PRIVACY POLICY

RELEVANT STANDARD(S):

Standards for Registered Training Organisations (RTOs) 2015	*Clause 4.1* *Clause 7.5* *Clause 8.2, 8.5*

PURPOSE

High Risk Training Academy is committed to maintain the privacy of personal information provided by staff and clients in accordance with the requirements of the 'Standards for Registered Training Organisations (RTOs) 2015' and Australian Privacy Principles of the Commonwealth Privacy Act 1988.

POLICY PRINCIPLES

This Policy will be made publicly available.

High Risk Training Academy is committed to the Australian Privacy Legislation and this policy describes how it will comply with the:

1. Commonwealth Privacy Act 1988,
2. Privacy Amendment (Enhancing Privacy Protection) Act 2012,
3. Data Provision Requirements 2012
4. Standards for Registered Training Organisations (RTOs) 2015
5. Student Identifiers Act 2014
6. and Australian Privacy Principles (APP)

in the way it collects, uses, secures and discloses personal information.

Data Collection on Website

1. High Risk Training Academy lawfully collects personal information that is necessary both for appropriate marketing and promotional information sent to potential clients, and the marketing and promotion of products and services of third parties elected by High Risk Training Academy for the purpose disclosed at the time of collection and other purposes set out in this Privacy Policy.

2. By providing the limited personal information on High Risk Training Academy website, any other website promoting our products and services, or through other means, clients and potential customers agree to allow High Risk Training Academy and other third parties elected by High Risk Training Academy to send out marketing materials including, but not limited to their promotions and special offers, product information, information about services, newsletters, and other forms of communication from time to time.

3. We will disclose basic information that we gather about our staff or students only to third parties that we elect as having potentially relevant or useful products and services to them. We use the information collected only for the services we provide and the third parties we elect. Email addresses, phone numbers, product enquiry information, and first and last names may be shared with a third party

elected by High Risk Training Academy however no other staff or student information is shared with another organisation unless required by Commonwealth and State Government authorities and agencies.

4. If staff or student information is required or requested by any third party outside of those which High Risk Training Academy elects, we will obtain written consent from the relevant staff or student prior to release of any information. Should staff or students seek access to their information, they will be asked to supply their name, date of birth and address as identification before this can occur.

Data Collection to Provide Training and Assessment Services

1. In order to provide training and assessment services, High Risk Training Academy lawfully collects personal information from students that is necessary for statistical, administrative, regulatory and research purposes.

2. Under the Data Provision Requirements 2012, High Risk Training Academy is required to disclose this personal information to the National Centre for Vocational Education Research Ltd (NCVER), and to Commonwealth and State or Territory government departments and authorised agencies.

3. Information collected may include, but is not limited to:
    a. Full name
    b. Address
    c. Contact details (telephone and email)
    d. Date of Birth
    e. Gender
    f. Cultural Background
    g. Country of birth
    h. Language spoken at home
    i. Disability information
    j. Highest schooling completed
    k. Other qualifications completed
    l. Current employment status
    m. Study reasons
    n. Unique Student Identifier (USI)

4. High Risk Training Academy will only collect personal information by fair and lawful means.

5. The enrolment form completed by clients contains a disclaimer outlining why the personal information is collected and how it is to be used. Clients are required to sign the disclaimer as their agreement to the use of their personal information.

Unique Student Identifier (USI)

1. In the instances when High Risk Training Academy applies for USIs on behalf of students, authorisation from students must be received prior.

2. In accordance with section 11 of the Student Identifiers Act 2014, High Risk Training Academy will securely destroy personal information which we collect from individuals solely for the purpose of applying for a USI on their behalf as soon as practicable after we have made the application or the information is no longer needed for that purpose, unless we have been required by or under a law to retain this information.

3. Under Standard 3.6 (d) of this Act, we are required to ensure the security of the USI and all related documentation under our control, including information stored in our student management systems.

Unsolicited Information

1. Unsolicited information received by High Risk Training Academy is afforded the same privacy protection as solicited personal information.

