

Purpose

The purpose of this policy is to ensure the privacy of personal information for all students and staff of Western Business School is respected, protected and maintained in a compliant manner. Our obligations under the Privacy Act 1988 (Commonwealth), Health Records Act (Victoria) and other applicable privacy laws are taken seriously and this policy outlines out how we handle personal information about individuals.

Scope

This policy applies to all current and prospective students, employers and staff of WPC Group, trading as Western Business School.

The policy and procedure has been designed to support the Standards for NVR Registered Training Organisations 2015 including, but not limited to:

- Standard 2 – Quality Assurance
- Standard 5 – Inform and protect
- Standard 8.4 – Comply with legislation (Federal and State)

Government funded contracts:

- New South Wales - Smart and Skilled Contract
- Victoria – VET Funding Contract

Responsibility

- The General Manager is responsible for implementation of this policy and procedure.
- The Compliance and Administration Manager is responsible for maintaining this policy and procedure.
- Administration staff are responsible for complying with this policy.
- All other staff and contractors are responsible for complying with this policy.

Policy

1. WBS is committed to protecting staff, student and client privacy and confidentiality in line with State and Federal Privacy legislation, including the Privacy Principles.
2. Except as required under the Standards for NVR Registered Training Organisations 2015, Government Contracts or by law, information about a participant will not be disclosed to a third party without the consent of the participant.
3. We acknowledge we are bound by the Information Privacy Principles and any applicable Code of Practice with respect to any act done or practice engaged in under the VET Funding Contract and

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- Smart and Skills Funding Contract. As such Western Business School will ensure that privacy statements to be included by other Departments will be included as required.
4. Personal information includes any information that identifies an individual or allows their identity to be readily identified from such information. If a student chooses not to provide WBS with the personal information requested, the services to be provided may not be accessible to the student.
 5. WBS will inform the student if information is withheld and will make every attempt to gather the information required through continued engagement with the student.
 6. Personal information referred to includes but is not limited to:
 - Full name
 - personal address
 - phone numbers
 - email address
 - gender
 - disability
 - billing details
 - concession status
 - other information required by State governments.
 7. One, or more personal identification is gathered will not be expired and will be in the form of:
 - a. Medicare card
 - b. Driver's Licence
 - c. Passport – Australian or international
 - d. Birth Certificate
 - e. Or other approved identification listed on the Skills First student declaration (Victoria)
 8. Personal information is collected for the purposes of meeting compliance and reporting requirements to comply with the law and governing authorities, researching and developing (and improving) our services and communications and to provide the services we promise.
 9. Personal information and identification will be collected for the purposes of creating and verifying the Unique Student Identifier (USI) for every student. Unnecessary identification supporting documents provided for the purposes of creating and verifying a USI will be confidentially destroyed if not required for other compliance requirements.
 10. Personal identification will be collected for the purposes of creating and verifying authenticity of the evidence of identification through a digital verification service (DVS). WBS will obtain consent from the student to access this service at the time of enrolment.
 11. When required, verification and authentication of concession entitlement will be sought through online secure portals. WBS will obtain consent from the student to access this service at the time of enrolment.

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- 12.** In the event WBS, through WPC Group, engages a third party contractor to perform services which involves handling personal information the contractor will be required to comply with the APPs.
- 13.** Images used will only be done so with the written consent of the student or person whose image appears.
- 14.** At all times any complaints in relation to privacy will be treated seriously, dealt with promptly and in a confidential manner. The WBS complaints and appeals policy applies in the event there is a complaint about privacy.
- 15.** The policy will be reviewed and updated at least every two (2) years and or when changes to legislation, government contracts or internal policy occur.
- 16.** Updates and changes to the policy are recorded in the continuous improvement register.

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Procedure

Collection of personal information

Staff

- 1.1. Personal information will be collected in accordance with the WPC Group privacy policy and specific personal information relating to Western Business School. Specific personal information may include Citizenship status, Driver's licence resumes, Certificates of Qualification, Police and/or Working With Children Checks if required.

