

New Horizons Safety and Training Services is committed to maintaining compliance with the obligations under the *Privacy Act 1988*, and the associated Australian Privacy Principles (APP's) outlined in the amended *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. Specifically, in the way it collects, uses, secures and discloses the personal information of clients and stakeholders.

As a Registered Training Organisation operating in Australia, New Horizons Safety and Training Services is required to collect personal information from all participants that may be disclosed to Australian Commonwealth and State Government Agencies and Authorities such as:

- Australian Skills Quality Authority (ASQA)
- National Centre for Vocational Education Research (NCVER)

New Horizons Safety and Training Services takes pride in the management of personal information, implementing a framework in accordance with The Australian Privacy Principles.

Australian Privacy Principle 1: Open and Transparent Management of Personal Information

New Horizons Safety and Training Services requires specific personal information to be provided by all participants engaging in services with the RTO. This information is collected, used, retained, and disclosed for a range of purposes, including but not limited to:

- The provision of services to clients
- The management of employee and contractor teams
- The promotion of products and services
- For utilisation in internal business functions and activities
- Stakeholder requirements

The legislative instruments outlining the requirements for Registered Training Organisations to collect, hold, use and disclose personal information of participants enrolled in nationally recognised training programs are as follows:

- *Student Identifiers Act 2014*
- *Standards for Registered Training Organisations (RTOs) 2015*
- *Data Provision Requirements 2012*
- *National VET Data Policy*

New Horizons Safety and Training Services is bound also by State Government Acts that require similar information to be collected, used, and disclosed. Furthermore, the delivery of services through Commonwealth and State Government funding contract agreement arrangements also require specific information to be collected, used and disclosed.

In regard to the approach taken in collecting personal information, New Horizons Safety and Training Services utilises forms (enrolment forms, participant details forms, etc.) and also web-based systems. There are different kinds of personal information collected and held, such as:

- Contact details

- Employment details
- Identity information
- Educational backgrounds
- Demographic information
- Indigenous status
- Disability status
- Course progress and achievement information
- Financial billing information

New Horizons Safety and Training Services' approach to retaining personal information includes robust storage and security measures at all times. Information is stored in secure, password protected student and financial management systems, and hard copies are stored in secure facilities with authorised access only. System access is only authorised to personnel whom require the information for their role.

New Horizons Safety and Training Services ICT systems are hosted internally with robust internal security to physical server locations and server systems access. Virus protection, backup procedures, and ongoing access monitoring procedures are in place.

In addition, personal information hard copies are destroyed as soon as practicable through the use of professional shredding and destruction services.

Australian Privacy Principle 2: Anonymity and pseudonymity

Where practical and possible, New Horizons Safety and Training Services provides individuals with the option of remaining anonymous or being identifiable through a pseudonym. In an instance where an individual's identity is not necessary, such as generic enquiries, New Horizons Safety and Training Services allows individuals to use a name, term, or descriptor different to their actual name.

Under ASQA requirements relating to rules of evidence, New Horizons Safety and Training Services requires all course participants to present valid Government issued identification. This requirement has been derived from the need for authenticity and verification that the person enrolled, trained and assessed is the same person that will be issued with a qualification or statement of attainment.

Australian Privacy Principle 3: Collection of Solicited Personal Information

The collection of personal information is limited to what is reasonably necessary for New Horizons Safety and Training Services business activities. We only collect sensitive information in cases where the individual consents to the information being collected. An exemption to this is where the information is required by law to be collected. All information is collected by lawful and fair means.

Australian Privacy Principle 4: Dealing with Unsolicited Personal Information

In the event that New Horizons Safety and Training Services receives unsolicited personal information and has taken no active steps to collect said information, it is first determined if this information could have been collected for business purposes. Where this is the case, New Horizons Safety and Training Services may hold, use and disclose the information appropriately.

If the information collected does not meet requirements (by law or for a valid business purpose), New Horizons Safety and Training Services immediately destroys or re-identifies the information (unless it would be unlawful to do so).

Australian Privacy Principle 5: Notification of the Collection of Personal Information

Reasonable steps are taken to ensure the individual is aware of the purpose for the collection of personal information by New Horizons Safety and Training Services. Where possible, it is ensured that the individual confirms and acknowledges their understanding through various methods such as that of signed documentation.

