

1. Overview

The John Henry Institute (JHI) is committed to meeting all of the legal obligations expressed in legislation relating to Information Privacy. This policy outlines how JHI uses and manages personal information of students; provided to or collected by it.

JHI will comply with all applicable Australian privacy laws, including the *Privacy Act 1988* (Cth) (Privacy Act), in relation to the collection, use and disclosure of personal information of all students.

This policy will be reviewed regularly, and if required, updated, to ensure it remains accurate and appropriate.

2. Definitions

Personal Information: means information or an opinion about an identified individual, or an individual who is reasonably identifiable; whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not. Examples: name, address, telephone number, title.

Sensitive Information: means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or membership of a trade union, sexual orientation or practices, or criminal record that is also personal information or health information about an individual, or genetic information about an individual that is not otherwise health information, or biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or biometric templates.

3. Authority to Collect and Store Information

JHI is a delivery site for the Registered Training Organisation 7054 Catholic Schools Office, Lismore Diocese, as approved by the Australia Skills Quality Authority. This registration is issued under the authority of the *National Vocational Education and Training Regulator Act 2011*. This legislation requires JHI to collect personal and sensitive information from its students. This requirement is specified in the *Data Provision Requirements 2012* which is one of five legislative instruments that JHI must comply with as a condition of its registration.

The data provision requirements require JHI to collect data from students in accordance with the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS). The Standards for Registered Training Organisations require JHI to retain and store this information for up to 30 years and to report training activity to government agencies in accordance with mandatory reporting requirements.

Together these requirements form a statutory obligation to collect, store and report information of any student participating in nationally accredited training. The publications referred to in this section can be accessed from the ASQA website.

4. Collection and Use

JHI collects personal information, including sensitive information, about prospective and current students, parents/guardians/care-providers. The purposes for collection is to:

- enable JHI to conduct our business and deliver education services;
- meet our national/and state reporting requirements, legal accountabilities and financial management; and
- meet the requirements of relevant legislation.

Prior to, or at the time of collecting personal information, JHI will take reasonable steps to advise the individual concerned what information is being collected and held, the purpose for holding the information and how the information is to be used or disclosed.

As well as:

- that they may have access to the information;
- how to contact JHI to gain access;
- the purpose(s) for which JHI collect the information;
- the name and/or type of organisation to which JHI may disclose the information;
- if the information is required by law/or legislation; and
- any consequences if the person fails to provide all or part of the information.

The types of personal information that JHI collects from students, prospective students and past students may include:

- Name, date of birth and gender
- Contact details (address, email, phone and mobile details)
- Unique Student Identifier (USI)
- Student identification numbers
- Photographic identification
- Qualifications, history and progress
- Information relating to entitlements related educational government payments or support (e.g. VET, Smart and Skilled)
- Any evidence provided as part of a student enrolment e.g. Medicare card details
- Complaints or misconduct details or information
- Working With Children checks or National Police Checks if related to course or employment
- Information necessary to deliver a health or disability service if necessary to deliver that service

When enrolling into accredited programs JHI is obligated to obtain Australian Vocational Education and Training Management of Information Statistical Standard data which includes:

- Whether you are Aboriginal or a Torres Strait Islander; and

- Whether you have a disability.

JHI collects personal information through:

- its website, including through online enquiry forms and cookies;
- enrolment, registration and attendance at event or training sessions;
- the provision of customer service and support, including dealings you may have with a JHI staff member;
- requests for brochures, to join a mailing list or to be contacted for further information about JHI's services;
- responses to surveys or research conducted by JHI or on JHI's behalf;
- social media and other external websites; and
- employment applications.

5. Disclosure of Personal Information

JHI does not disclose personal information other than for the purpose for which it was collected, or an individual has consented to a secondary purpose, or an individual would reasonably expect this (such as receiving communications about upcoming events), or if required by law.

JHI may share personal information with the Commonwealth and NSW government in accordance with Commonwealth and NSW contractual obligations. In these circumstances JHI will take reasonable steps to inform and seek consent from the individuals concerned and take all reasonable steps to ensure that the recipient handles the personal information according to the Australian Privacy Principals.

JHI does not sell its mailing lists to third parties for marketing purposes.

JHI does not disclose personal information to overseas recipients.

6. Access and Correction of Personal Information

Individuals may, subject to the exceptions prescribed by the Australian Privacy Principles, request access to and correction of their personal information where this is collected directly from individuals by JHI. Requests will be answered within fourteen (14) business days.

All enquiries should be in writing and sent to:

Email: info@jhi.edu.au

Post: JHI Privacy Officer, PO Box 2854, Port Macquarie NSW 2244

JHI may require that you provide sufficient identification before allowing you to access the personal information held about you. If JHI is required or authorised by law to do so, it may refuse to provide you with access to this information.

7. Security of Personal Information

The security of information is important to JHI and we will take all reasonable precautions to protect personal information from misuse, loss, unauthorised access, modification or disclosure. Some of the ways we protect personal information include:

- premises security;
- restricted access to personal information to staff who need it to perform their day to day functions;
- maintaining technology products to prevent unauthorised computer access including identifiers and passwords; and
- maintain physical security over paper records.

8. Complaints and Concerns

JHI is committed to providing a fair and responsive system for handling and resolving complaints. If at any time you wish to lodge a complaint in respect of the handling, use or disclosure of your personal information by JHI you may do so by completing a Notification of Complaints Form and submit it to:

Grievance Officer

John Henry Institute

PO Box 2854

Port Macquarie NSW 2444

Alternatively, you may email it to: info@jhi.edu.au

JHI will investigate your complaint and will use reasonable endeavours to respond to you as soon as possible, but no later than thirty (30) days after receiving your complaint.

If JHI fails to respond to your complaint or if you are not satisfied with the response that you receive from JHI, you may contact:

Sue Watts – VET Manager

Catholic Schools Office, Lismore Diocese

PO Box 158

Lismore NSW 2480

If you remain dissatisfied, you may have the right to make a complaint to the Office of the Australian Information Commissioner (OAIC).