

PRIVACY POLICY & PROCEDURE

Policy number:	20	Version:	8
Responsible Person:	CEO	Reviewed by:	CEO
Organisational Area:	Operational / RTO	Review Date:	9.9.26
Approved and adopted by:	Board of Governance	Next Review Date:	September 2029

Scope

This policy applies to North Ringwood Community House Inc. (NRCHI) Board of Governance, employees, trainers, assessors, volunteers, students and contractors and describes how NRCHI handles personal information relating to students, program participants, applicants, employees, volunteers, contractors, clients, patrons and other individuals whose personal information it collects or holds.

Objective

This policy explains how NRCHI collects, uses, stores, protects, discloses, accesses, corrects, retains and disposes of personal information.

NRCHI will handle personal information responsibly and in accordance with applicable privacy legislation, VET, VRQA, Skills First program requirements, government funding agreements and other legal and contractual obligations.

We are committed to protecting your personal information from misuse, loss, and unauthorised access. We implement reasonable safeguards, including physical, electronic, and procedural measures, to ensure the security of the personal data we collect.

All personal information is kept secure and only accessible to authorised staff and volunteers who need the information to perform their duties.

Applicable Legislation and Requirements

NRCHI will comply with privacy and information-handling requirements applicable to its activities, including, where applicable, the Privacy Act 1988 (Cth) and Australian Privacy Principles, the Privacy and Data Protection Act 2014 (Vic), the Health Records Act 2001 (Vic), the Spam Act 2003 (Cth), the Education and Training Reform Act 2006 (Vic), applicable VRQA requirements including the 2025 Standards for Registered Training Organisations, Skills First, Victorian VET data reporting requirements, government funding agreements and other applicable legislation and contractual obligations.

Definitions

Personal information means information or an opinion about an individual who is identified or reasonably identifiable, whether the information or opinion is true or not.

Sensitive information means a category of personal information that may include information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, professional or trade association membership, sexual orientation or practices, criminal record and health information.

Health information means information or an opinion about an individual's physical or mental health, disability or health services received.

Privacy breach means the loss, unauthorised access, use, disclosure, alteration or destruction of personal information, or other handling of personal information contrary to applicable privacy requirements.

Personal Information NRCHI Collects

The type of information NRCHI collects depends on the individual's relationship with NRCHI and the service or program being provided.

For students and program participants, this may include name, address, telephone number, email address, date of birth, gender, language spoken at home, country of birth, cultural background, emergency contact details, employment and education information, concession or eligibility information, Victorian Student Number, Unique Student Identifier, citizenship or residency information, government eligibility documentation, literacy and numeracy information, enrolment and attendance information, assessment results, learning support information, disability information, reasonable adjustment information and health information where reasonably necessary for participation or safety.

NRCHI may also collect photographs or video recordings where appropriate consent has been obtained.

For employees, volunteers and contractors, NRCHI may collect information such as contact details, emergency contacts, employment history, qualifications, certifications, tax and payroll information, superannuation details, bank account information, training records, performance information, workplace health and safety information, injury information, police checks and Working with Children Check information where relevant.

NRCHI will only collect information that is reasonably necessary for the relevant purpose.

How NRCHI Collects Personal Information

NRCHI may collect personal information through enrolment forms, online forms, student management systems, employment applications, contracts, telephone conversations, emails, interviews, face-to-face interactions, participation in programs and courses, assessment activities, support processes, emergency contact forms, the NRCHI website, funding bodies and authorised third-party providers.

NRCHI will collect information directly from the individual where reasonably practicable.

Information may also be collected from another organisation where this is authorised or reasonably necessary, including where required for government funding, VET reporting, regulatory compliance or other lawful purposes.

Why NRCHI Collects and Uses Personal Information

NRCHI collects and uses personal information to administer and deliver its education, training, community and employment activities.

This includes processing enrolments, maintaining student records, delivering training and assessment, providing student support, providing reasonable adjustments, allocating resources, managing emergencies, communicating with students and participants, administering employment and volunteer arrangements, processing payroll and superannuation, managing workplace health and safety, conducting recruitment and training, maintaining organisational records, improving services and meeting legal, regulatory, funding and contractual obligations.

Personal information may also be used for statistical reporting, research, evaluation, quality assurance and continuous improvement where authorised or required.



Policy & Procedure

NRCHI will not use personal information for unrelated purposes unless authorised by the individual or permitted or required by law.

Student Enrolment Privacy Notice

NRCHI provides students with the Victorian Government VET Student Enrolment Privacy Notice as required for Victorian VET enrolment.

NRCHI also provides its own Student Enrolment Privacy Notice explaining how NRCHI collects, uses and discloses student information following enrolment.

