



Purpose

PEER VEET is committed to maintaining the privacy and confidentiality of its employees, apprentice and student records. Our organisation complies with the Privacy Act 1988 including the 13 Australian Privacy principles (APPs) as outlined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Policy

PEER VEET manages personal information in an open and transparent way. PEER VEET ensures compliance with the APPs and provides suitable procedures for our employees to be able to deal with related enquiries and complaints that may be received.

Glossary

- PEER VEET – Plumbing, Electrical, Electronic and Refrigeration Vocational Education, Employment and Training Incorporated
- RTO – Registered Training Organisation
- GTO – Group Training Organisation
- ASQA – Australian Skills Quality Authority

Purposes for information collection, retention, use and disclosure

PEER VEET retains a record of personal information about individuals with whom we undertake any form of dealings with. PEER VEET must collect, hold, use and disclose information from our clients and stakeholders for a range of purposes, including but not limited to:

- Providing services to clients
- Managing employee and contractor terms
- Promoting products and services
- Conducting internal business functions
- Requirements of stakeholders and reporting measures.
- To be compliant with GTO National Standards
- To be compliant with Standards for Registering Training Organisations (RTOs) 2015 (S3.4, S3.6 (d), S6.3, S7.5, S8.5, S8.6)

As a Registered Training Organisation, regulated by the Australian Skills Quality Authority (ASQA), PEER VEET is required to collect, hold, use and disclose a wide range of personal and sensitive information on participants in nationally recognised training programs. This information requirement is outlined in the National Vocational Education and training Regulator Act 2011. As an RTO and GTO we must ensure we comply with the following:

- Standards for Group Training Organisations 2006
- Standards for NVR Registered Training organisation 2015
- Data Provisions Requirements 2012
- Student Identifiers Act 2014

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It is noted that PEER VEET is also bound by various State Government Acts requiring similar information collection, use and disclosure. It is also noted that PEER VEET delivers services through a range of Commonwealth and State Government funding contract agreements, which also include various information collection and disclosure requirements.

Individuals are advised that due to these legal responsibilities, PEER VEET discloses information held on individuals for valid purposes to a range of entities, including;

- Government (Commonwealth, State or Local)
- Apprenticeship Network providers, Employers and their representatives
- Job Active Providers
- Schools
- Guardians
- Service providers such as credit agencies and background check providers.

The kind of information collected and held:

The following types of personal information are generally collected, depending on the need for service delivery:

- Contact details;
- Employment details;
- Educational background;
- Demographic Information;
- Course progress and achievement information; and
- Financial information.

The following types of sensitive information may also be collected and held:

- Resume and employer reference
- Identity details;
- Employee details & HR information;
- Complaint or issue information;
- Disability status & other individual needs;
- Indigenous status; and
- Background checks (such as National Criminal Checks or Working with Children checks).

Where PEER VEET collects personal information for a more vulnerable segment of the community (such as children), additional practices and procedures are also followed.

Please refer to ***PEER VEET's CORP-015 Child Safe Policy*** for further information.

Sensitive Information

Where it is necessary to do so, we may collect personal information about you that is sensitive. Sensitive information includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association member, sexual preferences, criminal record, and health information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or directly related secondary purposes, unless agreed otherwise, or where certain other limited circumstances apply (e.g. where required by law).



Anonymity and Pseudonymity

PEER VEET will allow for clients to use a pseudonym and or the option of dealing with PEER VEET anonymously. On the occasion where it is impracticable for PEER VEET to deal with an individual who has not identified themselves, identification will be required. This includes the commencement of a service. PEER VEET is authorised by law and it is a requirement of our regulatory body (ASQA) to provide our service to an individual who has accurately identified themselves

Disclosure of information to third parties

PEER VEET will outline the circumstances and purpose in which PEER may use and or disclose the personal information that it holds on an individual.

PEER VEET will identify exceptions where it is reasonably necessary to use and or disclose personal information on an individual. These exceptions include:

- To assist in locating a missing person
- To establish , exercise or defend a legal or equitable claim
- For the purpose of a confidential alternative dispute resolution

PEER VEET will only disclose information to an overseas recipient, once steps to ensure compliance with the PEER VEET privacy policy, have been met.