2. If unsolicited information is received by High Risk Training Academy, and takes initiative to determine whether it could have collected the information through its various data collection channels. If received information is identified as deliberately obtained by High Risk Training Academy, it will, in the handling of the information, comply to the principles of this document and the relevant legislations on data privacy.

3. Information identified as not solicited by High Risk Training Academy will be destroyed or de-identified as soon as practicable, provided such actions are lawful and reasonable, and the information is not contained in a Commonwealth record.

Use and Disclosure

1. By providing personal information to High Risk Training Academy on the website, any other website promoting our products and services, or through other means, clients and potential customers agree to allow High Risk Training Academy and other third parties elected by High Risk Training Academy to send out marketing materials including, but not limited to their promotions and special offers, product information, information about services, newsletters, and other forms communication from time to time.

2. Individuals are notified every time High Risk Training Academy obtains information. Notification may be done prior to the respective channel/s, such as the website or fill-out forms, where the individual discloses relevant information prior to or immediately after data collection. The individual may opt to refuse requests for personal information through the channel where information is being obtained.

3. High Risk Training Academy will inform the individual whether information provided may be used for domestic or international audiences. Where High Risk Training Academy identifies that information may be used for cross-border or international purposes:

    a. High Risk Training Academy assumes responsibility of its elected international or cross-border recipients. They are bound by the same legislations, and principles as stipulated in this document. As such, any breach of the Australian Privacy Policy by international recipients is taken to be a breach of the Australian Privacy Policy by High Risk Training Academy**.**

    b. Prior to disclosing personal information to an overseas recipient, High Risk Training Academy will inform the individual of the location of these overseas recipients.

    c. High Risk Training Academy will follow reasonable steps to ensure that the recipient does not breach the Australian Privacy Principles and the stipulations of this policy.

    d. High Risk Training Academy may choose not to apply the provisions of the cross-border disclosure following consent from the individual.

    e. Regardless of High Risk Training Academy or the individual's (i.e. student / potential students) discretion, cross-border disclosure is imposed if required by Australian law, or a court/tribunal order.

4. High Risk Training Academy uses the limited information collected for either marketing and promoting our products and services, or marketing and promotion of the products and services of third parties elected by High Risk Training Academy, for the purpose disclosed at the time of collection and other purposes as set out in this Privacy Policy. High Risk Training Academy will not use personal information for any other purpose without first seeking consent, unless authorised or required by law. Generally, High Risk Training Academy will only use and disclose personal information:

    a. To establish and maintain the relationship to High Risk Training Academy

    b. To promote and market its products and services

    c. To provide the products and services requested from High Risk Training Academy and other learning providers in which you enrol or apply to enrol

    d. To promote and market the products and services of third parties elected by High Risk Training Academy that may have products and services of interest to clients and potential customers

    e. To administer and manage those products and services

    f. To comply with Commonwealth and State Government laws and regulations.

    g. To report to National Registering Bodies in relation to training services provided.

h. High Risk Training Academy will only use or disclose personal information for direct marketing purposes where the individual has either consented to their personal information being used for direct marketing or has a reasonable expectation that their personal information will be used for this purpose, and conditions relating to opt-out mechanisms are met.

5. Access to student personal information beyond that shared with third parties for promotional purpose (email addresses, phone numbers products, product enquiry information and first and last names) is available on application through the Administration Team of High Risk Training Academy. Access to personal information will be controlled at all times. A person requesting any information will be accompanied for the entire time they are in possession of their personal information by the Administration Team of High Risk Training Academy.

6. Students have the option to request no further contact from High Risk Training Academy or one of High Risk Training Academy's elected third parties by clicking the "UNSUBSCRIBE" link provided on emails received.

7. Where the potential student / student prefers anonymity, we permit an individual to interact with High Risk Training Academy without identifying themselves or by using a pseudonym. Exceptions apply, however, in situations where anonymous interaction may be deemed as impracticable. In such cases, High Risk Training Academy will inform the individual that, for purposes of clarity, accuracy and the like, communication may be resumed in more exclusive channels, such as emails, SMS, telephone, or whichever the individual finds suitable.