Australian Privacy Principle 6: Use or Disclosure of Personal Information

New Horizons Safety and Training Services will not use or disclose personal or sensitive information other than what is required to conduct primary business activities. In an instance where personal information is used or disclosed for secondary purposes:

- It is ensured the participant has given written consent (please see s.12 Participant Details Form)
- It can be reasonably expected by the individual that the secondary use or disclosure is directly related to the purpose of collection
- The use or disclosure of the information is required or authorised by law

Where New Horizons Safety and Training Services is required to use or disclose personal information for “enforcement related activities”, a written note of the use or disclosure will be constructed, and include the following:

- The date of use/disclosure
- The personal information used/disclosed
- The enforcement body
- How the organisation has used the information
- The basis for our reasonable belief the information needed to be disclosed

Australian Privacy Principle 7: Direct Marketing

New Horizons Safety and Training Services does not engage in any direct marketing practises, and therefore does not use or disclose personal information collected for this purpose. In the instance that an individual requests us at any stage not to use or disclose personal information for the purpose of direct marketing, New Horizons Safety and Training Services will ensure the request is fulfilled and any required actions are taken promptly.

Australian Privacy Principle 8: Cross-Border Disclosure of Personal Information

New Horizons Safety and Training Services does not disclose any of the personal information collected and retained to any overseas recipient.

Australian Privacy Principle 9: Adoption, Use or Disclosure of Government Related Identifiers

Government related identifiers are not adopted, used, or disclosed by New Horizons Safety and Training Services except in the instances where:

- It is a requirement by Australian law or other legal requirements
- It is reasonably necessary to verify the identity of the individual
- It is reasonably necessary to fulfil obligations to an agency or a State or Territory authority
- It is required under the prescription of any regulations

Australian Privacy Principle 10: Quality of Personal Information

Reasonable steps are taken to ensure that the personal information collected for use and disclosure by New Horizons Safety and Training Services is accurate, up-to-date, and complete. This is particularly important in the instances of initially collecting the personal information, and when the information is used or disclosed.

Australian Privacy Principle 11: Security of Personal Information

New Horizons Safety and Training Services takes all reasonable steps to ensure the security of personal information collected and retained. Such protection secures information against loss, damage, unauthorised access, use, modification or other misuse. Access to offices and document storage facilities is restricted to New Horizons Safety and Training Services personnel only, and any visitors must be authorised and accompanied at all times.

Documentation that contains personal information that is no longer required for any purpose, is destroyed or de-identified by New Horizons Safety and Training Services.

New Horizons Safety and Training Services further ensures the security of personal information through conducting ongoing internal audits of the adequacy of practices and systems implemented. In addition, security issues, practises, procedures and expectations are regularly addressed and reiterated to employees.

Australian Privacy Principle 12: Access to Personal Information

New Horizons Safety and Training Services provides individuals with access to their retained personal information upon request. Prior to releasing any personal information, it is confirmed that the individual making the request is the individual associated with the information or is someone authorised to make a request on their behalf. No other parties will have access to your personal information unless your written permission has been received. Information access is provided free of charge; however, the request of copies may incur nominal fees.

Australian Privacy Principle 13: Correction of Personal Information

New Horizons Safety and Training Services takes reasonable steps to correct personal information held in cases where it is apparent that the information is inaccurate, out-of-date, incomplete, irrelevant, or misleading. New Horizons Safety and Training Services may become aware of the need for correction through the availability of updated information, notification from third parties, or by request.

The Privacy Act states that you may request to make corrections to your personal information held at any time. In order to request this, please contact New Horizons Safety and Training Services on 07 4927 0666.

Photography and Video Privacy


In order for New Horizons Safety and Training Services to document, demonstrate, and provide authenticity and validity of training and assessment programs, a staff member may take photographs or record elements of your training program. These photos and/or videos will be used solely for meeting regulatory requirements and marketing the business practises of NHST. They will not be used for any other purpose without your written permission. For promotional purposes, these photos or videos may appear on our website, in newspapers, magazines and other forms of media.

Complaints

You can lodge a complaint in writing with New Horizons Safety and Training Services regarding how the RTO has handled your personal information or if there is believed to be any breach of the Privacy Act. This complaint will be responded to in accordance with New Horizons Safety and Training Services complaints policy.



Managing Director



Date