How personal information is collected

PEER VEET's usual approach to collecting personal information is to collect any required information directly from the individuals concerned. This may include the use of forms (such as enrolment forms, employment applications, HR information) and the use of web based systems (such as online enquiry and application forms, online learning or internal operating systems).

PEER VEET does receive solicited and unsolicited information from third party sources in undertaking service delivery activities. This may include information from such entities as:

- Governments (Commonwealth, State or Local);
- Apprenticeship Network Providers;
- Employers (and their representatives), Job Active Providers, Schools, Guardians; and
- Service providers such as credit agencies and background check providers.

PEER VEET does not receive personal information from an overseas third party

Collection from third parties

Where PEER VEET collects personal information from another organisation, we:

1. Confirm whether the other organisation has provided the relevant notice above to the individual; or
2. Whether the individual was otherwise aware of these details at the time of collection; and
3. If this has not occurred, we will undertake to provide this notice to ensure the individual is fully informed of the information collection.



How personal information is held

PEER VEET's usual approach to holding personal information includes safe storage and security measures at all times. Information on collection is:

- Converted to electronic means as soon as practical;
- Stored in secure, password protected systems, such as financial system, apprentice management system, learning management system and student management system; and
- Monitored for appropriate authorised use at all times.

Only authorised personnel are provided with login information to each system, with system access limited to only those relevant to their specific role.

Retention and Destruction of Information

PEER VEET's Archive and Record Management Policy outlines our process for management, access and destruction of records. PEER VEET maintains a Retention and Disposal Schedule documenting the periods for which personal information records are kept.

In the event of our organisation ceasing to operate the required personal information on record for individuals undertaking nationally recognised training with PEER VEET would be transferred to the Australian Skills Quality Authority, as required by law.

Please refer to PEER VEET ***CORP - 004 Archive & Records Management***

Accessing and seeking correction of personal information

PEER VEET confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to make contact with:

Michael Boyce
PEER VEET Privacy Officer
08 8348 1200
mikeb@peer.com.au

A number of third parties, other than the individual, may request access to an individual's personal information. Such third parties may include employers, parents or guardians, schools, Australian Apprenticeships Providers, Governments (Commonwealth, State or Local) and various other stakeholders.

In all cases where access is requested, PEER VEET will ensure that:

- Parties requesting access to personal information are identified and vetted;
- Where legally possible, the individual to whom the information relates will be contacted to confirm consent in writing (if consent not previously provided for the matter); and
- Only appropriately authorised parties, for valid purposes, will be provided access to the information.

Please refer to the PEER VEET ***CORP – 050 Request for Records access and update procedure***



Privacy and Complaints Procedure

Complaints in regards to breaches to the privacy of personal information will be directed to PEER VEET's Privacy Officer. PEER VEET have delegated the responsibility of this role to the CEO. If an individual feels that PEER VEET have breached its obligations in the handling, use or disclosure of their personal information, they may raise a complaint. We encourage individuals to discuss the situation with their PEER VEET representative in the first instance, before making a complaint.

The complaints process is as follows:

1. The individual should make the complaint including as much detail about the issue as possible in writing to PEER VEET:

Michael Boyce
PEER VEET Privacy Officer
mikeb@peer.com.au
PO Box 2160 Port Adelaide BC
Port Adelaide SA 5015

2. PEER VEET's Privacy Officer will investigate the circumstances included in the complaint and respond to the individual as soon as possible (and within **30 calendar days**) regarding the findings and actions following this investigation.
3. After considering this response, if the individual is still not satisfied they may escalate their complaint directly to the Information Commissioner for investigation:

Office of the Australian Information Commissioner
www.oaic.gov.au
Phone: 1300 363 992

When investigating a complaint, the OAIC will initially attempt to conciliate the complaint, before considering the exercise of other complaint resolution powers.

Making our APP Privacy Policy available

PEER VEET provides our APP Privacy Policy available free of charge, with all information being publicly available from the Privacy link on our website and for distribution on request, including any particular format requested by the individual as is reasonably practical.

Review and Update of this APP Privacy Policy

PEER VEET reviews this APP Privacy Policy:

- On an ongoing basis, as suggestions or issues are raised and addressed, or as government required changes are identified;
- Through our internal audit processes on at least an annual basis;
- As a part of any external audit of our operations that may be conducted by various government agencies as a part of our registration as an RTO and GTO or in normal business activities; and



- As a component of each and every complaint investigation process where the complaint is related to a privacy matter.