Agents, Contractors and Other Third Parties

Our agents, contractors and other third parties, who require personal information to provide a legitimate service, are also bound by these terms of privacy to ensure that client and participant personal information remains protected at all times

Use of Internet

The internet may be used to transmit client and participant personal information from delivery sites to other sites and to state/federal registering bodies. Security of data transmitted to state and federal registering bodies is managed by the respective bodies and we have taken all reasonable steps to protect and secure personal information when using the internet.

Data Quality

We will ensure that personal information is accurate, complete and up to date. Clients and participants are encouraged to help us keep their personal information accurate, complete and up to date by contacting and informing us of any changes.

Access to Records

1. All students who have provided a verified USI (unless exempt), and whose results have been reported into the national VET provider collection, will be able to access their records through the USI system (for units and awards obtained after 1 January 2015). If a student's achievements have not been recorded through the USI system, they may access their records through written request with High Risk Training Academy's Student Services Team.

2. High Risk Training Academy will not disclose information that we gather about our student to any third party (apart from those exceptions previously stated.)

3. If student information is requested by third party, we will require authority from the relevant student prior to release of any information. Students will be asked to supply their name, date of birth and address as identification before this authority can be given. This authority will be kept on the Student Profile for as long as the student endorses it.

4. Should staff or students seek access to their information, they will be asked to supply their name, date of birth and address as identification before this can occur. Access to student personal information is available on application through the Administration Team of High Risk Training Academy. Access to personal information will be controlled at all times.

Correction of Records

High Risk Training Academy follows reasonable steps to correct information, without additional charge and within 10 business days of request, to ensure that information held serves its purpose, that it is accurate, up-to-date, complete, relevant and not misleading. High Risk Training Academy may initiate amendment of personal information held if:

1. High Risk Training Academy is satisfied that the information held is inaccurate, out-of-date, incomplete, irrelevant or misleading.

2. The individual to whom the personal information relates to requests the organisation to correct the information.

If High Risk Training Academy corrects personal information about an individual that it has previously disclosed to another APP entity, High Risk Training Academy will take reasonable steps to notify the other APP entity of the correction, where that notification is requested by the individual will likewise notify other entities.

Where High Risk Training Academy refuses to correct personal information of an individual, High Risk Training Academy will send a written notice to the individual requesting the amendment indicating the reason for refusal, the mechanism available to complain about the refusal and any other matter prescribed by regulation.

High Risk Training Academy will likewise indicate in its records that the information held is inaccurate, out-of-date, incomplete, irrelevant or misleading in a way that is apparent to the users of the information.

Records Retention of Student Data

1. High Risk Training Academy will retain sufficient data to be able to reissue a qualification or statement of attainment for a student for 30 years.

2. If High Risk Training Academy ceases being an RTO, we will provide this information to ASQA in digital form.

Privacy Concerns

Clients are able to raise any concern they may have regarding personal information handling practices by contacting our administration staff.

MONITORING AND IMPROVEMENT

The CEO of High Risk Training Academy is responsible for all continuous improvement processes in relation to the privacy policy and procedure and ensuring that all staff, including those from third party providers are complying with the provisions of this policy.

VERSION CONTROL

Version Control Table					
Date	**Summary of Modifications**	**Modified by**	**Version**	**Date of Implementation**	**Next Review Date**
Date	Document creation	360RTO Solutions	v. 1.0	20/06/2024	19/06/2025

RTO INFORMATION

RTO INFORMATION	
Document Name	Privacy Policy v1.0
RTO/Company Name	High Risk Training Academy
ABN	27 666 710 925
RTO Code	#46215
Phone	0410 867 367
Email	info@hrtawa.com.au
Manager	CEO
Website	www.hrtawa.com
Address	31 Vigilant Terrace, Ocean Reef WA 6027