

PP016 Privacy Policy and Procedure

Purpose

EmployEase by Healthcare Australia respects the privacy of the Personal Information that we hold. The purpose of this privacy policy is to give a clear understanding of the sort of personal information that EmployEase by Healthcare Australia holds and how we protect this critical information for our students.

Scope

This policy applies to all EmployEase by Healthcare Australia employees and students and our interactions with external organisation personnel.

Definitions

Personal information	<p>As defined in the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012.</p> <p>Information or an opinion about an identified individual, or a reasonably identifiable individual:</p> <ul style="list-style-type: none"> • whether the information or opinion is true or not; and • whether the information or opinion is recorded in a material form or not.
Sensitive information	<p>As defined in the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012.</p> <p>Information or an opinion about an individual's:</p> <ul style="list-style-type: none"> • racial or ethnic origin, • political opinions, • membership of a political association • religious beliefs or affiliations, • philosophical beliefs • membership of a professional or trade association, • membership of a trade union, • sexual preferences or practices, • criminal record, which is also personal information
The Department	Department of Jobs, Skills, Industry and Regions – Victoria

Policy Principles

EmployEase by Healthcare Australia takes students' privacy seriously and complies with all legislative requirements. These include the Privacy Act 1988, 2014 amendments, and the Australian Privacy Principles (APPs). This ensures that all students and clients' rights are protected by law.

Information is only shared with external agencies such as the RTO Manager to meet our compliance requirements as an RTO. All information is kept in the strictest confidence.

In some cases, we are required by law or the Standards for NVR Registered Training Organisations to make student information available to others such as the National Centre for Vocational Education and Research or ASQA. In all other cases, we will seek the written permission of the learner for such disclosure.

EmployEase by Healthcare Australia is committed to maintaining the privacy and confidentiality of its RTO personnel and student records. EmployEase by Healthcare Australia complies with the Privacy Act 1988 including the 13 Australian Privacy Principles (APPs) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

EmployEase may be required to provide information relating to trainee progress with

- The trainee's employer
- The Australian Apprenticeship Centre (AAC)
- The relevant state or federal government departments

The registering body, Australian Skills Quality Authority (ASQA), or funding body, the Victorian government, may require the release of your training records and personal information for the purposes of audit. There is a possibility that clients may:

- Receive a NCVET survey and/or
- An invitation to participate in a government department endorsed project and/or
- Be contacted for audit purposes by EmployEase's RTO Manager (or delegate) and/or state funding contract manager (or delegate).

EmployEase adheres to the Information Privacy Act 2000 and Privacy Act 1988 legislation which can be viewed at www.oaic.gov.au The main purposes of this Act are:

- to establish a regime for the responsible collection and handling of personal information in the Victorian public sector;
- to provide individuals with rights of access to information about them held by organisations, including information held by contracted service providers;
- to provide individuals with the right to require an organisation to correct information about them held by the organisation, including information held by contracted service providers;
- to provide remedies for interferences with the information privacy of an individual.

We will not release your records to a third party without your consent. Please apply to the National Vocational Training Manager if you wish to view your own records via admin@employease.com.au EmployEase provides information about the following to Students prior to enrolment, and is contained within the Enrolment form:

- Collection, use and disclosure of student data
- Survey participation
- Consequences of not providing your information
- Access, correction and complaints and appeals

Please note a breach of confidentiality includes unnecessary discussions with fellow students within and outside of the facility. Discussion via social networking such as Facebook, Instagram, Twitter, texting and email is a severe breach of this agreement and as it constitutes serious behavioural misconduct and will be viewed very seriously by EmployEase.

Placement Confidentiality Agreement

A Placement Confidentiality Agreement must be signed by all students prior to attending placement where placement is required such as, Diploma of Nursing (Clinical Placement Agreement) and Certificate III in Individual Support, and is located in the student’s logbook. Failure to sign this document will result in the cancellation of all clinical placement arrangements and may prevent a student from, or delay them, in obtaining their qualification. The Placement Confidentiality Agreement describes the following requirements for confidentiality while on placement:

- All people (clients, staff, and fellow students, contract workers) expect and are entitled to confidential, fair and respectful treatment of information relating directly to them. Students must be careful when talking to family, friends, both at home and in public places including social media. (Facebook, Instagram, Twitter, etc)
- Students must never use a client’s name. Another person may overhear them and know that person – this could be upsetting to them and contravene the conditions of the placement.
- It is of the utmost importance that every employee and work experience student observe strict confidence regarding personal information concerning clients, other students and/or staff. Any discussion or disclosure of records or information concerning clients, other students and staff or the facility generally is a serious breach of the facility’s trust and could lead to disciplinary action.
- All handover sheets from any facility are not to be taken off the premises during the course of each allocated shift and are to be destroyed by each facility policy protocols.

