

# Privacy Policy

**Document ID:** PRIP

**Approved by:** CEO

**Approval Date:** 01.02.2017

## 1 Introduction

National Training Masters (NTM) is committed to protecting the privacy of staff, students and community members – keeping all personal information safe and ensuring the security of our information and data. This includes our obligations under NSW and federal laws that relate to how, as a Registered Training Organisation (RTO), we collect, use, hold, store, disclose and destroy personal information.

## 2 Purpose

NTM handles your personal information in accordance with the following:

Privacy and Personal Information Protection Act 1998 (NSW)  
Health Records and Information Privacy Act 2002 (NSW)  
Privacy Act 1988 (Cth) where applicable, and  
Australian Privacy Principles (APPs - Cth)  
Information Protection Principles (IPPs - NSW)  
National VET Data Policy (Cth)  
Student Identifiers Act 2014 (Cth)

National Training Masters (NTM) (ABN 28 108 511 093) is an RTO under the jurisdiction of the Australian Skills Quality Authority (ASQA). Bombohill Pty Ltd is the legal name of National Training Masters. As an RTO, we ensure the integrity and security of all personal information we collect from our students and staff. As a Smart and Skilled provider in NSW, we also fall under the jurisdiction of the NSW Government and the Department of Education as part of our funding obligations.

## 3 Scope

This Policy applies to all workers, ie employees, teachers, managers, and anyone else who carries out work for NTM, such as contractors, on-hire workers, volunteers and others who will have access to private student and staff details. In addition, visitors to our website may have information regarding their IP and geolocation collected as part of their interaction with NTM's website.

We collect personal information from our students for several reasons, mainly to meet the data collection for state and federal reporting requirements.

As a registered training organisation (RTO), NTM needs to collect and report 'Total VET Activity' data against the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) in accordance with the National VET Data Policy.

As NTM is also a Smart and Skilled Provider, we collect data, including enrolment information and eligibility criteria, to meet the reporting requirements of State Training Services and the NSW Department of Education.

## 4 Policy Statement

NTM takes your privacy seriously. We are committed to protecting your personal information and fostering a culture of transparency and compliance in all our activities, including education, research, engagement, and administration. You have control over your data. NTM empowers you to manage your personal information. You have the right to request a copy of your personal data, update or rectify any inaccuracies in your information, receive your data in a transferable format, limit the processing of your personal data and opt out of specific uses of your information.

## 5 General Responsibilities, Accountability and Authority

While NTM and its management bear overall responsibility for privacy, each worker has individual responsibility for their own behaviour in the workplace and for creating a positive privacy culture. Managers and workers will be held accountable for implementing NTM's privacy systems in their area of responsibility and for taking reasonable care of all student records.

All personal information collected by NTM will not be used or disclosed to a third party, except as required for compliance and reporting purposes.

### 5.1 Personal information

The type of personal information that we may collect and hold about you will depend on the nature of our dealings with you, and it may include:

- identification and contact information, including your name, address, date of birth, gender and citizenship status;
- health information and other sensitive information, including information about your racial and ethnic origin;
- information about your education and other related information if you are a student registered with us, including unique student identifier and course details;
- information about your employment history;
- location information, including IP address and third-party sites you access while using NTM facilities and systems; and
- information about how you use our products and services, including information you provide when giving feedback or in response to surveys or competitions.

## 5.2 Collection, use or disclosure of personal information

As identified above, all personal information collected by NTM will only be used or disclosed to a third party in accordance with the IPPs.

As part of NTM's Terms and Conditions of Enrolment and Registration, enrolling students are provided with details of the range of purposes for which NTM can use or disclose (to a third party) a student's personal information, e.g. statistical purposes, surveys, further study opportunities, alumni information and newsletters related to NTM events.

In acknowledging and accepting the Terms and Conditions of Enrolment/ Registration, the individual is taken to have implied consent to using or disclosing personal information for the listed purposes.

The NTM website records each visit by a site user ("user") and logs the following information for statistical purposes - the user's IP address, the date and time of the visit to the site, the pages accessed and documents downloaded, the previous website visited and the type of browser used. This information is analysed at each month's end to determine the site's usage statistics. No attempt is made to identify individual users or their browsing activities.

NTM also records the names, phone numbers and email addresses of people who make general enquiries about NTM courses, registration, or course fees via email or phoning NTM. This information enables NTM to respond appropriately to the enquirer and is securely stored by NTM.

NTM uses Google Analytics to analyse its website. The analytics platform gathers information about website use through cookies, which collect anonymous data. The information gathered about the NTM website is used to create reports about its use.

