



## PRIVACY POLICY

### RELEVANT STANDARD(S):

<a href="#">Standards for Registered Training Organisations (RTOs) 2015</a>	<i>Clause 3.1</i> <i>Clause 7.5</i> <i>Clause 8.2, 8.5</i>
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### PURPOSE

Energy Training Group is committed to maintain the privacy of personal information provided by staff and clients in accordance with the requirements of the 'Standards for Registered Training Organisations (RTOs) 2015' and Australian Privacy Principles of the Privacy Act 1988.

### POLICY PRINCIPLES

Energy Training Group is committed to the Australian Privacy Legislation and this policy describes how:

1. Energy Training Group will comply with the Commonwealth Privacy Act 1988,
2. The Privacy Amendment (Enhancing Privacy Protection) Act 2012,
3. and Australian Privacy Principles (APP) in the way it collects, uses, secures and discloses personal information.

### Data Collection on Website:

1. Energy Training Group lawfully collects personal information that is necessary both for appropriate marketing and promotional information sent to potential clients, and the marketing and promotion of products and services of third parties elected by Energy Training Group for the purpose disclosed at the time of collection and other purposes set out in this Privacy Policy.
2. By providing the limited personal information on Energy Training Group website, any other website promoting our products and services, or through other means, clients and potential customers agree to allow Energy Training Group and other third parties elected by Energy Training Group to send out marketing materials including, but not limited to their promotions and special offers, product information, information about services, newsletters, and other forms of communication from time to time.
3. We will disclose basic information that we gather about our staff or students only to third parties that we elect as having potentially relevant or useful products and services to them. We use the information collected only for the services we provide and our third parties we elect. Email addresses, phone numbers, product enquiry information, and first and last names may be shared with a third party elected by Energy Training Group however no other staff or student information is shared with another organisation unless required by Commonwealth and State Government authorities and agencies.



4. If staff or student information is required or requested by any third party outside of those which Energy Training Group elects, we will obtain written consent from the relevant staff or student prior to release of any information. Should staff or students seek access to their information, they will be asked to supply their name, date of birth and address as identification before this can occur.

***Data Collection to Provide Training and Assessment Services:***

1. In order to provide training and assessment services, Energy Training Group lawfully collects personal information from staff and clients that are necessary both for appropriate marketing and promotional information to be sent to potential clients; and for the business to function.
2. The information collected and held will depend upon the products and services requested. This information is required to be reported to ASQA under the requirements of the Australian Vocational Education and Training Management Information Statistical Standards (AVETMISS). AVETMISS provides a free data entry tool for smaller RTOs to use here: <https://det.ncver.edu.au/det/>.
3. Information collected may include, but is not limited to:
  - a. Full name
  - b. Address
  - c. Contact details (telephone and email)
  - d. Date of Birth
  - e. Gender
  - f. Cultural Background (Indigenous)
  - g. Country of birth
  - h. Language spoken at home
  - i. Level of English spoken
  - j. Disability information
  - k. Highest schooling completed
  - l. Other qualifications completed
  - m. Current employment status



4. Energy Training Group will only collect personal information by fair and lawful means.
5. The enrolment form completed by clients contains a disclaimer outlining why the personal information is collected and how it is to be used. Clients are required to sign the disclaimer as their agreement to the use of their personal information.

### ***Un-solicited Information***

1. Unsolicited information received by Energy Training Group is afforded the same privacy protection as solicited personal information.
2. If unsolicited information is received by Energy Training Group, Energy Training Group takes initiative to determine whether it could have collected the information through its various data collection channels. If received information is identified as deliberately obtained by Energy Training Group, Energy Training Group will, in the handling of the information, comply to the principles of this document and the relevant legislations on data privacy.

Information identified as not solicited by Energy Training Group will be destroyed or de-identified as soon as practicable, provided such actions are lawful and reasonable, and the information is not contained in a Commonwealth record.

### ***Use and Disclosure***

1. By providing personal information to Energy Training Group on the website, any other website promoting our products and services, or through other means, clients and potential customers agree to allow Energy Training Group and other third parties elected by Energy Training Group to send out marketing materials including, but not limited to their promotions and special offers, product information, information about services, newsletters, and other forms communication from time to time.
2. Individuals are notified every time Energy Training Group obtains information. Notification may be done prior to the respective channel/s, such as the website or fill-out forms, where the individual discloses relevant information prior to or immediately after data collection. The individual may opt to refuse request for personal information through the channel where information is being obtained.
3. Energy Training Group will inform the individual whether information provided may be used for domestic or international audiences. Where Energy Training Group identifies that information may be used for cross-border or international purposes:
  - a. Energy Training Group assumes responsibility of its elected international or cross-border recipients. They are bound by the same legislations, and principles as stipulated in this document. As such, any breach of the Australian Privacy Policy by international recipients is taken to be a breach of the Australian Privacy Policy by Energy Training Group.



