

Purpose

Dickens Assessment and Training Services, ABN 29 127 641 758, is a privately owned registered training organisation and is responsible for providing training and assessment within the Vocational Education and Training (VET). Dickens Assessment and Training Services complies with the Privacy Act 1988 (Cth) and manages personal information in accordance with the new Australian Privacy Principles outlined in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Dickens Assessment and Training Services complies with the Privacy Act 1988 (Commonwealth). This policy describes how Dickens Assessment and Training Services collects, manages, uses, discloses, protects, and disposes of personal information in accordance with the thirteen Australian Privacy Principles (APPs) outlined in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Definitions

Under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012 (s6(1)), personal and sensitive information is defined as follows:

- *Personal information*: information or an opinion about an identified individual, or an individual who is reasonably identifiable:
 - (a) whether the information or opinion is true or not; and
 - (b) whether the information or opinion is recorded in a material form or not.”
- *Sensitive information*:
 - (a) information or an opinion about an individual’s:
 - (i) racial or ethnic origin, or
 - (ii) political opinions, or
 - (iii) membership of a political association, or
 - (iv) religious beliefs or affiliations, or
 - (v) philosophical beliefs, or
 - (vi) membership of a professional or trade association, or
 - (vii) membership of a trade union, or
 - (viii) sexual preferences or practices, or
 - (ix) criminal record, that is also personal information; or
 - (b) health information about an individual; or
 - (c) genetic information about an individual that is not otherwise health information; or
 - (d) biometric information that is to be used for the purposes of automated biometric verification or biometric identification; or
 - (e) biometric templates.

Collection, use and disclosure of personal information

Under the Data Provision Requirements 2012, Dickens Assessment and Training Services is required to collect personal information about you and to disclose that personal information to the National Centre for Vocational Education Research Ltd (NCVER).

Your personal information (including the personal information contained on your enrolment form and your training activity data) may be used or disclosed by Dickens Assessment and Training Services for statistical,

regulatory and research purposes. Dickens Assessment and Training Services may disclose your personal information for these purposes to third parties, including:

- School – if you are a secondary student undertaking VET, including a school-based apprenticeship or traineeship;
- Employer – if you are enrolled in training paid by your employer;
- Commonwealth and State or Territory government departments and authorised agencies;
- NCVET;
- Organisations conducting student surveys; and
- Researchers

Personal information disclosed to NCVET may be used or disclosed for the following purposes:

- Issuing statements of attainment or qualification, and populating authenticated VET transcripts;
- facilitating statistics and research relating to education, including surveys;
- understanding how the VET market operates, for policy, workforce planning and consumer information; and
- administering VET, including programme administration, regulation, monitoring and evaluation.

You may receive an NCVET student survey which may be administered by an NCVET employee, agent or third party contractor. You may opt out of the survey at the time of being contacted.

NCVET will collect, hold, use and disclose your personal information in accordance with the Privacy Act 1988 (Cth), the VET Data Policy and all NCVET policies and protocols (including those published on NCVET's website at www.ncvet.edu.au).

Authority

Dickens Assessment and Training Services operates within the Standards for RTO's 2015 and therefore is required to record and report AVETMISS data for all learners under the National VET Provider Collection Data Requirements Policy.

Under the authority of Ministers responsible for Education and Training, and the registration requirements legislated for Registered Training Organisations under the National VET Regulator. Dickens Assessment and Training Services collects, manages, analyses, evaluates and communicates research and statistics about VET. Dickens Assessment and Training Services operates for the NSW Government Roads and Maritime Services (RMS) under the Approved Training Provider Agreement for Traffic Control Training Courses and therefore must comply with the RMS *Right to Access and Audit* any assessment papers, logbooks and course statistics.

Collection and use

Dickens Assessment and Training Services collects personal information, either directly or indirectly, that is reasonably necessary for, or directly related to its functions and activities. Some of the information collected may be regarded as 'sensitive' as defined by the Privacy Act. In broad terms the kinds of personal information and purposes for which it is collected are:

Solicited information:

- Contact information such as name, organisation, position, address, telephone, and email are collected for marketing, help-desk services (where needed), servicing data requests, managing funding grants, and for communicating with stakeholders and suppliers as part of day to day business.
- Names, addresses, phone numbers, emergency contact details and other employment related information is collected from employees for the purpose of managing human resources. The management of staff personal information complies with this policy.

Collection methods:

- *National VET data collections* - including the VET provider and financial collections and the apprentice and trainee collection. The data elements collected are prescribed by the AVETMIS Standard. The information is collected directly by registered training providers and apprenticeship centres and is then

submitted to Dickens Assessment and Training Services for managing, analysing, evaluating, and reporting.