These notices form part of the NRCHI enrolment process and are provided together wherever practicable.

The Victorian Government specifically requires the Government privacy notice to be incorporated into enrolment forms and requires RTOs to provide their own notice explaining how student information is handled. The NRCHI Student Enrolment Privacy Notice provides information about student information collected for enrolment, training and assessment, student support, funding, VET regulatory requirements, government reporting and other authorised purposes.

Where enrolment is completed electronically, NRCHI will obtain an appropriate electronic acknowledgement confirming that the student's details are correct and that the student has acknowledged the applicable privacy notice.

VET, VRQA, Skills First and Government and Funding Requirements

As a registered training organisation, NRCHI is required to collect, maintain and report certain student and training information.

NRCHI may provide information to VRQA, Skills First, Victorian Government departments, Commonwealth Government departments, NCVER, funding bodies, auditors and other authorised organisations where required for VET regulation, funding, statistical reporting, monitoring, evaluation, auditing, quality assurance or other lawful purposes.

NRCHI will comply with applicable Victorian VET data collection requirements. Where information is used for statistical or evaluation purposes, NRCHI will use de-identified or aggregated information wherever reasonably practicable.

NCVER, USI and VSN Information

NRCHI will collect and report information required under applicable VET data reporting requirements.

This may include information required by NCVER and information relating to the Unique Student Identifier (USI) and Victorian Student Number (VSN).

Students will be informed through the applicable Student Enrolment Privacy Notice about the collection, use and disclosure of their information for national and Victorian VET data purposes.

NRCHI will handle USI and VSN information in accordance with applicable legislation and VET requirements.

Disclosure of Personal Information

NRCHI may disclose personal information where the individual has provided consent, where disclosure is reasonably necessary for the purpose for which the information was collected, where disclosure is required or authorised by law, or where disclosure is necessary to meet regulatory, funding, contractual, safety or other lawful obligations.

Depending on the circumstances, information may be disclosed to government departments, funding bodies, VRQA, Skills First, NCVER, auditors, regulators, trainers, assessors, authorised support personnel, emergency services, insurers, professional advisers, technology providers and other authorised service providers.

NRCHI will not sell or rent personal information to third parties for their own marketing purposes.

Employment and Volunteer Information

NRCHI collects and handles personal information relating to employees, volunteers and contractors for purposes including recruitment, employment administration, payroll, taxation, superannuation, training, performance management, workplace health and safety, WorkCover, insurance and compliance with employment obligations.

NRCHI will handle employment and volunteer information appropriately and confidentially.

Where applicable, NRCHI will also comply with the requirements of employment and workplace legislation, including the Fair Work Act 2009 (Cth) and applicable Victorian workplace requirements.

Access by Trainers and Authorised Personnel

Student personal information may be made available to authorised trainers, assessors and support personnel where reasonably necessary for the delivery, administration, assessment, support or safe operation of a student's course or program.

Access will be limited to information reasonably required for the person's duties.

Staff, trainers, assessors, volunteers and contractors must maintain the confidentiality of personal information and must not use or disclose information for purposes unrelated to their authorised duties.

Sensitive and Health Information

NRCHI may collect sensitive or health information where it is reasonably necessary for a specific purpose. This may include information required for participation in exercise or health-related programs, providing reasonable adjustments or learning support, managing an emergency, addressing workplace health and safety requirements or meeting legal obligations.

Where consent is required, NRCHI will obtain consent through an appropriate consent form or documented enrolment process.

Individuals may decline to provide health information where providing it is voluntary. However, where information is reasonably necessary to safely participate in an activity, failure to provide the information may affect NRCHI's ability to provide that activity safely.

Health information will be handled in accordance with the Health Records Act 2001 (Vic), where applicable.

If Personal Information Is Not Provided

Some personal information is necessary for NRCHI to provide courses, programs and services or to meet legal, regulatory and funding requirements.

If required information is not provided, NRCHI may be unable to process an enrolment, provide a particular course or program, determine eligibility for government-funded training, provide appropriate support or reasonable adjustments, safely provide an activity, meet VET reporting requirements or comply with funding and legal obligations.



Policy & Procedure

For employment applicants and employees, failure to provide required information may affect NRCHI's ability to process an application, administer employment, payroll, benefits, workplace safety or other employment obligations.

Security of Personal Information

NRCHI takes reasonable steps to protect personal information from misuse, loss, unauthorised access, modification and disclosure.

Electronic information is protected through appropriate security measures, which may include passwords, access controls, system security and backups.

Physical records are stored in secure areas and access is restricted to authorised personnel. *See NRCH Records Management Policy.*

Cloud and Overseas Service Providers

NRCHI may use third-party providers for email, cloud storage, accounting, website hosting, and other services.