Students

- 1.2. WBS 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.
 - 1.2.1. Personal information is collected at the time of enrolment from students to create and/or verify a USI which will be linked to the National VET collection. This personal information, once collected will be discarded by the RTO when no longer required.
 - 1.2.2. Students will be advised WBS will verify and authenticate their identification through a Digital Verification Service (DVS). Consent will be obtained from students and personal information, once collected will be discarded confidentially when no longer required.
 - 1.2.3. Students will be advised WBS will verify and authenticate any concession card presented for the purposes of accessing a reduced tuition fee. The concession card will be verified through Centrelink Confirmation eServices (CCeS) for businesses. Consent will be obtained from students and personal information, once collected will be discarded confidentially when no longer required.
 - 1.2.4. 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.
 - 1.2.5. All personal information is collected in writing, either hard copy or digital format, from an enrolment form other paperwork, or directly from the person whom the information is about to enable assessment of the suitability of the student to complete the course. Where applicable, information may be collected from the parent or guardian of a student under the age of 18.

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1.3. Access to personal information

- 1.3.1. Any person has access to their own personal files at any time, upon written request.
- 1.3.2. Staff and students may access their files by submitting their written application to Compliance and Administration Manager.

1.4. Storage and security of personal information

- 1.4.1. All reasonable steps are taken to maintain the privacy and security of personal information.
- 1.4.2. Information stored electronically is kept on a secure server and access is restricted to authorised employees. This server is regularly backed up.
- 1.4.3. Paper-based documents containing personal information are scanned and saved electronically in an individual student file on a secure server. Hard copies are placed into the confidential waste bin pending destruction.
- 1.4.4. When information is no longer required, it will be destroyed using confidential waste or by permanently purging electronic files.
- 1.4.5. Electronic files will be archived for minimum 3 years.
- 1.4.6. Records management policy is maintained by Western Business School.

1.5. Confidential Information

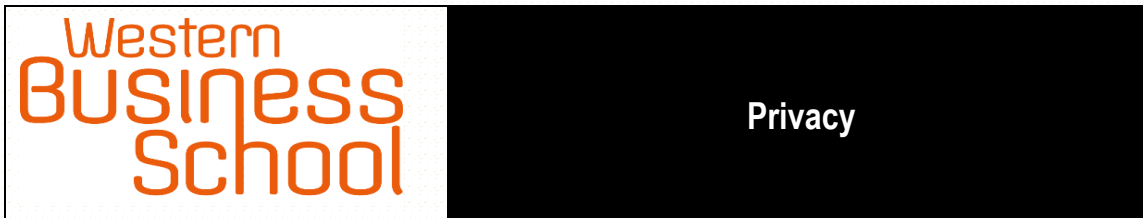
All reasonable efforts will be made to protect confidential information received from clients or partner organisations during the course of business operations. This information will not be disclosed without the prior consent of the client or partner organisation.

1.6. Notification of Privacy arrangements

- 1.6.1. Students and clients are advised:
 - of our Privacy Policy via the website wbs.org.au,
 - of our Privacy Statement via the Participant Information hand book,
 - of our Privacy Declarations and consent forms via the enrolment process,
 - via the enrolment form, we require and obtain consent to:
 - o collect, verify and create USI information,
 - o verify and authenticate evidence of identification
 - o verify and authenticate evidence of concession
- 1.6.2. Students are required to read, acknowledge and understand the Privacy statements outlined on the enrolment form by signing the declaration on the enrolment form.
- 1.6.3. Students read, acknowledge, understand and consent to WBS gathering personal information which will be used for the purposes of verification and or creating a

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USI, verifying identification and/or verifying concession entitlement by signing the enrolment form.

1.7. Privacy Statement

A privacy statement is made for all persons enrolling with WBS and outlines the way/s in which personal information is handled on the specific enrolment form in use at the time.

Related documents:

- Records Management
- Access and Equity policy
- Complaints policy Participant Handbook
- Enrolment form NSW
- Enrolment form Vic

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