

<b>AUDIENCE</b>	<b>INTERNAL</b> <input checked="" type="checkbox"/>	<b>EXTERNAL</b> <input checked="" type="checkbox"/>
<b>POLICY ID</b>	EDN-038-I-POL Privacy Policy and Procedure	
<b>RESPONSIBLE OFFICER</b>	Manager International Education	
<b>CONTACT OFFICER</b>	International Compliance and Quality Coordinator	
<b>ENDORSED BY</b>	Continuous Improvement Committee	
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## 1. Introduction

### 1.1 Modification History

Version	Comments
N/A	New Policy for MEGT Education
2	Updated footer to include updated CRICOS code
3	Removal of reference to student support providers in the Philippines and addition of training partners in section 5.3.
4	Alignment to the Standards for Registered Training Organisations (RTOs) 2015
5	Updated links to the new PDF library
6	Deferred review date until second half of 2016
7	eLearning Manager title removed
8 International Version 1.0	Referenced Student Identifiers Act 2014 in Legislative Context Updated Mangement titles

### 1.2 Purpose

MEGT Education is committed to privacy protection and compliance with applicable privacy laws and standards, and will manage personal information in an open and transparent way. MEGT Education will fulfil its obligations under the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) by complying with the Australian Privacy Principles (APPs) [\[LINK\]](#). These 13 principles detail how organisations such as MEGT should collect, update, use, keep secure or where necessary disclose and give access to personal information, as well as how complaints should be handled and how, in some circumstances, anonymity can be maintained. This policy aims to clarify how MEGT Education will adhere to the APPs and outlines the types and means by which personal information is collected by MEGT Education. This policy and procedure is to be read in conjunction with MEGT (Australia) Ltd's Company wide Privacy Policy available at <http://megtinstitute.edu.au/privacy-policy/> .

## 2. Scope

This policy applies to:

- MEGT Education's potential, current and past students and employers.
- MEGT Education's Education Agents.
- MEGT Education's Student Recruitment Partners
- MEGT Education's Business and Training Partners
- MEGT Education Staff.

## 3. Legislative Context

This policy satisfies the requirements of the Australian Privacy Act 1988 (Privacy Act), the Australian Privacy Principles (APPs) which are contained in Schedule 1 of the Privacy Act, the Student Identifiers Act 2014 and the Standards for Registered Training Organisations (RTOs) 2015.

## 4. Definitions

**APPs:** Australian Privacy Principles

**ASQA:** The Australian Skills Quality Authority, the National VET Regulator

**AVETMISS:** Australian Vocational Education and Training Management Information Statistical Standard

**CoE:** Confirmation of Enrolment

**CRICOS:** Commonwealth Register of Institutions and Courses for Overseas Students

**EOI:** Expression of Interest

**ESOS:** Education Services for Overseas Students

**MEGT Education:** MEGT (Australia) Ltd, trading as MEGT Institute. ABILITY Education Pty Ltd, trading as ABILITY English

**NCVER:** National Centre for Vocational Education Research

**PRISMS:** Provider Registration and International Student Management System

**Secure:** Secure in this context refers to having mechanisms in place so that personal documentation is stored in secure locations and only able to be accessed by authorised personnel. This may include being locked filing cabinets, offices or archive rooms for hard copy files or protected by login access and firewalls for electronic files.

**SMS:** AVETMISS compliant Student Management System

**SRTOs:** Standards for Registered Training Organisations 2015 – implemented by ASQA

**USI:** Unique Student Identifier

**VP:** Vocational Placement

## 5. Policy Statement

Information collected and held by MEGT Education will be managed in accordance with the Australian Privacy Principles (APPs). MEGT Education will at all times ensure that information is collected about an individual from the individual themselves and the collection and storage of their personal information will be secure and not distributed without that individual's explicit written consent.

### 5.1 Personal Information Collected

Information collected and held by MEGT Education could include but is not limited to:

- Name
- Date of Birth
- Gender
- Current and previous overseas and Australian address.
- Telephone number/s

- Email addresses
- Driver Licence Number
- Company Name
- Tax File Number (TFN)
- Passport Number
- Visa number and class
- Bank Account Details
- Birth Certificates
- Unique Student Identifier
- Diversity Status
- Relevant Sensitive Information (e.g. health and/or disability)
- Financial and Business Details

## 5.2 Where Personal Information is Collected

MEGT Education collects personal information in a number of ways which includes, but is not limited to:

- Directly from applicants when they express interest or apply for enrolment with MEGT Institute and/or ABILITY English into an education or training course on an Expression of Interest/Contact us or Enrolment Form
- Directly from Education Agents acting on behalf of students where students have expressively authorised the Education Agent to act on their behalf
- Directly from host work placement organisations when agreeing to and signing Memorandums of Understanding, tri-partite agreements and other documentation required for legal/compliance
- Directly from recruitment partners as part of our partnership arrangements to source and recruit students into an education or training course
- Through marketing activities, student expos, email enquiries and similar mechanisms where the interested parties provide personal information in order to find out about training opportunities.

MEGT Education will in all circumstances ensure that personal information is collected in a transparent manner and not used outside its intended purpose without the explicit consent of the individual.

