

Privacy Policy & Procedure

1. Policy

- 1.1 Orphic Education respects the privacy of all clients, staff and partners and is committed to protecting personal information provided.
- 1.2 This policy and procedure outlines how Orphic Education handles personal information including;
 - collection and safeguarding of personal information
 - use and disclosure of personal information,
 - client rights to access their personal information.
- 1.3 Orphic Education complies with both the National Privacy Principles and the Information Privacy Principles contained in the Commonwealth Privacy Amendment Act (2000) and the Victorian Information Privacy Act (2000).
- 1.4 This policy is implemented in compliance with the requirements of the Standards of Registered Training Organisations (RTOs) 2015.

Procedure

2. Collection of Personal Information

- 2.1 For many services provided, Orphic Education is required to collect personal information including the client's name, address, contact details and information specific to the service being delivered.
- 2.2 Collection is by lawful and fair means and is not unreasonably intrusive.
- 2.3 When collecting personal and sensitive information, Orphic Education ensures that clients are made aware of:
 - Orphic Education identity and how to contact us
 - their right to access their personal information
 - the purpose for collection
 - the organisation/s we disclose their personal information to
 - any law that requires the particular information to be collected
 - the consequences, if any, for the client if they do not provide the information required
- 2.4 Orphic Education makes every effort to collect personal information directly from the individual client. Where this is not possible, such as when a client is referred by a third party or when taking group enrolments, Orphic Education contacts each individual client to ensure they are aware of the points listed above.
- 2.5 Orphic Education collects sensitive information only when the client has given written consent.

3. Safeguarding Personal Information

- 3.1 Orphic Education ensures information provided remains private and protected from misuse, loss, unauthorised access, modification or disclosure. Security measures in place include;
 - individual password access to systems and databases
 - secure filing cabinets
 - secure storage and office facilities
- 3.2 Access to information is restricted to the relevant authorised staff.

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- 3.3 Information deemed inaccurate, irrelevant or out of date is destroyed in a way that renders it unusable, i.e. shredded.

4. Data Quality

- 4.1 Orphic Education will take reasonable steps to ensure that the personal information it collects uses or discloses is accurate, complete and up to date.

5. Access and Correction

- 5.1 Orphic Education will provide an individual with access to personal information it holds on that person upon request (at no cost). Client will be asked to provide evidence of identity e.g. drivers license or bank card. Where an individual can show that information held about them is not accurate, current or complete, Orphic Education will take reasonable steps to correct that information.

6. Identifiers

- 6.1 Orphic Education will only assign unique identifiers to individuals where it is necessary or directed by legislation in order to carry out one or more of its functions or activities.
- 6.2 Orphic Education will not make this unique identifier available to others and will not adopt, as its own, a unique identifier that has been assigned by another agency (unless required by the Standards of Registered Training Organisations (RTOs) 2015 or by law).

Documents to be employed in conjunction with this policy and procedure

- Client and staff files and relevant documentation
- Academic records
- Enrolment forms
- SMS
- Commonwealth Privacy Amendment Act (2000)
- Victorian Information Privacy Act (2000)

Revision history

Creation/ Revision Date	Comment	Created/ Revised by
06/12/19	Policy and procedure created	CEO