- *Student Registration Forms* - The data elements collected are prescribed by the AVETMIS Standard. The information is collected directly by Dickens Assessment and Training Services and is reported to the National Centre for Vocational Education Research (NCVER) annually. Dickens Assessment and Training Services also uses this information to comply with the RMS Approved Training Provider Agreement for Traffic Control Training.
- *National VET surveys* - Including the Learner Outcomes Survey, the Survey of Employer Use and Views of the VET System. Data are collected via questionnaire endorsed by Dickens Assessment and Training Services' stakeholders.
- *Data requests* - Personal contact information is collected directly from individuals who make data requests either by telephone or email.
- *Help-desk* - Personal contact information is collected directly from individuals who request assistance with AVETMISS data submissions, including the AVETMISS Validation Software, and the Competency Completion Online System (CCOS); or who enquires about Dickens Assessment and Training Services business.
- *Research* - Dickens Assessment and Training Services' research component encompasses the management of funding applications. Dickens Assessment and Training Services' own research:
 - Funding applications: Personal information is collected directly from enrolment/completions.
- *Marketing* - Personal information is collected directly from individuals via enrolment forms for marketing material; and from stakeholders for day-to-day business and information dissemination.
- *Dickens Assessment and Training Services staff* - Personal information is collected from individuals on employment commencement.

Sensitive information:

Personal information collected by Dickens Assessment and Training Services that may be regarded as 'sensitive' under the Privacy Act includes:

- 'Disability' and 'long-term impairment status' (health); and 'indigenous status', 'language spoken at home', 'proficiency in spoken English', 'country of birth' (implies ethnic/racial origin). This information is specified in the AVETMISS data elements and is collected for the national VET data collections, national VET surveys, and may be collected for VET-related research.
- 'Dietary requirements' (health-related) are collected for event catering purposes only.
- Biographical information, which may contain information on 'affiliations' and 'membership of a professional or trade association' are obtained from key note speakers for event marketing purposes.
- 'Memberships of professional associations' and 'health and work injury information' is collected from Dickens Assessment and Training Services employees for HR management purposes.

Direct marketing

Dickens Assessment and Training Services respects an individual's right not to receive marketing material and provides an option within communications and on its website for individuals to unsubscribe from receiving marketing material. Dickens Assessment and Training Services conducts its marketing communications and dissemination of research and statistics in accordance with Australian Privacy Principle 7 (Direct marketing), the Spam Act 2003 (in respect of electronic communications), and the Do Not Call Register Act 2006. It is not, however, Dickens Assessment and Training Services' practice to 'cold call' for the purpose of marketing its products and services.

Google, clickstream data and cookies

- Dickens Assessment and Training Services uses Google for improving AVETMISS Validation Software, research, Google is a web service provided by Google Inc. Cookies are used to generate data on website activity and usage. The cookies, which include IP addresses, are transmitted to and stored in Google servers in the United States where they are used to compile web-use reports. Google may transfer this information to third parties, where required by law, or for information processing on its behalf. Google will not associate IP addresses with any other data held by Google. More information

on Google's privacy policy can be found at: <https://www.google.com.au/intl/en/policies/privacy/>. It is possible to disable cookies by adjusting web-browser setting and to opt-out of Google (<https://tools.google.com/dlpage/gaoptout>). Doing so, however, may affect web-site functionality.

- The web servers for the AVETMISS Validation Software, research websites automatically log information such as server address, date and time of visit and web pages accessed. No personal information is recorded. These logs are used for website management and improvement.

Unsolicited personal information:

If Dickens Assessment and Training Services should receive unsolicited personal information, it will be treated and managed according to the Australian Privacy Principles if found to be related to one of its collections, otherwise it will be destroyed or de-identified if lawful to do so.

Anonymity and pseudonymity

As far as practicable, Dickens Assessment and Training Services aims to offer individuals the options of anonymity and pseudonymity when collecting personal information.

It is possible to offer pseudonymity for marketing subscriptions and other online forms such as feedback, general contact queries, library reference queries and requests, webinars, and one-off surveys.

Anonymity of individuals can be offered for general telephone enquiries about Dickens Assessment and Training Services business or general help-desk assistance.

It is not practicable for Dickens Assessment and Training Services to offer the option of anonymity or pseudonymity for the following activities:

- Collection of data for the national VET data collections and national VET surveys; however, the data is de-identified for all other data administration, analysis, and reporting activities.
- Providing data for data requests as this involves sending the data to the requester and invoicing for the data provided.
- Resolving a help-desk query which requires investigation or assistance from Dickens Assessment and Training Services' IT department, or requires information to be sent to the requester, or requires online assistance in the use of AVETMISS Validation software (AVS) or the Competency Completion Online System (CCOS).
- Research requiring communication with specific individuals.
- Registration for research forums, conferences and other events where fees and payments are required.
- Document delivery requests as copyright law requires a record of the requester.
- HR management.

Notification of collection

Dickens Assessment and Training Services aims to notify individuals of the collection of their personal information before, or at the time of collection, or as quickly as possible thereafter. Notifications are usually in writing but may be verbal for telephone help-desk services, or research conducted by telephone interview.

- *VET data collections* – notification is given by registered training providers and apprenticeship centre's at the time of learner enrolment. This policy indicates that Dickens Assessment and Training Services is a recipient of the data collected by these entities.
- *National VET surveys* – notification is provided in the letter of invitation to participate in the surveys and at the time of collecting the information.
- *Help-desk* – notification is provided verbally by telephone when names and contact details are recorded in providing assistance.
- *Research and consultancy* – Notification is provided ahead of conducting research interviews or at the time of inviting individuals to participate in a survey. Where children are involved in the research, a Police check and children's privacy consent declaration is obtained.
- *Management of funding applications* – Notification is provided when: applicants apply for funding, reviewers are invited to be part of the editorial board, and when respondents are invited to participate in a survey.