## 5.3 How Personal Information is Used

MEGT Education uses personal information collected from an individual or an authorised third party acting on their behalf to fulfil its obligations in delivering educational services:

- To record student information and progression of training and education courses in the Student Management System
- To apply for enrolled students Unique Student Identifier (USI) on their behalf, once written permission from the student has been attained.
- To access the Unique Student Identifier (USI) register to substantiate student claims of previous study for eligibility or skills recognition purposes, once a students written permission has been obtained
- To record student information and issue Confirmation of Enrolment (CoE) in the Provider Registration and International Student Management System (PRISMS)
- To maintain evidence of participation, progression and completion in individual student (hard copy and electronic format) files.
- To enable the reporting of AVETMISS data to NCVET and state authorities to meet contract obligations and requirements

- To enable contracted training partners to enrol our students on their SMS, record training results and issue Statements of Attainment, as required.
- Supplied to MEGT's contract trainers and contracted student support providers to enable them access to the information needed to adequately service each individual student's requirements, as needed.
- Allows for sending notifications to students such as semester timetables, invoices to students and employers for training services or training materials, further training opportunities, changes to the Privacy Principles; and the issuance of testamurs, statements of attainment and statements of results.
- Emergency contact details are for the purposes of contacting appropriate next of kin in the event of an unforeseen emergency.
- Supplied to support work supervisors/managers to manage student behavior and performance.
- The Marketing and Business Development arms of MEGT, may from time to time, use student and employer contact details to inform them about potential training services and opportunities.
- Supplied to host vocational placement providers, so they have sufficient evidence of the students taking part in workplacement. This would include the provision of a student's Working With Children check (or state equivalent), name and contact details, including emergency contact details.
- Supplied to training partners MEGT Institute has a formal written agreement with (such as St John Ambulance for the delivery of first aid), via a Memorandum of Understanding, and that have policies and procedures in place that adhere to the Australian Privacy Principles.

## 6. Procedures

MEGT (Australia) Ltd, trading as MEGT Institute and Ability Education Pty Ltd, trading as Ability English, will only use student's personal information and the personal information of any third parties, including transborder data flow, in accordance with MEGT (Australia) Ltd's Privacy Policy made available on the website.

Once received, private information from each student's enrolment form is entered into the Student Management System (SMS) by the administration team and an individual file for each student is created, in which a copy of the enrolment form is retained. Any form not signed by the applicant (or parent/guardian if under 18 years of age) is not processed.

Information from the SMS is automatically uploaded to the various State and Commonwealth Government funding bodies and ultimately to NCVET, and other statutory authorities, as required by the SRTOs.

MEGT Education takes all reasonable steps to keep personal information secure at all times and ensures that the personal information it collects, uses and where specified above, discloses to others is accurate, complete, and up to date. If an individual establishes that the information held about them is not accurate, complete, up to date, relevant or misleading; once notified of this, MEGT will take all reasonable steps to correct the information.

In relation to the Student Identifier Scheme, MEGT Institute will:

- verify with the Registrar, a Student Identifier provided by an individual before using that Student Identifier for any purpose
- ensure that it will not issue AQF certification documentation to an individual without being in receipt of a verified Student Identifier for that individual, unless an exemption applies under the Student Identifiers Act 2014
- ensure that where an exemption applies, it will inform the student prior to either the completion of the enrolment or commencement of training and assessment, whichever occurs first, that the results of the training will not be accessible through the

Commonwealth and will not appear on any authenticated VET transcript prepared by the Registrar,

- ensure the security of Student Identifiers and all related documentation under its control, including information stored in its student management systems.

Enrolled students have the right to access any personal information held by MEGT Education about them, subject to some restrictions listed in Federal Government legislation.

MEGT Institute will not disclose any personal information without first establishing the identity of the person requesting the information. If access to personal information held by MEGT Institute is required, a written request specifying the information sought may be made to an individual's usual contact at MEGT Institute (Trainer, Education Manager, Manager International Education,) or the Privacy Officer / National Senior Executive Human Resources. Adequate identification from the student or written authority from an individual must be supplied to MEGT before any personal information will be provided.

Any complaint by an individual regarding MEGT Institute's management or handling of personal information should be directed to MEGT's Privacy Officer. To enable a complaint to be properly understood and acted upon it is requested that it be made in writing, specifying the personal information involved and the contact or process at MEGT Institute that is the subject of the complaint. All complaints will be acknowledged within five (5) working days of receipt.

Contact details of the person dealing with the complaint and the Privacy Officer will also be advised to the individual making the complaint at this time. Complaints will be responded to within fifteen (15) working days. If this is not possible the individual will be advised as to when MEGT expects to be able to respond. If MEGT's response does not resolve the complaint MEGT and the individual will, in good faith, promptly agree to a process and time frame for dealing with the complaint.

## **7. Related Policies & Procedures**

HR1011 Privacy Policy (MEGT (Australia) Ltd)

EDN-026-I-POL Archiving, Retention and Retrieval Guidelines for Student Record Policy and Procedure

EDN-008-I-POL Complaints and Appeals Policy and Procedure

## **8. Implementation**

EDN-038-I-POL Institute Privacy Policy is made available on the MEGT Institute and ABILITY English websites externally and MEGT Intranet internally.

## **9. Responsibilities**

The Manager International Education and Compliance Team will review this policy and procedure annually, or in case of legislative changes requiring amendments the responsible officer will amend accordingly.

## **10. Attachments**

N/A

## **11. Process Map**

N/A