

# POLICIES AND PROCEDURES MANUAL

## 6.1 Privacy Policy

*‘Our beginnings set our values’*



**Vital First Aid<sup>®</sup>**  
**TRAINING SERVICES**

ABN 29 079 610 325 Registered Training Organisation 90531

# Privacy Policy

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## Website

By using our website, you agree to comply with these terms and conditions and any changes that we make to them from time to time. If you do not agree with our terms and conditions, then please do not use the site. Vital first aid training services Pty ltd has procedures, business practices and systems in place that are aligned to the Australian privacy principles from schedule 1 of the privacy amendment (enhancing privacy protection) act 2012, which amends the privacy act 1988. As part of vital first aid training services Pty ltd 's privacy policy we ensure that the collection, use and disclosure of personal information relating to individuals who have contact with the vital first aid training services Pty ltd in relation to business activities and services are carried out by lawful and fair means.

In this policy, "us", "we", or "our" means vital first aid training services Pty ltd, operators of this website.

## Information we collect

The personal information we collect falls into four categories: contact details, click trails, activity history, and publishable content.

Contact details are collected as supplied by you from time to time. Details stored include, but not limited to, name, address, email address, phone number, date of birth, AVETMISS details as describes below. This data is stored electronically and protected by secure password system. Access is only available to staff duly authorised by vital first aid training services Pty ltd following signing and acknowledgement of a non-disclosure document. We do not personally store usable credit card information. Where a record is required, we entrust credit cards to our payment gateway and store only the last few digits and expiry date of your credit card solely for purposes of identity confirmation and forewarning of expiry.

Click trails record the paths taken by visitors through the website. This information is generally recorded against IP address, and may be possible to correlate by computer.

Activity history consists of orders, enquiries, votes submitted via the website, or offline contact you have with us such as phone calls.

Publishable content consists of comments or other submissions of content you would like us to publish on our website.

## How we collect it

Contact details and publishable content are collected when supplied by you either via the website or direct to us by other means.

Click trails are recorded by our servers as each request reaches the website. This includes but is not limited to:

- The type of browser you are using
- The date and time of your visit
- Your ip address
- The address of the website that referred you to ours
- The addresses of pages accessed and any documents downloaded

Click trails can be correlated over time by the use of 'cookies' as outlined. In most cases click trail data is not directly individually identifiable.

Activity history is recorded whenever you undertake an activity such as submit an enquiry, make a comment, vote on an object, and may additionally be recorded by us when you contact us offline.

## Why we collect it and how we use it

Publishable content is collected and republished where applicable in order to enable a two-way conversation in public between us and our visitors.

We collect your personal contact details and activity history:

- To respond to requests or queries you raise
- To confirm your identity
- To fulfil orders made by you
- To keep you up to date with news, special offers, and other marketing information you have opted-in to receive.

We collect click trail data:

- To measure and monitor the performance of our website
- To estimate interest in our products and services
- To refine and update our website's content
- To monitor our website for violations of the terms of use or any applicable laws by visitors

## How we disclose it

We may disclose your personal information to third parties, and you consent to us disclosing your personal information to third parties, under the following circumstances:

- As part of a sale of all or part of our business
- When explicitly authorised to do so by yourself at the time you supply the information
- As required or authorised by any applicable law
- As required for processing of credit card payments by internet payment gateways and merchant facilities.
- As part of any investigation by us into you or your activity on our website (including to your internet service provider or network administrator)

If we have reason to believe that you have committed a breach of any of our terms of use or have been otherwise engaged in any unlawful activity and we reasonably believe that disclosure is necessary (including to the police or any other enforcement body, or to your internet service provider or network administrator)

- To lessen or prevent a serious threat to a person's health or safety
- As part of the disclosure relating to unique student identification and AVETMISS data submission.

We may comment of certification you have received to a 3rd party. This includes making a statement to a 3rd party about the validity of a certification. No personal information will be provided to this 3rd party and verification will only be provided if the 3rd party has a copy of the certification.

