

## Privacy Policy

### Purpose

This document describes BGT's policy regarding the collection, use, storage, disclosure of and access to personal information, including health information, in relation to the personal privacy of past and present staff and students and relevant others.

### Scope

This policy applies to personal and health information collected by BGT concerning staff, students, prospective students, individual clients and other individuals.

This policy has implications for all managers, staff, board members, students, apprentices and trainees, contractors and volunteers.

### Policy Statement

BGT complies with the privacy laws which include:

- The Commonwealth Privacy Act 1988
- Privacy and Data Protection Act 2014
- Freedom of information Act 1982

*It is policy that:*

- *The collection and use of personal and health information must relate directly to the legitimate purposes of BGT*
- *Individuals must be aware of, or informed of, the purposes for which personal and health information is obtained*
- *BGT will take all reasonable measures to ensure that the personal and health information it receives and holds is up to date*
- *BGT will take all reasonable measures to ensure that the personal and health information it receives and holds is up to date*
- *BGT will take all reasonable measures to store personal and health information securely*
- *Individuals are entitled to have access to their own records, unless prevented by law*
- *Third party access to personal and health information may only be granted in accordance with privacy principles and BGT policy and procedure*
- *BGT will amend records shown to be incorrect*

*BGT is bound by the Privacy Act 1988, which includes Privacy Amendment (Enhancing Privacy protection) Act 2012. BGT will only collect personal information for the purpose of providing services to clients as is necessary to fulfil our contractual obligations*

## Responsibilities

### 1. CEO

The CEO is responsible for ensuring that each manager is complying with their responsibilities in regard to privacy, as set out by the legislation discussed above (and any amendments or future versions of such legislation).

### 2. Line managers

Line managers are responsible for ensuring that their departments are compliant in their dealings with information, and the maintenance of privacy. This includes overseeing the staff within their department, and ensuring that documents are appropriately protected and stored so that client privacy is maintained.

Line managers must also ensure that they are protecting the personal information of their staff, as required by such legislation.

### 3. Staff

Staff are responsible for ensuring that they take actions to protect the information of students, and to raise any concerns regarding privacy and document management to their line manager.

## Actions

### Personal Information and Collection

BGT may be required to collect the following personal information for the purpose of fulfilling contractual obligations:

- Full name
- Tax file number
- Date of Birth
- Language(s) spoken
- Country of birth
- Disability Status
- Address
- Indigenous Status
- Telephone Number
- Education Achievements
- Contact Details
- Employment Details (past and current)
- Medical Assessments and Reports
- Police Checks (if applicable)
- Credit Card Details (if applicable)

BGT will collect personal information directly from the person it relates to. As a contracted service provider to the Commonwealth Government of Australia and Victorian State Government to provide education, training, employment and associated services, we may also collect personal information for the Commonwealth and State Government departments and funding bodies. BGT does collect personal information from the BGT Website. We use a third party to analyse traffic at the website. Information collected through such analysis is anonymous.

Consent for the collection of personal information is sought through relevant registration and consent forms, including but not limited to: Springboard Registration and Consent Form, Reconnect: Engagement and Learner Supports Registration Form (aged under 18 years and aged 18-24 years) and Consent to collect and disclose personal information (photographs & images of people).

When employing staff we will also collect personal information from other third parties such as:

- Current and/or previous employers
- Referees as nominated by the individual
- Working with Children Checks
- Police Checks

BGT will hold and use the personal information held for the sole purpose of providing and fulfilling a service. We will not disclose any person information unless:

- A consent form has been signed by the individual
- In accordance with any contractual obligations we must adhere to (eg: Government department requests such as Department of Social Services)

### **Protection of Personal Information**

BGT will take all reasonable steps to ensure that all personal information is held securely and protected from misuse, loss and unauthorised access.

This includes:

- IT Systems requiring password access to systems and databases and anti-virus protection in place
- Secure, lockable filing cabinets
- Staff training in Privacy and Confidentiality
- Site Alarm Systems
- Adhering to the Archives Act 1983 and any contractual obligations with regards to archiving and storage files

### **Accessing Personal Information**

We will require you to verify your identity and to specify what information you require. A fee may be charged for provision of access. We will advise you of the likely costs in advance. However, in the case of personal information we collect from our clients for the purposes of providing our services, access to that personal information will usually be the responsibility of the relevant client. For all requests made, a 'Request to Review Student File Form' must be approved by the Training Manager.

Access to personal information will be controlled at all times. A person requesting the information will be accompanied for the entire time they are in possession of their personal information by the Training Manager of BGT.

### **Student Privacy Statement**

BGT will display on our website the following privacy statement for clients/candidates:

When you apply to enrol as a student with BGT to undertake a course we are required to provide the Victorian Government, through the Department of Education and Early Childhood Development (DEECD), student information and training activity data which may include information provided on your enrolment form. This information is required to be provided in accordance with the Victorian VET Student Statistical Collection Guidelines.

The Department may use this information for planning, administration, policy development, program evaluation, resource allocation, reporting and/or research activities. For these and

other lawful purposes, the Department may also disclose information to its consultants, advisors, other government agencies, professional bodies and/or other organisations. You may also be contacted and requested to participate in a National Centre for Vocational Education Research survey or Department-endorsed project, audit or review.

It is essential that you keep your details up to date at all times and to contact BGT as soon as there is any change so you do not miss out on any important information about your current enrolment. We respect the personal information you supply to us and do our best to keep it safe and secure. We DO NOT pass this information onto marketing companies. For those students who are undertaking training as a result of a Registered Training Agreement (Traineeship or Apprenticeship) we will report on your progress to the employer or host employer.

### **Use of student images**

Students may be approached to participate in the marketing and promotion of BGT. Where a student consents to participate in promotion, they must have a signed consent form. This form is titled 'Consent Form – Personal Information' on the drive, and must be stored electronically.

Note: photographs are considered personal information under the Privacy and Data Protection Act 2014.

### **Recording of personal information**

BGT will ensure compliance of all privacy legislation and legal requirements. On commencement of services our privacy policy will be explained. BGT will be required to keep personal information on file for the purpose of providing services and to carry out statutory requirements. This information will be outlined on commencement of our services. Further information can be found by reading our Intellectual property, Copyright & Confidentiality Policy.

### **Complaint provision**

Any person who on reasonable grounds believes that BGT has breached this policy may make a complaint, in writing, to BGT's Privacy Officer specifying details of the alleged breach at the following address:

Quality & People Officer  
Email: [dylan@bgt.org.au](mailto:dylan@bgt.org.au)  
Phone: 03 5333 8600  
Postal Address: P.O. Box 308,  
Ballarat 3353 Victoria

It is requested that the written complaint be forwarded within six (6) months of the time the complainant first became aware of the breach. If a complaint is received after this time, BGT may not be able to investigate the complaint.

Complaints will be investigated in line with BGT's Complaints and Appeals Policy. BGT adheres to the Freedom of Information Amendment (Reform) Act 2010.

