
PRIVACY POLICY AND NOTICE

At HBTA we take privacy seriously and are committed to protecting the personal information and digital identity of our students, employees, and other stakeholders. We are bound by the:

- Standards for RTOs, 2015,
- National Vocational Education and Training Regulator Act 2011,
- Privacy Act 1988 (Cth),
- the Student Identifiers Act 2014 (Cth) and the
- Australian Privacy Principles (APPs) contained within these.

This privacy policy sets out the information we collect, how we use that information, and how we protect it.

Information Collection

We collect personal information from our students and employees, including but not limited to:

- Names and signatures
- Personal contact details (such as email address, phone number, residential and postal addresses)
- Date of birth
- Tax file number
- Proof of identity and/or citizenship
- Kinship and cultural identity details
- Unique Student Identifier (USI)

HBTA may also collect or hold sensitive and identifying information, including

- Photographs used to confirm identity
- Health information provided by individuals, for example when seeking learning support
- Information about your racial identity or indigenous status for example when making a enrolment application
- Allegations of criminal conduct and police and criminal history information, for example when vetting employees, board members, scholarship applicants or contractors.

We also collect personal information from other sources, such as government agencies, in accordance with the legislation and regulations.

Information Use

We use personal information to:

- Provide training and support services to our students
- Maintain student records and track student progress
- Manage recruitment of trainers and assessors
- Enter into an agreement to provide training services
- Fulfill our obligations under the law and for the purposes for which the information was collected
- Comply with funding body requirements
- Contact students regarding training and support services
- Conduct research and statistical analysis
- Marketing our business, which involves the production and distribution of promotional material through such media as:
 - external publications, such as newspapers and magazines;
 - Internal and external publications, such as Annual Reports, posters, brochures, booklets and displays;
 - television and radio segments or advertisements; and
 - intranet and Internet sites, official social media platforms, such as YouTube, Twitter and Facebook.

We do not use personal information for any other purpose unless we have obtained the person's consent, or we are required or authorized by law to do so.

How we collect personal information

HBTA collects personal information only by lawful and fair means. It is our usual practice to collect personal information directly from you or your authorised representative when you deal with us by telephone, letter, email, face-to-face or online. In particular, HBTA collects your personal information when you use one of the websites maintained by HBTA, including <http://www.hbta.edu.au/> We may also collect cookies, IP addresses and cached information from online forms.

We may collect personal information from another source including a third party where you consent, for example for enrolments under traineeships or via an organisation training request.

How we store and protect personal information

Personal information held by HBTA is managed securely through our recordkeeping system. We take physical and electronic security measures to protect your personal information from misuse, interference and loss; and from unauthorised access, modification or disclosure.

HBTA's electronic records management system, network drives and virtual server environment are hosted by Dropbox within Australia. We secure electronic information using firewalls, secure databases, secure online systems, password protection for electronic files, and multi-factor authentication.

We restrict physical access to our offices and secure physical files using secure cabinets and containers.

Staff members across HBTA have access to personal information on a need to know basis only. Sensitive personal information stored in our databases can only be accessed by authorised users to work on particular enquiries, complaints, applications, and/or cases. These databases have an audit trail whenever personal information is included, amended, or deleted.

Guidelines on ethical use

Personal information, photographs and videos taken by HBTA staff and affiliates should respect human dignity and ensure the rights, safety and well-being of the person or people identified. This means:

- Complying with local traditions or restrictions in taking or reproducing images of people, objects or places
- Understanding national laws related to photography, filming and privacy rights
- Gaining appropriate verbal or written informed consent before taking photographs or videos
- Respecting a person's right to refuse to be photographed or video. If you sense any reluctance or confusion, refrain from taking the photo or video
- Not causing harm. Individuals or groups may be put at risk of reprisal, violence or rejection in their communities as a result of exposing their identity or personal story through the publication of their photograph or broadcast of any video
- Not misrepresenting the individual, situation, context and location of the photograph or video
- Absolutely no payments or any other form of compensation being provided to subjects in exchange for their photograph or video to be taken or for their consent or signed release for publication or broadcast

Information Sharing

We may share personal information with others if:

- you have consented to use or disclosure for a secondary purpose
- you would reasonably expect the information to be used or disclosed for a secondary purpose which is related to the primary purpose, or in the case of sensitive information, where the secondary purpose is directly related to the primary purpose
- requested by Government agencies and funding bodies
- our employees and contractors require this for the purpose of providing contextualised training and support services
- other third parties require this by law or with the person's consent

We do not share your personal information with employers or other third parties without your given consent. The declaration section of enrolment forms may record this consent or you may give this in writing during pre-enrolment interviews.

We do not sell or share personal information with any other third party for their own marketing purposes.

Information Security

We take reasonable steps to protect personal information from unauthorized access, use, disclosure, and destruction. We maintain physical, electronic, and procedural safeguards to protect personal information, and regularly review and update these measures as necessary.

Privacy Statement for enrolments

The HBTA enrolment form must include wording as provided in the DEWR *VET Provider Collection Specifications (Enrolment Privacy Notice)*

Access to Personal Information

We provide access to personal information in accordance with the APPs, subject to some exceptions as provided by law. We take steps to verify the identity of the person making the request before providing access to personal information.

Complaints

If you have any concerns or complaints about our handling of personal information, please contact us in writing at ceo@hbta.edu.au. We will provide a written response to your complaint. If a breach has been identified as a result of your complaint, we will advise you of the findings. We aim to provide you with a response within 30 days.

Changes to this Privacy Policy

We may update this privacy policy from time to time, and any changes will be posted on our intranet and HBTA website. By continuing to use our services, you accept the terms of this privacy policy and any updates.

If you have any questions about our privacy policy, please contact us at admin@hbta.edu.au.