- b. Prior to disclosing personal information to an overseas recipient, Energy Training Group will follow reasonable steps to ensure that the recipient does not breach the Australian Privacy Principles and the stipulations of this policy.
      - c. The Energy Training Group may choose not to apply the provisions of the cross-border disclosure following consent from the individual.
      - d. Regardless of Energy Training Group or the individual's (i.e. student / potential students) discretion, cross-border disclosure is imposed if required by Australian law, or a court/tribunal order.
4. Energy Training Group uses the information collected for either marketing and promoting our products and services, or marketing and promotion of the products and services of third parties elected by Energy Training Group for the purpose disclosed at the time of collection and other purposes as set out in this Privacy Policy. Energy Training Group will not use personal information for any other purpose without first seeking consent, unless authorised or required by law. Generally, Energy Training Group will only use and disclose personal information:
  - a. To establish and maintain the relationship to Energy Training Group
  - b. To promote and market its products and services
  - c. To provide the products and services requested from Energy Training Group and other learning providers in which you enrol or apply to enrol
  - d. To promote and market the products and services of third parties elected by Energy Training Group that may have products and services of interest to clients and potential customers
  - e. To administer and manage those products and services
  - f. To comply with Commonwealth and State Government laws and regulations including the Education (General Provisions) Act 2006 and the Education (Queensland Studies Authority) Act and Regulation 2002 where applicable.
  - g. To report to National Registering Bodies in relation to training services provided.
  - h. Energy Training Group will only use or disclose personal information for direct marketing purposes where the individual has either consented to their personal information being used for direct marketing or has a reasonable expectation that their personal information will be used for this purpose, and conditions relating to opt-out mechanisms are met.
5. Access to student personal information beyond that shared with third parties for promotional purpose (email addresses, phone numbers products, product enquiry information and first and last names) is



available on application through the Administration Team of Energy Training Group. Access to personal information will be controlled at all times. A person requesting any information will be accompanied for the entire time they are in possession of their personal information by the Administration Team of Energy Training Group.

6. Student have the option to request no further contact from Energy Training Group or one of Energy Training Group elected third parties by clicking the “UNSUBSCRIBE” link provided on emails received.
7. Where the potential student / student prefers anonymity, we permit an individual to interact with Energy Training Group without identifying themselves or by using a pseudonym. Exceptions apply, however, in situations where anonymous interaction may be deemed as impracticable. In such cases, Energy Training Group will inform the individual that, for purposes of clarity, accuracy and the like, communication may be resumed in more exclusive channels, such as emails, SMS, telephone, or whichever the individual finds suitable.

### ***Agents, Contractors and Other Third Parties***

Our agents, contractors and other third parties, who require personal information to provide a legitimate service, are also bound by these terms of privacy to ensure that client and participate personal information remains protected at all times

### ***Use of Internet***

The internet may be used to transmit client and participant personal information from delivery sites to other sites and to state/federal registering bodies. Security of data transmitted to state and federal registering bodies is managed by the respective bodies and we have taken all reasonable steps to protect and secure personal information when using the internet.

### ***Data Quality***

We will ensure that personal information is accurate, complete and up-to-date. Clients and participants are encouraged to help us keep their personal information accurate, complete and up-to-date by contacting and informing us of any changes.

### ***Access to Records***

1. Energy Training Group will not disclose information that we gather about our student to any third party (apart from those exceptions previously stated.)
2. If student information is requested by third party, we will require authority from the relevant student prior to release of any information. Students will be asked to supply their name, date of birth and address as identification before this authority can be given. This authority will be kept on the Student Profile for as long as the student endorses it.
3. Should staff or students seek access to their information, they will be asked to supply their name, date of birth and address as identification before this can occur. Access to student personal information is



available on application through the Administration Team of Energy Training Group. Access to personal information will be controlled at all times.

### ***Correction of Records***

Energy Training Group follows reasonable steps to correct information, without additional charge and within 10 business days of request, to ensure that information held serves its purpose, that it is accurate, up-to-date, complete, relevant and not misleading. Energy Training Group may initiate amendment of personal information held if:

1. Energy Training Group is satisfied that the information held is inaccurate, out-of-date, incomplete, irrelevant or misleading
2. The individual to whom the personal information relates to requests the organisation to correct the information.

If Energy Training Group corrects personal information about an individual that it has previously disclosed to another APP entity, Energy Training Group will take reasonable steps to notify the other APP entity of the correction, where that notification is requested by the individual will likewise notify other entities

Where Energy Training Group refuses to correct personal information of an individual, Energy Training Group will send a written notice to the individual requesting the amendment, indicating the reason for refusal, the mechanism available to complain about the refusal and any other matter prescribed by regulation.

Energy Training Group will likewise indicate in its records that the information held is inaccurate, out-of-date, incomplete, incomplete, irrelevant or misleading in a way that is apparent to the users of the information.

### ***Privacy Concerns***

Clients are able to raise any concern they may have regarding personal information handling practices by contacting our administration staff.

## **MONITORING AND IMPROVEMENT**

Energy Training Group is responsible for all continuous improvement processes in relation to the privacy policy and procedure and ensuring that all staff, including those from third party providers are complying with the provisions of this policy.



**VERSION CONTROL**

<b>Version Control Table</b>					
<b>Date</b>	<b>Summary of Modifications</b>	<b>Modified by</b>	<b>Version</b>	<b>Date of Implementation</b>	<b>Next Review Date</b>
27/05/2020	Policy Creation	360RTO Solutions	v.1.0	29/04/2021	29/04/2022