Where personal information is handled by a third-party provider, NRCHI will take reasonable steps to ensure that appropriate privacy and security arrangements are in place.

Photographs and Media

NRCHI may take photographs or video recordings during classes, events and activities for legitimate organisational purposes.

Where identifiable photographs or recordings are to be used for promotional purposes, NRCHI will obtain appropriate consent through the *NRCHI Media and Photo Consent Form*.

Providing consent is voluntary and refusal will not affect an individual's access to NRCHI programs or services.

Direct Marketing

NRCHI may use contact information to communicate with individuals about NRCHI courses, programs, services, events and activities.

Marketing communications will be conducted in accordance with applicable privacy and marketing laws, including the Spam Act 2003 (Cth) where applicable.

Individuals may opt out of direct marketing at any time by using an unsubscribe facility or contacting NRCHI. NRCHI will process opt-out requests within a reasonable timeframe.

Access and Correction

Individuals may request access to personal information held by NRCHI and may request correction where they believe information is inaccurate, incomplete, out of date or misleading, subject to applicable legal exceptions.

Requests should be made in writing using the *NRCHI Access to Student Records Form*.

Requests will be managed in accordance with applicable legislation and the *NRCHI Access to Student Records Policy*.

NRCHI will take reasonable steps to ensure that personal information held is accurate, complete and up to date.

Retention and Disposal

NRCHI retains personal information for the period required by applicable legislation, VET regulatory requirements, funding agreements, taxation requirements, employment requirements, insurance requirements and other legal or contractual obligations.

When personal information is no longer required and there is no lawful reason for continued retention, NRCHI will securely destroy, delete or de-identify the information.

Physical records may be securely shredded and electronic information securely deleted in accordance with the *NRCHI Records Management Policy*.

Credit card information collected for payment purposes will not be retained and will be securely disposed of when no longer required.

Privacy Breaches

A privacy breach may involve personal information being lost, accessed, used, disclosed, altered or destroyed without appropriate authority.

Any staff member, volunteer, contractor or other person who becomes aware of a suspected privacy breach must report it promptly to the CEO.

NRCHI will investigate and take reasonable steps to contain the breach, assess the risk, prevent further unauthorised access or disclosure and implement corrective action.

Where applicable, NRCHI will comply with the Commonwealth Notifiable Data Breaches scheme, including notification to affected individuals and the Office of the Australian Information Commissioner where legally required.

Significant privacy breaches will be documented and reviewed to identify opportunities for improvement.

Privacy Complaints

Individuals who have concerns about how NRCHI has handled their personal information may make a complaint to the CEO.

NRCHI will investigate the complaint and take corrective action where appropriate.
Privacy complaints will be managed in accordance with the *NRCHI Complaints and Appeals Policy*.

Where a complaint cannot be resolved internally, an individual may have the right to complain to the relevant external regulator, depending on the legislation that applies.

Related Documents

- Student Handbook
- Student Enrolment Form
- Access to Student Records Policy
- Access to Student Records Form
- Complaints & Appeals Policy
- Enrolment Policy
- Records Management Policy
- Staff Code of Conduct
- Media Photo consent form
- Employment Policy



Policy & Procedure

Staff Handbook
Victorian Government VET Student Enrolment Privacy Notice
NRCHI Student Enrolment Privacy Notice

Related Legislation and Compliance

Victorian Registration and Qualifications Authority (VRQA) Guidelines - Standards for Vocational Education and Training Providers, including the 2025 Standards for Registered Training Organisations (RTOs)
Skills First program requirements and applicable VET Funding Contract
Applicable Commonwealth and State Government Funding Agreements, Contracts and Guidelines
Applicable VET legislation, data reporting requirements and regulatory instruments.
Health Records Act 2001 (Vic)
Privacy Act 1988 (Cth) - including the Australian Privacy Principles
Privacy and Data Protection Act 2014 (Vic)
Spam Act 2003 (Cth)
Education and Training Reform Act 2006 (Vic)
Charter of Human Rights and Responsibilities Act 2006 (Vic)
Fair Work Act 2009 (Cth),

Document Locations

Electronic file folders accessible by NRCH Administration staff
Policy and Procedure Manual
Website

Date reviewed	Version	Details of changes (if any)	Date of next review
29.3.2021	V2	Removed all reference to crèche	March 2024
		Changed reference to retaining credit card information	
28.11.2023	6	Related Documents updated	November 2025
21.5.25	7	Significantly reformatted. More information added for employee privacy	May 2025
9.9.26	8	Updated to reflect current legislation and data reporting requirements and changes to VRQA Guidelines and 2025 Standard for RTOs	September 2029