Placements are negotiated on behalf of students on an individual basis and the learning outcomes and experiences, which are provided for each student, may vary between each facility. Please note a breach of confidentiality includes discussions with other students within the facility. Discussion or comments either written or verbal on social media networking sites such as Facebook, Instagram, Twitter, texting, email, photographing or copying is a severe breach of this agreement and will be viewed by EmployEase as serious behavioural misconduct.

Procedure for All Programs

COLLECTION	
Steps	Responsibility
Personal information from EmployEase by Healthcare Australia students will be collected by fair and lawful means necessary for enrolment and functions of EmployEase by Healthcare Australia. EmployEase by Healthcare Australia is committed to ensuring the confidentiality and security of all information provided by learners and staff.	Course Advisor and Enrolment Officer

<p>In addition, EmployEase by Healthcare Australia’s privacy policy and procedure provides a framework and instruction to staff regarding how EmployEase by Healthcare Australia collects, stores, uses, and disseminates learner personal information with reference to the record management system and the Victorian Freedom of Information ACT (1982).</p> <p>EmployEase by Healthcare Australia must collect personal information as part of the enrolment process for training. This information may be personal and can include details of educational background, employment history, and current employment status, and language, literacy, and numeracy skills. The purpose of this information is to allow EmployEase by Healthcare Australia to develop effective training and assessment programs according to the needs of everyone.</p>	
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NOTIFYING THE INDIVIDUAL AT COLLECTION	
Steps	Responsibility
EmployEase by Healthcare Australia state the Victorian Government VET Student Enrolment Privacy Notice on both the website and enrolment form	Compliance Team

USE OF DATA	
Steps	Responsibility
EmployEase by Healthcare Australia is required to provide the Department with student and training activity data. This includes personal information collected in the EmployEase by Healthcare Australia enrolment form and unique identifiers such as the Victorian Student Number (VSN) and the Commonwealth’s Unique Student Identifier (USI). EmployEase by Healthcare Australia provides data to the Department following the Victorian VET Student Statistical Collection Guidelines, available at: https://www.standby.www.vic.gov.au/sites/default/files/2023-11/Victorian-VET-Student-Statistical-Collection-Guidelines-2024-v1.0-Nov-Revision-.pdf	Compliance Team
EmployEase acknowledges, and assists as required: <ul style="list-style-type: none"> The Department uses student and training data, including personal information, for a range of VET purposes including administration, monitoring, and planning. A student’s USI may be used for specific VET purposes including the verification of student data provided by EmployEase by Healthcare Australia; the administration and audit of VET providers and programs; education-related policy and research purposes; and to assist in determining eligibility for training subsidies. 	Compliance Team

DISCLOSURE OF YOUR DATA	
Steps	Responsibility
EmployEase acknowledges, and assists as required:	Compliance Team

<ul style="list-style-type: none"> as necessary and where lawful, the Department may disclose VET data, including personal information, to its contractors, other government agencies, professional bodies and/or other organisations for VET-related purposes. This includes disclosure of VET student and training data to the Commonwealth and the National Centre for Vocational Education Research (NCVER). 	
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LEGAL AND REGULATORY	
Steps	Responsibility
EmployEase acknowledges, and assists as required: <ul style="list-style-type: none"> The Department’s collection and handling of enrolment data and VSNs is authorised under the Education and Training Reform Act 2006 (Vic). The Department is also authorised to collect and handle USIs following the Student Identifiers Act 2014 (Cth) and the Student Identifiers Regulation 2014 (Cth). 	Compliance Team

SURVEY PARTICIPATION	
Steps	Responsibility
EmployEase acknowledges, and assists as required: <ul style="list-style-type: none"> Students may be contacted to participate in a survey conducted by NCVER or a Department-endorsed project, audit or review relating to your training. This provides valuable feedback on the delivery of VET programs in Victoria. 	Compliance Team

STUDENT CONSEQUENCES OF NOT PROVIDING INFORMATION	
Steps	Responsibility
Failure to provide required personal information may mean that it is not possible for students to enrol in VET and/or to obtain a Victorian Government VET subsidy.	Student, Course Advisor and Enrolment Officer

ACCESS, CORRECTION, AND COMPLAINTS	
Steps	Responsibility
Students have the right to seek access to or correction of their personal information. Students may also complain if they believe their privacy has been breached. For further information, students can contact EmployEase by Healthcare Australia’s Administration Team in the first instance by phone 03 9761 2156 or email admin@employease.com.au	Student, Course Advisor and Enrolment Officer