Where this policy is updated, changes to the policy are widely communicated to stakeholders through internal personnel communications, meetings, training and documentation, and externally through publishing of the policy on PEER VEET's website and other relevant documentation (such as our Student Handbook) for clients.

PEER VEET's Compliance with Australian Privacy Principles Outlined:

APP 1. Open and transparent management of personal information.

PEER VEET will use and manage personal information in a transparent and open way. This includes and up to date Privacy policy and procedures that is easily accessible to anyone

APP 2. Anonymity and pseudonymity

PEER VEET will allow for clients to use a pseudonym and or the option of dealing with PEER anonymously. On the occasion where by it is impracticable for PEER VEET to deal with an individual who has not identified themselves, identification will be required. This includes the commencement of the service. PEER VEET is authorised by law and it is a requirement of regulatory body (ASQA) to provide our service to an individual that has accurately identified themselves

APP 3. Collection of solicited personal information

PEER VEET will collect personal information and may collect sensitive information. PEER VEET will only solicit information on an individual when it is reasonably necessary for one or more of PEER VEET's functions or business activities.

PEER VEET will not collect information from an individual if it is unreasonable or impracticable to do so

APP 4. Dealing with unsolicited information

In the occurrence that PEER receives unsolicited information, in relation to personal information, PEER will seek to determine if the information collected has been permitted. PEER will destroy or de-identify that information as soon as practical and only if it is lawful and reasonable to do so

APP 5. Notification of the collection of personal information

PEER VEET will notify the individual about the collection, use, access, correction and complaints procedures in regards to the privacy of their personal information. Notification of these points can be found in the following documents:

- PEER VEET Privacy policy (this document)
- PEER VEET CORP – 050 Request for records Access and update procedure
- PEER VEET CORP-015 Child Safe
- PEER VEET CORP-016 Complaint and grievance policy and procedure



APP 6. Use and disclosure of personal information

PEER VEET will outline the circumstances and purpose in which PEER VEET may use and or disclose the personal information that it holds on an individual.

PEER VEET will identify exceptions where it is reasonably necessary to use and or disclose personal information on an individual. These exceptions include:

- To assist in locating a missing person
- To establish , exercise or defend a legal or equitable claim
- For the purpose of a confidential alternative dispute resolution

APP 7. Direct marketing

PEER VEET will gain consent from an individual, if their personal information will be used for internal direct marketing purposes, unless it is reasonably expected to do so

APP 8. Cross-border disclosure

PEER VEET will only disclose information to an overseas recipient, once steps to ensure compliance with the PEER VEET privacy policy, have been met

APP 9. Adoption, use or disclosure of government related identifiers

PEER VEET will not use or disclose any government identifiers in relation to an individual's personal information

APP 10. Quality personal information

PEER VEET will make reasonable steps to ensure that the personal information that is collected from any individual is accurate, up to date and complete

APP 11. Security of personal information

PEER VEET will take reasonable steps to ensure solicited, personal information is kept in a secure location, preventing the miss-use and loss of the information. This is also in addition to the unauthorised access, modification and disclosure of the personal information. PEER VEET will take reasonable steps to destroy or de-identify any unsolicited information or if the information no longer has a use

APP 12. Access to personal information

PEER will allow and respond to requests of access to personal information within a reasonable timeframe and in a format requested by the individual. Access to records of personal information is outlined in the "***PEER VEET CORP – 050 Request for records Access and update procedure***" and all requests must be done in writing by the individual using the ***PEER VEET CORP-820 Records Access or Update request form***

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APP 13. Correction of personal information

PEER VEET will take reasonable steps to ensure that the personal information held on an individual is accurate, up to date, complete and relevant to the functions of PEER VEET. An individual can at any stage ask for their information to be corrected or made up to date with the individual's current circumstances.

Correction of personal information is outlined in the "***PEER VEET CORP – 050 Request for records Access and update procedure***" and all requests are required to be in writing using the ***PEER VEET CORP-820 Records Access or Update request form***

DOCUMENT REVISION / AUTHORISATION HISTORY

Date	Description of Amendment	Prepared By	Authorised
9/11/11	Added information for releasing staff information	D.Cocks	M Boyce
10/09/15	Updated	V Heading	M Boyce