## Publishable content

When you submit content to us for publication (including but not limited to comments, testimonials, votes, or forum posts) you assign us a transferrable, perpetual right to publish and/or commercially exploit said content without limitation. You also warrant in submitting such content that the content is owned or produced by yourself or you otherwise have permission to assign publication rights to us. Publication rights do not extend to fields specifically marked as private (e.g. Your email address), except in cases of clear violations of our terms of use.

Content submitted by you for publication may be disclosed to all visitors of our website, and/or republished on other websites at our discretion.

If you provide personal information either of your own or of any third party as part of publishable content, you warrant that you have permission to publish said information and indemnify us against any consequences resulting from the publication of said information.

If you find your personal information published on our website without your consent, please contact us immediately.

## Cookies

Cookies are electronic tokens containing small amounts of information that are passed between a web browser and server. They are used to maintain session state between pages or to retain information between visits if you return to the website at a later time.

We use cookies to correlate passive activity tracking data as well as to authenticate supply of information such as enquiries, comments, and votes to minimise malicious or spam traffic.

## Opting in and out

You may opt out from the correlation of passive activity data by turning off cookies in your browser. Please note however that disabling cookies may result in a reduction of available functionality on our site including but not limited to the loss of the ability to post comments and vote on content.

When you supply us with your email address you may be asked to opt in to receive marketing information by e-mail or other means.

You will be given the opportunity to opt out from receiving further communications from us in accordance with this policy each time we send you information for which you have opted in. This comes in the form of an 'unsubscribe' link, generally in the footer and/or header of each email.

If you receive any communication purporting to be connected with us or our products or services that you believe has been sent to you other than in accordance with this policy, or in breach of any law, please contact us immediately.

## Information management and security

With the exclusion of information supplied for publication, we will take all reasonable steps to ensure that the personal information we hold is not lost, misused, or inadvertently provided to unauthorised third parties, including by means of firewalls, password locking, truncation of credit card data, encryption of data in transit, and secured servers.

You acknowledge that the security of communications sent by electronic means cannot be guaranteed. You provide information to us via the internet at your own risk. We cannot accept responsibility for misuse or loss of, or unauthorised access to, your personal information where the security of information is not wholly within our control.

You must ensure the security and confidentiality of any username and/or password used by yourself to access this website. You agree that you will be held responsible for all activities which occur under your username and password (including but not limited to publication of illegal or defamatory material or any other unlawful activity, or unauthorised charging of your credit card).

You agree that we are not responsible for the privacy or security practices of any third party and that the collection and use of your information by third parties may be subject to separate privacy and security policies. If you suspect any misuse or loss of, or unauthorised access to, your personal information, please contact us immediately.

## Photography Privacy

We recognise that in some circumstances there are sensitivities relating to the taking of photographs. This is particularly relevant to capturing images of children. We may, from time to time, wish to take photos of the training activities we are conducting. When these instances arise in an environment external to our own training facilities, we will first obtain permission from the premise's owner or manager, as well as from the students themselves.

If you have concerns about how Vital First Aid Training Services Pty Ltd is managing your personal information, we encourage you to inform our staff and discuss your concerns. You are also encouraged to make a complaint directly to us using our internal complaint handling arrangements outlined in this handbook.

Under the Privacy Act 1988 (Privacy Act) you also have the right to make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information. You can find more information about making a privacy complaint at the website of the OAIC located at: <http://www.oaic.gov.au/privacy/privacy-complaints>.

## Privacy notice – as directed by the Australian government department of education and training

In our operation as a Registered Training Organisation (RTO) we are required to collect certain information by external agencies such as the National VET Regulator and other licensing bodies in order to meet our compliance requirements as an RTO. All information shared is kept in the strictest confidence by both parties and is available on request. The Privacy Notice at Schedule 1 of the National VET Data Policy explains these requirements, which can be accessed through: <https://www.education.gov.au/privacy-notice>.

The Privacy Notice as at Schedule 1 of the VET Data Policy is provided in this document. It is current as of January 2021.