DATA QUALITY

Steps	Responsibility
EmployEase by Healthcare Australia will take reasonable steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.	Admin and Compliance Team

DATA SECURITY	
Steps	Responsibility
EmployEase by Healthcare Australia takes steps to protect the personal information we hold against interference, loss, unauthorised access, use, modification, or disclosure, and against other misuse. When no longer required, personal information is destroyed securely, or deleted following EmployEase by Healthcare Australia’s Records Management Policy.	Admin and Compliance Team

UNIQUE STUDENT IDENTIFIER	
Steps	Responsibility
<p>The personal details of individuals held by the Student Identifiers Agency will be protected by the Privacy Act 1988 (Cth). In addition, the Student Identifiers Act 2014 establishes a confidentiality scheme for the USI.</p> <p>USI legislation requires that EmployEase by Healthcare Australia keep all records concerning USIs protected from misuse, interference and loss, unauthorised access, modification, and disclosure. It also provides for the Australian Information Commissioner to investigate any breach of the USI confidentiality initiative as if it is an interference with the privacy of an individual for the Commonwealth Privacy Act.</p> <p>A USI must not be used for any purpose other than those specifically allowed under than the legislation.</p> <p>Refer to the Unique Student Identifier Policy and Procedure for further information.</p>	Admin and Compliance Team

ACCESS AND CORRECTION UNDER THE PRIVACY ACT	
Steps	Responsibility
<p>EmployEase by Healthcare Australia will grant an individual’s request for access to the personal information that EmployEase by Healthcare Australia holds about them.</p> <p>Individuals may also request that EmployEase by Healthcare Australia correct any personal information about the individual that EmployEase by Healthcare Australia holds. EmployEase by Healthcare Australia will only update the information if it is satisfied the information, it holds is incorrect.</p>	Admin Team

<p>If EmployEase by Healthcare Australia is satisfied that an individual’s personal information is incorrect, EmployEase by Healthcare Australia will take reasonable steps to correct that information to ensure that it is accurate, up-to-date, complete, relevant, and not misleading.</p> <p>A person requesting access to personal information will be accompanied for the entire time they have their personal information by the EmployEase by Healthcare Australia staff.</p> <p>For further information, students can contact EmployEase by Healthcare Australia’s Administration Team in the first instance by phone 03 9761 2156 or email admin@employease.com.au</p>	
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MARKETING, PRIVACY & DATA STORAGE	
Steps	Responsibility
<p>EmployEase would like to contact students, and potential students, about our products and services, as well as other content that may be of interest. Individuals can unsubscribe from these communications at any time by clicking ‘unsubscribe’ at the bottom of any email correspondence or by contacting us in writing, at admin@employease.com.au</p> <p>EmployEase by Healthcare Australia uses Hubspot CRM to store and manage enquires, applications, and part of enrolment data. This includes when an individual:</p> <ul style="list-style-type: none"> • interact with us on our websites or through other channels (for example, communicating with us or attending one of our courses and or events, contacting us via social media channels); • use our product and services <p>EmployEase by Healthcare Australia is committed to protecting and respecting privacy of all individuals, and we’ll only use personal information to administer a student’s account and to provide the products and services that are requested from us.</p> <p>Visit the Hubspot CRM privacy policy for further detailed information. https://legal.hubspot.com/privacy-policy</p>	<p>RTO Manager</p>

For further information about the way the Department collects and handles personal information, including access, correction, and complaints, go to:

<http://www.education.vic.gov.au/Pages/privacypolicy.aspx>

For further information about Unique Student Identifiers, including access, correction and complaints, go to:

<http://www.usi.gov.au/Students/Pages/student-privacy.aspx>

Records

All records related to this procedure are maintained as detailed in the Records Management Procedure.

Related Documents

Legislation and Standards	The Higher Education Support ACT 2003 (HESA); Amended 2014; Privacy Act 1988; Privacy Amendment (Enhancing Privacy protections) Act 2012; Information Privacy Act 2000 (Victoria); The Education and Training Reform Act 2006 Freedom of Information Act 1982 (VIC).
Reference Policies, Procedures and Supporting Documentation	<ul style="list-style-type: none"> Complaints and Appeals Policy and Procedure Records Management Policy and Procedure

Version control and accountability table

Accountable Area		Vocational Training		
Responsible Officer		Head of Education		
Approved by				
Head of Education				
Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
V2025.01	RTO Manager	Review and update role titles	29/01/2025	29/01/2025