- Record Retention Policy and Procedure
- Complaints and Appeals Policy and Procedure
- Privacy Notice
- ICT System Security Policy

Staff Initials _____

6. POLICY STATEMENT

Novaskill is obligated to collect a variety of personal information from students, clients and staff that is necessary for its functions and activities. Novaskill will only collect, store, and destroy personal information in accordance with the Australian Privacy Principles. Novaskill through the application of this policy will:

- Collect personal information by lawful, fair, and non-intrusive means
- Not use or disclose personal information about an individual for a purpose other than the primary purpose of collection
- Take reasonable steps to ensure that the personal information collected, used, or disclosed is accurate, complete, and up to date.
- Take reasonable steps to protect the personal information held from unauthorised disclosure, misuse, or loss.
- On a reasonable request provide an individual with access to and correction of the information that is held about that individual
- In the case of a suspected breach of the APP, maintain an effective privacy inquiry and complaints handling system.
- Collect personal or sensitive information about an individual by consent or if the collection of that information is by law.
- Only use personal information for marketing purposes if consent has been granted by the student, employer, or client.

7. DISCLOSURE OF PERSONAL INFORMATION

In accordance with legislative and regulatory requirements, Novaskill is required to provide information to State and Commonwealth Government departments for the purpose of administration, research, and quality assurance. These parties include:

- State Training Authorities
- Apprenticeship Centres
- The National Centre for Vocational Research (NCVER)
- The Unique Student Identifier Registry
- Collections Agents to redeem outstanding payments
- Where we are required to disclose necessary information due to the enforcement of the criminal law, civil court, or protection of public revenue
- To prevent or lessen a serious and imminent threat to the life or health of staff or students or any other person

8. ACCESS TO PERSONAL INFORMATION

Students may access their personal records at any time simply by emailing Novaskill head office at on enquiries@novaskill.com.au

Novaskill will stop contacting students when requested however, it is a requirement under government funded courses, Novaskill is required to maintain contact under contractual agreements to monitor student course progression.

9. MARKETING

At times, Novaskill may use photos or video of students to promote its products and services. Students who do not want their image used for marketing or promotional activities can advise Novaskill at the time of enrolment.

Staff Initials _____

10. NATIONAL CENTRE FOR VOCATIONAL EDUCATION AND RESEARCH (NCVER)

As a Registered Training Organisation (RTO) 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 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 Australia VET Sector.

Students may receive surveys from Novaskill, other government departments, NCVER or a relevant Third Party. Surveys are used to gather statistical information and to improve Vocational Education and Training services at a government level or as a continuous improvement process used by Novaskill. These surveys are voluntary, and students may choose not to participate at the time of being contacted.

You can find more information on how NCVER collects and uses student personal information here: [National Centre for Vocational Education Research](#)

If you wish to make a complaint about how your personal information is being collected, please refer to Novaskill Complaints and Appeals Policy and Procedure which is available on our website at www.Novaskill.com.au

11. Data Breaches

It is mandatory to report any breach of private information held by HGT Australia Ltd within 30 days of any alleged breach occurring. While every precaution is taken to ensure the safety of any personal data there is always still potential for criminal hackers to undermine security protocols.

If an eligible data breach is confirmed, as soon as practicable HGT Australia Ltd must provide a statement to each of the individuals whose data was breached or who are at risk, including details of the breach and recommendations of the steps individuals should take. A copy of the statement must also be provided to the Office of the Australian Information Commissioner (OAIC).

A data breach is eligible if it is likely to result in serious harm to any of the individuals to whom the information relates.

Not all data breaches are eligible. For example, if an entity acts quickly to remediate a data breach, and as a result of this action the data breach is not likely to result in serious harm, there is no requirement to notify any individuals or the Commissioner. There are also exceptions to notifying in certain circumstances

12. EMPLOYEE DECLARATION

I hereby declare that I have read and understood this document and agree to adhere to the guidelines presented. I understand that those employees who don't adhere to this document may face disciplinary action.

Name:

Signature: Date:

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