Privacy and Confidentiality

Purpose and Scope	The purpose of this Privacy and Confidentiality Policy and Procedure is to: • Clearly communicate how Armstrongs Driver Education will handle personal information • Provide staff and other individuals a better understanding of the type of personal information that Armstrongs Driver Education holds • Enhance the transparency of Armstrongs Driver Education's operations **Scope** This Policy and Procedure encompasses all of Armstrongs Driver Education's electronic and hard copy versions of personnel and student records. Armstrongs Driver Education will ensure a secure and effective information management system exists within the RTO to support the processes of communication, data storage and retrieval of information to enable the privacy and confidentiality of personnel and student records.
Responsibility	Armstrongs Driver Education's CEO and Administration and Sales Manager are responsible for the implementation of this Policy and Procedure; ensuring that all staff, students and clients are aware of its application and staff implement the requirements.
Standards and Conditions	The following table represents areas which this policy and procedure relates to in accordance with AQTF Essential Standards and Conditions, VRQA Guidelines, DTP Heavy Vehicle Business Procedures Manual, DTP Heavy Vehicle Service Agreement, DTP Motorcycle Business Procedures Manual and DTP Motorcycle Service Agreement

AQTF Essential Standards and Conditions and VRQA Guidelines	DTP
Standard 2 - 2.3 Standard 3 - 3.1,3.4	DTP Heavy Vehicle Service Agreement Part d - Clause 12 - 12.1,12.2,12.3,12.4,12.5,12.6,12.7 clause 13 - 13.1 - 13.5 Clause 31 - 31.1,31.2 DTP Motorcycle Service Agreement Part D - Clause 12 - 12.1 - 12.7 Clause 13 - 13.1 - 13.5

	Clause 30 - 30.1 DTP Information Security Requirements

Definitions or Reference Documents	**Definitions**
	• **VET Quality Framework** – Outlines the standards for achieving consistency in how Registered Training Organisations (RTOs) are monitored. The VET Quality Framework comprises:
	  ○ The Australian Qualifications Framework (AQF)
	  ○ The Fit and Proper Person Requirements
	  ○ The Financial Viability Risk Assessment Requirements
	  ○ The Data Provision Requirements
	• **Australian Qualifications Framework (AQF) –** The AQF is the national policy for regulated qualifications in Australian education and training. It incorporates the qualifications from each education and training sector into a single comprehensive national qualifications framework
	• **National VET Regulator (NVR) –** The Standards: Sets out the requirements that an organisation must meet to be a Registered Training Organisation
	• **VET** - Vocational Education and Training
	• **Compliance to Legislation** – There is evidence of systems and processes in place to identify relevant legislation, regulations, and guidelines as well as monitoring systems to ensure compliance
	• **Relevant legislation** – Acts of Parliament
	• **Regulatory Requirements** – Validation, Moderation, Reporting
	• **Statutory Requirements** – Approvals, licenses, permits, etc. required for the delivery of nationally recognised training
	• **Non-compliance** – Failure to provide evidence of systems and processes in place to meet the expected outcomes
	• **VRQA** - The Victorian Registration and Qualifications Authority (VRQA) is Victoria's education and training regulator
	• **VRQA Guidelines –** The Guidelines' purpose is to ensure the quality of training and assessment services in Victoria reflects a nationally consistent approach to VET regulation. The Guidelines align Victoria's regulatory settings to the national Standards for Registered Training Organisations 2015.
	• **AQTF Essential Standards and Conditions –** A national set of standards which assures nationally consistent, high-quality training and assessment services for the clients of Australia's vocational education and training (VET) system
	• **Quality Indicators –** A set of three indicators that are part of the AQTF Essential Conditions and Standards for Continuing Registration. The quality indicators are:
	  o Employer Satisfaction
	  o Learner engagement
	  o Competency Completion Rate
	• **Student** – A person being trained and or assessed by Armstrongs Driver Education Pty Ltd