The relevant Privacy Principles are summarised as:

- Collection - We will collect only the information necessary for our primary function and you will be told the purposes for which the information is collected.
- Use and disclosure Personal information - will not be used or disclosed for a secondary purpose.
- Data quality - We will take all reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date.

## Security

We will take all reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure.

Vital First Aid Training Services Pty Ltd will only use or disclose personal information about a student for a purpose other than the primary purpose of collection (a 'secondary purpose') if:

1. the secondary purpose is related to the primary purpose of collection and the student would reasonably expect to use or disclose the information for the secondary purpose, or

2. Vital First Aid Training Services Pty Ltd reasonably believes that the use or disclosure is necessary to lessen or prevent a serious and imminent threat to an individual's life, health or safety or a serious threat to public health or public safety, or

3. Vital First Aid Training Services Pty Ltd has reason to suspect that unlawful activity has been, is being or may be engaged in, and uses or discloses the personal information as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities, or

4. the use or disclosure is required or specifically authorised by law.

Notwithstanding the above, Vital First Aid Training Services Pty Ltd is prohibited by law from releasing a student's personal information to third parties, including members of their family without that individual's prior written consent.

## Student Data

Under the Standards for RTOs 2015, we are required to capture student data at the time of enrolment. It is the student's responsibility to ensure they provide accurate information in regard to themselves and their enrolment. It is the student's responsibility to ensure they inform us of any change of personal details in writing within seven days of the change occurring.

This data is known as AVETMISS data – Australian Vocational Education and Training Management Information Statistical Standard. We must gather information in regard to the following data: who the student is, where they study and what they study.

We are also required to confirm the identity of the student enrolling into the course. This may involve requesting copy of photo ID or other documents that will verify the student ID.

Please Note: Enrolment into a course will not be confirmed unless the required student data and proof of ID has been collected and confirmed.

## Student Data that is stored in our SMS

Information that is stored for an extended period of time in our Student Management System includes:

- First Name Surname
- Date of birth
- USI number
- Address details *if provided to us*
- Mobile number
- Email address
- Historical academic records obtained by completing courses with Vital First Aid
- IP addresses of computers used to access our SMS

## Records Management

All course paperwork is scanned and entered into our Student Management System database. Files are stored for the legislated period of time and electronic files are backed up regularly and are stored on a protected server.

aXcelerate website details their data security <https://www.axcelerate.com.au/security-and-trust>

Information concerning contact details, financial status, academic status, attendance status, registration details, identification details, evaluations, feedback, and surveys are all confidential.

Accessing your Records

Students have access to personal records upon written request to the Compliance Team email [info@vitalfirstaid.com.au](mailto:info@vitalfirstaid.com.au) A Request for access to Student Records Form is available for this purpose, or to allow access to records by a third party.

In all cases Vital First Aid Training Services Pty Ltd will require proof of identity to protect the privacy of all client information. Student assessment records are only retained by Vital First Aid Training Services Pty Ltd for the legislated minimum timeframe of 6 months as per the ASQA General Direction on Retention requirements for completed student assessments.

Students are obligated to keep Vital First Aid Training Services Pty Ltd informed of their current contact details and to inform us immediately of any change in these details. Students should be advised that if they do not receive any correspondence due to incorrect contact details, they are fully responsible.

National Centre for Vocational Education Research Ltd (NCVER) Privacy Notice

Privacy Notice as at Schedule 1 of the VET Data Policy is provided below.

## Why we collect your personal information?

As a registered training organisation (RTO), we collect your personal information so we can process and manage your enrolment in a vocational education and training (VET) course with us.

## How we use your personal information

We use your personal information to enable us to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO.

## How we disclose your personal information

We are required by law (under the National Vocational Education and Training Regulator Act 2011 (NVETR Act)) to disclose the personal information we collect about you to the National VET 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 Australian VET sector. We are also authorised by law (under the NVETR Act) to disclose your personal information to the relevant state or territory training authority.