- *Dickens Assessment and Training Services Staff* – Notification is provided on employment commencement

Disclosure of personal information

Dickens Assessment and Training Services does not disclose personal information other than for the purpose for which it was collected, or an individual has consented to a secondary purpose, or an individual would reasonably expect this (such as receiving communications about upcoming events), or if required by law.

Dickens Assessment and Training Services may share personal information with the Commonwealth government in accordance with Commonwealth contractual obligations. In these circumstances Dickens Assessment and Training Services will take reasonable steps to inform and seek consent from the individuals concerned and take all reasonable steps to ensure that the recipient handles the personal information according to the APPs.

Dickens Assessment and Training Services does not sell its mailing lists to third-parties for marketing purposes.

Dickens Assessment and Training Services does not disclose personal information to overseas recipients.

Government identifiers

Dickens Assessment and Training Services does not adopt or disclose a government related identifier of an individual as its own identifier, unless Dickens Assessment and Training Services is authorised by law and prescribed by regulations to do so.

Dickens Assessment and Training Services may use a government related identifier to identify an individual in relation to Dickens Assessment and Training Services' business activities; for example requiring an ABN number for the purpose of contracting services to suppliers and researchers, or asking for a registered training organisation number for verifying a caller's credentials before providing assistance with the AVETMISS Validation Software (AVS) or the Competency Completion Online System (CCOS), or requiring staff tax file numbers for payroll and tax purposes.

Management of Personal Information

Quality of personal information

Dickens Assessment and Training Services endeavors to ensure the personal information it collects and uses or discloses is accurate, up to date, complete and relevant. Dickens Assessment and Training Services routinely updates the information held in its customer relationship management system. In addition to periodically checking with stakeholders if their personal contact details have changed.

Access to and correction of personal information

Individuals may, subject to the exceptions prescribed by the Australian Privacy Principles, request access to and correction of their personal information where this is collected directly from individuals by Dickens Assessment and Training Services.

Dickens Assessment and Training Services does not charge for giving access to or for correcting personal information.

Requests for access to or correction of personal information should be made in writing and addressed to the Compliance Officer at info@datsservices.com.au. Requests will be answered within 14 business days.

Information retention and disposal

Personal information is held in electronic and paper format:

- Information collected for the national collections and national surveys is held in databases.

- Names and contact details of stakeholders are held in a customer relationship management system and email contact lists.
- Names and contact details collected during a research project may be held either in electronic form in Dickens Assessment and Training Services' document management system or in paper documents which are locked in cupboards and filing cabinets.
- Names and contact details collected for data and help-desk requests are held in electronic form in Dickens Assessment and Training Services' document management system.
- In accordance with copyright requirements, a paper copy is kept of all document delivery requests. These are held in locked cupboards.
- Names and contact details collected for event registrations and webinars are held in the databases of third-party web service providers within Australia.
- Personal staff information is held in a secure cabinet within the Head Office.
- Backup copies of all electronic files held in Dickens Assessment and Training Services' systems are kept in the event of system failure/loss. All backup copies of system files are secured.
- Student records are kept in a secure student management system for 30 years.

Dickens Assessment and Training Services retains personal information for as long as it is required for its business activities and functions, and for as long as we are legally required to retain the information or are required by or under a court/tribunal order to retain the information.

When personal information is no longer necessary for Dickens Assessment and Training Services' business functions, and it is lawful to do so, Dickens Assessment and Training Services destroys or takes reasonable steps to de-identify the information.

Information security

Dickens Assessment and Training Services takes active steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

- Dickens Assessment and Training Services' systems and internal network are protected from unauthorised access using appropriate technologies. Most system data transferred over the internet is protected by Secure Socket Level protocol (SSL). The inherent risks associated with data transmission over the internet are, however, commonly acknowledged. Individuals, who do not wish to provide their personal information via the online website forms have the option of mailing this information to Dickens Assessment and Training Services.
- Access to databases is protected through user log-on and password, and assignment of user access rights.
- All entities submitting data to Dickens Assessment and Training Services for the national data collections must be registered and have a unique log-on and password.
- Names and addresses of individuals are removed before fieldwork contractors submit data to Dickens Assessment and Training Services for the national surveys.
- Third-party providers used by Dickens Assessment and Training Services for surveys fieldwork, event management, and webinar hosting services are all located within Australia and are required to be compliant with the Australian Privacy Principles and offer appropriate safeguards to protect personal information.
- Dickens Assessment and Training Services' premises is fully secured. Paper documents containing names and addresses are required to be locked away and shredded in confidential bins when destroyed.

Complaints and concerns

Complaints or concerns about Dickens Assessment and Training Services' management of personal information should be directed in writing to Dickens Assessment and Training Services' Compliance Officer at info@datservices.com.au. Dickens Assessment and Training Services will respond in writing within 14 business days.