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Policy Statement	This Policy focuses on Armstrongs Driver Education's commitment to protecting the privacy of its personnel and students; outlining the various ways in which it ensures this protection.
Procedure	**1. Collection of personal information – Students** ○ Armstrongs Driver Education is required to collect personal information from Students in order to process enrolments and obtain the information required to provide suitable training and assessment services. Where applicable, information may also be required to comply with AVETMISS standards as specified by government regulators. ○ Armstrongs Driver Education is required to collect personal information from Students in order to create a USI which will be linked to the national VET collection as per Armstrongs Driver Education's ***USI Policy***. This personal information, once collected will be discarded by the RTO when no longer required as per Armstrongs Driver Education's ***Records Management Policy.*** ○ Armstrongs Driver Education is required to collect and retain personal information. This personal information once collected will be discarded by the RTO when no longer required as per Armstrongs Driver Education's ***Record Management Policy.*** ○ Information collected includes general personal details and may include details of any disability or health issue that may affect the Student's ability to undertake training and/or assessment activities. ○ Armstrongs Driver Education will only collect personal information that is required for the purposes of employment or education, or in meeting both Federal and State government reporting requirements and DTP requirements - ***Refer to Armstrongs Driver Education's DTP Privacy and Confidentiality Policy and Procedure.*** ○ Armstrongs Driver Education collects all personal information in writing from a personal details form, or an enrolment form and/or other forms required by Armstrongs Driver Education which require the Student to provide personal details. ○ Students must advise Armstrongs Driver Education of any changes to personal details by telephone or email. The Student Management System will be updated to reflect changes to personal details. Changing of students details are kept confidential and filed in the Student's file. **2. Collection of personal information by others** ○ Personal information may be collected from some other person in the following circumstances: • From individuals, agents and representatives (e.g., employment consultants • Through Armstrongs Driver Education's website • Through publicly available information services (e.g., social media, local councils, telephone listings, Linkedin) • Through the participation in competitions

- When Armstrongs Driver Education conducts training and/or assessment on behalf of another organisation

3. Use and disclosure of personal information – Students

- Armstrongs Driver Education uses personal information of its students for the purposes of meeting VET requirements for the awarding of national qualifications, and to comply with reporting requirements where relevant as specified by government regulators.
- Personal information as collected through the enrolment form or through other means will be passed onto government regulators as per legal data collection requirements. This personal information may also be accessed for the purposes of an audit by VRQA.
- Personal information will not be used in any other way than those outlined in this policy, and any other ways that might be reasonably expected.
- Students are required to sign a declaration on their enrolment form agreeing/providing permission to Armstrongs Driver Education to provide their personal information to government regulators for reporting purposes.

4. Consequences if personal information is not provided

- Should an individual object to Armstrongs Driver Education collecting their personal information, Armstrongs Driver Education may not be able to provide effective services, or at all, to that individual. Further information regarding the consequences of the non-disclosure of personal information may be obtained from the Administration and Sales Manager.

5. Access to personal information

- Students are allowed access to their personal files at any time upon written request as per Armstrongs Driver Education's ***Records Management Policy.***
- Students may access their files by sending an email to our office, the email address can be found on the Armstrongs Driver Education website.

6. Storage and security of personal information

- Armstrongs Driver Education will take all reasonable steps to maintain the privacy and security of personal information.
- Information stored electronically is kept on a secure server and access is restricted to authorised employees. The server is regularly backed up and kept in a secure location.
- Paper based documents containing personal information are in a locked filing cabinet and held within a secure area within the RTO premises. – Refer to Armstrongs Driver Education's ***Records Management Policy and Procedure.***
- Where documents are required to be transferred to another location, personal information is transported securely in an envelope, folder or document bag.
- Student files are not permitted to be taken off site by staff and/or trainers/workplace assessors.

- Student files must be returned to their secure location at the end of each day.
- Reasonable steps will be taken to destroy or permanently de-identify personal information when it is no longer required for any purpose by placing it in secure bins for shredding.
- Files are archived based on the item and their period of retention.

7. Confidential Information

- Armstrongs Driver Education will make all reasonable efforts to protect confidential information received from students or partner organisations during the course of business operations. This information will not be disclosed without the prior consent of the client or partner organisation.

8. Notification of Privacy arrangements

- Students will be provided with Armstrongs Driver Education's Privacy Notice at commencement of training, this information is included in the Student Enrolment form.
- Students and Clients will be advised of:
  - Armstrongs Driver Education's Privacy and Confidentiality Policy via the website www.armstrongsdrivereducation.com.au
  - Consent to collect and create USI information via the Student Enrolment form and the USI Policy on the website
- Students will be required to read, acknowledge and understand the Privacy statements outlined on the enrolment form by signing the declaration on the enrolment form (where applicable).
- Students will be required (where applicable) to read, acknowledge, understand and consent to the RTO gathering personal information which will be used for the purposes of:
  - creating a USI
  - fulfilling AVETMISS reporting Requirements

9. Complaints

- Students who wish to make a complaint about a privacy matter are to refer to Armstrongs Driver Education's ***Complaints and Appeals Policy*** and document their complaint via email to the Administration and Sales Manager. The complaint will be investigated as per Armstrongs Driver Education's ***Complaints and Appeals Policy***.

10. Data Breaches of Personal Information

- Personal information accessed through a data breach is to be managed as per the ***Data Control Breach Policy and Procedure.***