Under NTM's Terms and Conditions of Enrolment, enrolling students acknowledge and accept that NTM may use a person's personal contact information (or disclose this information to a Third Party to act on NTM's behalf) seeking participation in NTM, Governmental or National Centre for Vocational Education Research (NCVER) student surveys, or in relation to further study opportunities, alumni information and/or newsletters related to NTM events, unless the enrolling student withdraws such agreement and acceptance. Per our state and federal reporting guidelines, your enrollment and course information will be disclosed to NCVER so that your unique student identifier (USI) can be updated.

If NTM uses personal information, it will take reasonable steps to ensure that, having regard to the purpose for which the information is being used, it is accurate, complete, and up to date.

## 5.3 Storage, security and retention

NTM will securely store all personal information it holds, whether in hard copy record or within an electronic information store eg a system or database, to mitigate against loss, misuse or unauthorised access or disclosure.

Users of the NTM website should note that there are inherent risks associated with transmitting information via the Internet. Every user should assess the potential risks to the security of their personal information when deciding whether to use this site. For those users who do not wish to use the Internet, there are alternative ways to obtain information from and transact business with NTM, we can post you hard copies of forms for example.

NTM will take reasonable steps to ensure that personal information in its possession or control is securely stored and not misused. NTM takes a risk-based approach to determine appropriate security levels. It should be noted that the NTM website contains links to many other websites because they contain content related to the New South Wales community, business, or government. When a user clicks on a link to another website, they leave this site, and this privacy and security statement does not apply to those websites.

The content of the NTM's Privacy Statement may be updated from time to time, so users are encouraged to regularly check the Privacy Statement and carefully read the information provided.

## 5.4 Your Rights

Under the IPPs, a person for whom NTM holds personal information can request that it be accessed, updated, or, if appropriate, corrected.

## 6 Definitions

In this policy, the key terms are:

Term	Meaning
<b>AVETMISS</b>	AVETMISS stands for the Australian Vocational Education and Training Management Information Statistical Standard. It is a national data standard that ensures the consistency and accuracy of vocational education and training (VET) information. NTM must disclose this information to state and federal government agencies.
<b>Health Information</b>	For the purpose of this Policy refers to health information defined in the Health Records and Information Privacy Act 2002 (or as amended in the Health Records and Information Privacy Act 2002 from time to time
<b>Information Protection Principle (IPP)</b>	means the principles set out in Part 2 Division 1 of the Privacy and Personal Information Protection Act 1998 (NSW).
<b>NCVER</b>	The National Centre for Vocational Education Research is responsible for collating your enrolment and course information. All the your enrolment and course detail will be sent to NCVER.
<b>personal information</b>	has the same meaning as in the Privacy and Personal Information Protection Act 1998 (NSW), that is: "... information or an opinion (including information or an opinion forming part of a database and whether or not

	<p>recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.”</p> <p>Personal information includes such things as an individual's fingerprints, retina prints, body samples or genetic characteristics." (section 4 PPIPA)</p>
<b>USI</b>	<p>The Unique Student Identifier is a federal requirement. The scheme establishes a framework for the introduction of a student identifier for individuals undertaking nationally recognised vocational education and training from 1 January 2015. The scheme provides for how the student identifier may be assigned, collected, used, and disclosed. NTM must disclose your personal information to NCVET to update student USI records.</p>
<b>workers</b>	<p>All people employed by NTM, including continuing, permanent, fixed term, casual or traineeship basis</p>

## 7 Related Documents

This policy is to be read in conjunction with:

Student Privacy Statement  
 Current Version of the Learner Handbook  
 Complaints Policy  
 Complaints and Feedback Form  
 Enrolment Form  
 Smart and Skilled Questionnaire  
 Course Feedback Survey  
 Current Enrolment Form

## 8 Contact

Requests for personal information to be accessed, updated or corrected or complaints about the manner in which NTM has dealt with an individual's personal information should be directed to the NTM Privacy Officer via [admin@ntm.edu.au](mailto:admin@ntm.edu.au)

## 9 Document Information and Review

This policy document will be reviewed every three years.

Review No: PRIP01/2023

Next review date: 01.02.2026

Approval and version control history

Version	Effective	Approved by	Amendment / Reason
1.0	01.02.2017	Jane Lees – CEO	Development of policy with working group
2.0	30.01.2020	David Lipták – Director of Learning	Addition of website and Google analytics, changes to website to secure SSL (Secure Sockets Layer)
3.0	04.02.2023	Jane Lees – CEO	Updates to Privacy Statement and inclusion of Smart and Skilled Funding requirements

**End of Policy**