## How the NCVER and other bodies handle your personal information

[For up-to-date information about the NCVER Privacy Policy, please visit NCVER website Privacy Policy](#)

## Surveys

You may receive a student survey which may be run by a government department or an NCVER employee, agent, third-party contractor or another authorised agency. Please note you may opt out of the survey at the time of being contacted.

## Contact information

At any time, you may contact Vital First Aid Training Services Pty Ltd to:

- request access to your personal information
- correct your personal information
- make a complaint about how your personal information has been handled
- ask a question about this Privacy Notice

Under the Data Provision Requirements 2012 and National VET Data Policy (which includes the National VET Provider Collection Data Requirements Policy), Registered Training Organisations are required to collect and submit data compliant with AVETMISS for the National VET Provider Collection for all Nationally Recognised Training. This data is held by the National Centre for Vocational Education Research Ltd (NCVER), and may be used and disclosed for the following purposes:

- populate authenticated VET transcripts
- facilitate statistics and research relating to education, including surveys and data linkage
- pre-populate RTO student enrolment forms
- understand how the VET market operates, for policy, workforce planning and consumer information and administer VET, including program administration, regulation, monitoring and evaluation.

You may receive a student survey which may be administered by a government department or NCVER employee, agent or third party contractor or other authorised agencies. Please note you may opt out of the survey at the time of being contacted.

NCVER will collect, hold, use and disclose your personal information in accordance with the Privacy Act 1988 (Cth), the National VET Data Policy and all NCVER policies and protocols (including those published on NCVER's website at [www.ncver.edu.au](http://www.ncver.edu.au)).

## Privacy as it relates to the unique student identifier USI

If you do not already have a Unique Student Identifier (USI) and you want Vital First Aid Training Services Pty Ltd ( now known as VFATS ) to apply for a USI to the Student Identifiers Registrar (Registrar) on your behalf, VFATS will provide to the Registrar the following items of personal information about you:

your name, including first or given name(s), and surname or family name as they appear in an identification document;

\* your date of birth, as it appears, if shown, in the chosen document of identity;

\* your city or town of birth;

\* your country of birth;

\* your gender; and

\* your contact details.

When we apply for a USI on your behalf the Registrar will verify your identity. The Registrar will do so through the Document Verification Service (DVS) managed by the Attorney-General's Department which is built into the USI online application process if you have documents such as a Medicare card, birth certificate, driver licence, Australian passport, citizenship document, certificate of registration by descent, ImmiCard or Australian entry visa.

If you do not have a document suitable for the DVS and we are authorised to do so by the Registrar we may be able to verify your identity by other means. If you do not have any of the identity documents mentioned above, and we are not authorised by the Registrar to verify your identity by other means, we cannot apply for a USI on your behalf and you should contact the Student Identifiers Registrar.

In accordance with section 11 of the Student Identifiers Act 2014 Cth (SI Act), we will securely destroy (destruction will take place approx 6 months from the date of your course) personal information which we collect from you solely for the purpose of applying for a USI on your behalf as soon as practicable after the USI application has been made or the information is no longer needed for that purpose, unless we are required by or under any law to retain it.

The personal information about you that we provide to the Registrar, including your identity information, is protected by the Privacy Act 1988 Cth (Privacy Act). The collection, use and disclosure of your USI are protected by the SI Act.

If you ask VFATS to make an application for a student identifier on your behalf, VFATS will have to declare that VFATS has complied with certain terms and conditions to be able to access the online student identifier portal and submit this application, including a declaration that VFATS has given you the this privacy notice.

[USI.gov.au Privacy Policy](#)

## How to contact us

If you have any questions or complaints about how we collect, use, disclose, manage or store your personal information, or would like to request access or changes to the information we hold, please contact us via email [info@vitalfirstaid.com.au](mailto:info@vitalfirstaid.com.au)

### ISSUE HISTORY

Version Date	REVISION DETAILS
29.07.2019	Initial release
30.03.2023	Update wording including clarification of what data is stored in our SMS
21.05.2024	Update links to NCVER, aXcelerate and USI.gov.au privacy / security policies