	Sarina Russo Institute Privacy Policy
	Version: 4.2
Department: Quality Assurance	Last Review Date: 18 October 2022

Sarina Russo Institute (SRI) is committed to protecting the privacy of your *personal information* and/or *sensitive information* as defined under the *Privacy Act 1988* (“**Your Information**”). This policy sets out the way we handle Your Information including the collection, use, disclosure and storage of Your Information, as well as your right to access Your Information. All information has been collected by SRI in accordance with the Australian Privacy Principles and will only be disclosed in accordance with these Principles.

This policy generally applies to SRI’s databases and files and does not cover any State, Territory or Commonwealth Government-owned database or files. You are advised to contact the relevant government agency for a copy of their privacy policy. In relation to any programmes operated with funding from the Queensland Government, Your Information will be treated in accordance with the Information Privacy Act 2009 (Qld) and the Data Provision Requirements 2012 as the case may be.

SRI is required by law (under the National Vocational Education and Training Regulator Act 2011 (Cth) (NVETR Act)) to disclose the personal information we collect about you to the National VET Data Collection kept by the National Centre for Vocational Education Research Ltd (NCVER). The NCVER is responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector. We are also authorised by law (under the NVETR Act) to disclose your personal information to the relevant state or territory training authority.

If we change this Privacy Policy, we will post the changes on our website so you may be aware of the information we collect and how we use it. Accordingly, you are reminded to check our website for further details.

Your Information

We only collect Your Information when it is reasonably necessary for our functions and activities in providing education and associated training services. We may collect information about you in a number of circumstances and the information we collect will depend on the services we are providing to you; for example whether we are assisting you or your staff with accredited and non-accredited training and education, English language programmes, mentoring, skills assessment, job placement and employment services.

In order to provide you education and associated training services, we may need to collect Your Information such as name, postal address, email address, telephone number, information regarding your job/business, employment and education history, qualifications, English proficiency, career details or other information generally contained in a resume and other information reasonably necessary to conduct these services. In some circumstances, with your permission, it may include health information and details of your nationality, visa status and passport details.


Collection

Where practicable, SRI will endeavour to collect Your Information directly from you. In order to provide you with education and associated training services we will need to collect information from you such as:

- Your name
- Your contact details
- Your Unique Student Identifier (USI)
- Your qualifications and education history
- Your previous employment history
- Identification information
- Health Information
- Details of your nationality, visa status and passport details
- Documents reasonably required to administer the VET Student Loans program
- If applicable, other relevant details from your Employment Service Provider
- Relevant information to assess your work capacity and work ability to obtain and sustain employment or work experience placements relevant to your field of study
- Guardian and welfare information in some circumstances for students under 18 years of age.

As a service provider regulated by government authorities, we may also collect Your Information from Commonwealth Government Departments and agencies including but not limited to:

- The Department of Employment, Small Business and Training (Qld) and relevant equivalent in other states and territories

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- The Department of Home Affairs (Commonwealth)
- Department of Foreign Affairs and Trade (Commonwealth)
- The Department of Employment and Workplace Relations (Commonwealth)
- Your Commonwealth Government contracted Employment Service Provider
- Your insurer, including, for international students, your overseas health insurance cover provider.

To provide you with education and associated training services we may also collect Your Information from other third parties such as:

- Anyone nominated by you

At, or as soon as practicable after, SRI collects Your Information we will take reasonable steps to ensure you are made aware of:

- SRI's identity and how you can contact us;
- Your rights with regard to accessing Your Information;
- The purpose for which Your Information was collected;
- To whom we usually disclose Your Information;
- Our requirement to collect particular or further information to comply with law or our Government contractual obligations; and
- The main consequences, if any, for you if you do not provide all or part of the information we require.

If we receive unsolicited information we will determine if we could have collected this information had we solicited it ourselves. If we determined we could not, and the information is not in a Commonwealth record, we will destroy or de-identify the information.

SRI will only collect Your Information by lawful and fair means.


Use and Disclosure

We will use our best efforts to ensure Your Information remains private and is used only for the purposes you agree to.

SRI will not reveal, disclose, sell, distribute, rent, licence, share or pass Your Information to a third party, other than those that we have a binding agreement with ensuring that the third party affords Your Information similar levels of protection as we do.

In order to provide you with education and associated training services, we may need to disclose Your Information to third parties such as:

- The Department of Employment and Workplace Relations including under the VET Student Loans program (Commonwealth)
- The Department of Home Affairs (Commonwealth)
- Department of Foreign Affairs and Trade (Commonwealth)
- The Australian Skills Quality Authority (ASQA), the Tertiary Education Quality and Standards Agency (TEQSA) and other regulatory bodies and authorised agencies (including for monitoring and evaluation purposes)
- The National Centre for Vocational Education Research (NCVER)
- The Department of Employment, Small Business and Training (Qld) and relevant equivalent in other states and territories (including for monitoring and evaluation purposes)
- Organisations conducting student surveys and researcher
- Other students where it is reasonably required to facilitate group projects or assessments
- Centrelink/Services Australia
- Other bodies who require registration of training e.g. the Department of Justice and Attorney-General or state occupational health and safety authorities
- Potential employers or Your employer
- Your Employment Service Provider
- Work Experience Providers
- Recruitment Agencies or Group Training Organisations
- Universities or other training providers
- Your insurer, including, for international students, your overseas health insurance cover provider.

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- Your agent or your sponsor
- Homestay Providers
- Tuition Protection Services (TPS) which operates under the ESOS Act 2000
- Australian Students Tuition Assurance Scheme (ASTAS)

Further, we may use and disclose Your Information to provide you with education and associated training services specific to you at point of collection or for another purpose if:

- You would reasonably expect us to disclose it for that purpose;
- That purpose is directly related to the purpose specified to you at the time of collection.
- SRI reasonably believes the use is necessary to lessen or prevent a serious threat to an individual's life, health or safety or to public health or safety and it is unreasonable or impractical to obtain your consent;
- SRI has reason to suspect that unlawful activity has been, or is being engaged in, and uses the information as part of its investigation, or in reporting its concerns to the relevant authority;
- The use and disclosure is specifically authorised by law; or
- Any other exceptions provided in the *Privacy Act 1988*.

SRI does not disclose Your Information to unrelated entities for the purposes of direct marketing unrelated products or services.

Data Quality

SRI will take reasonable steps to ensure that Your Information is accurate, up-to-date, complete and relevant. You are encouraged to help us keep Your Information accurate, complete and up-to-date by contacting your consultant or this organisation and inform us of any changes to your details. You can contact us on privacy@sarinarusso.com.au

Data Security

At SRI we are committed to protecting the privacy of Your Information. A Student file will be opened at enrolment so your studies and results will be recorded on a regular basis until the completion of your course. The file will be archived in accordance with the National VET Regulator Standards.

We take reasonable steps to protect Your Information from misuse, loss, interference and from unauthorised access, modification or disclosure. We ensure this by having such security measures as:

- Individual password access to systems and databases
- Secure data storage

All staff confirm their acceptance of the Electronic Use and Security Policy.


We will also take reasonable steps to destroy or permanently de-identify Your Information if it is no longer required for any purpose unless it is contained in a Commonwealth record or required by law.

We will make every possible effort to keep the personal information current and accurate, however it is your responsibility to inform and update your personal information held in our records and systems.

Any change of Your personal details must be reported to us as soon as practicable with required evidences specified in the relevant forms.

Access and Correction

You will be provided the opportunity to access Your Information and correct that information if you determine it is incorrect. SRI will allow any person on whom records are maintained to have access to those records unless Government contractual requirements or legislation (e.g. Freedom of Information Act) requires or authorises the refusal of access. To obtain access to Your Information please make a request to your closest SRI office. Before giving access to information, SRI will require that you provide proof of identification and this along with details of your request will be recorded on your file.

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Identifiers

SRI will not adopt as its own identifier an identifier that has been assigned by a government agency. Where practicable SRI will not use or disclose an identifier assigned to an individual by a government agency.

Anonymity and Pseudonymity

Whenever it is lawful or practicable, you will have an option of not identifying yourself when dealing with SRI. Due to the nature of the services being provided to you this will be very limited cases.

Sensitive Information

SRI will not collect *sensitive information* revealing your racial or ethnical origin, political opinions, religious or philosophical beliefs, trade-union membership or details of health, disability or sexual activity or orientation unless:

- Your consent has been obtained and the information is reasonably necessary to provide you with training and related services; or
- The collection is required or authorised by law; or
- The collection is necessary to prevent or lessen a serious threat to the life, health or safety of any individual, or to public health or safety and it is unreasonable or impractical to obtain your consent; or
- SRI has reason to suspect that unlawful activity, or misconduct of a serious nature, relating to our functions/activities has been, or is being engaged in and we believe this collection is necessary for us to take action in relation to this matter; or
- Any other exceptions provided in the Privacy Act 1988.

Resolving Privacy Concerns

You are able to raise any concerns you may have regarding Your Information handling practices by detailing your concerns with the Legal Counsel or Privacy Co-ordinator at Sarina Russo Group Head Office through privacy@sarinarusso.com.au.

Storing and Transferring information about you abroad

If your Information is provided to us as part of our services to you under an Australian Government contract, your Information will not be housed in an offshore data management system or transferred outside of Australia.

Otherwise, your Information may be housed in an offshore data management system. We will endeavour to ensure a level of data protection at least as protective as that required in Australia and where possible we have contracted with our cloud storage providers to uphold these standards.

The Internet and Your Privacy

SRI uses the World Wide Web in order to assist you in providing education and associated training services.

SRI takes all reasonable steps to protect your security when using our website, but you should be aware that no transmission of information to and from a website is ever totally secure, particularly from malicious attack. Accordingly, transmission is at your own risk.

It is important to remember that if you are using a computer in a public place, such as a library or community centre, you must remember to log-off, otherwise others may be able to access Your Information.

Sarina Russo Group Head Office
 Sarina Russo River Centre
 Level 6
 100 Eagle Street
 BRISBANE QLD 4000

Ph: 07 3001 8010
 Fax: 07 3001 8088

www.sarinarusso.com.au