

**POLICY & PROCEDURE**  
**PRIVACY POLICY**

DOCUMENTS : Consent and Release Form  
Student Handbook  
Privacy Notice - NCVER

REFERENCES : Confidentiality & Non-Disclosure Policy  
: Legislative Compliance Policy  
: Marketing and Advertising Policy  
: Records Management Policy  
: *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth).*  
: *National Vocational Education and Training Regulator Act 2011*

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CEO CRANAplus

RESPONSIBLE OFFICER : CHIEF EXECUTIVE OFFICER

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## PURPOSE

CRANAplus is committed to protecting a person's privacy as it applies to the Privacy Act. The Act regulates how CRANAplus staff, contractors, students, volunteers and other stakeholders (individuals) collect, use, disclose and otherwise handle personal information. This policy describes how CRANAplus administers the personal information that it collects.

## POLICY

It is the policy of CRANAplus to assure the privacy of individuals at all times and to gain written authority from individuals for the sharing or dissemination of information directly related to the provision of its services.

## COLLECTION & USE OF PERSONAL INFORMATION

CRANAplus collects personal information for the primary purpose necessary to carry out its activities. The kind of personal information that CRANAplus will collect will depend on the circumstances and may include:

- name, date of birth, gender
- contact details
- education and qualifications
- skills and areas of interest
- career or course enquiries
- other professional memberships
- market research and surveys assessing customer satisfaction
- current and former employment details, including the name of your employer, duration and location of employment
- attendance on course
- survey information from events you attend or subscribe to
- IP address and dates and times of visits to CRANAplus' website
- any other personal information which will enable CRANAplus to process your application for course enrolment and/or membership.

When enrolling students in accredited courses CRANAplus is obliged to obtain Australian Vocational Education and Training Management of Information Statistical Standard data which includes:

- whether you are Aboriginal or Torres Strait Islander; and
- whether you have a disability.

CRANAplus generally collects personal information directly from the individual concerned, although there may be occasions when information is collected from third parties, such as employer or a family member who contacts CRANAplus on the individual's behalf, from contractors who supply services, business sites operating in Australia or from a publicly maintained record. If an individual does not provide the information requested by CRANAplus, it may not be able to provide them with CRANAplus services.

If a person provides personal information to CRANAplus about someone else, the person must ensure that they are entitled to disclose that information to CRANAplus and that, without CRANAplus taking any further steps required by privacy laws, CRANAplus may collect, use and disclose such information for the purposes described in this Privacy Policy.

Persons using the CRANAplus website must be aware that the site collects personal information if the individual purchases CRANAplus products/resources, enrolls in a course or applies for membership. Information submitted digitally (i.e. electronic data, using an electronic form, application or by sending an email) to CRANAplus is collected and used for the nominated purpose only.

CRANAplus may use personal information to manage its relationship with the individual stakeholder.

CRANAplus acknowledges that individuals provide personal information on a voluntary basis to assist to administer and provide quality services and outcomes on their behalf.

By providing CRANAplus with personal information, the person gives consent to CRANAplus using their information to contact them in order to provide marketing information of interest to them, including by mail, email, SMS and telephone.

## **DISCLOSURE OF INFORMATION**

CRANAplus uses and discloses personal information about an individual for the purposes stated above, where it has their consent to do so, or as otherwise required or authorised by law.

CRANAplus is required to disclose relevant personal information to the Australian Skills Quality Authority (ASQA) regarding compliance with the National VET Regulator Standards for registered training organisations see <https://www.education.gov.au/national-vet-data-policy-0>. CRANAplus is required by the National VET Provider Collection Data Requirements Policy to ensure participants acknowledge the privacy notice on enrolment. see <https://www.education.gov.au/national-vet-data-policy-0>

CRANAplus may retain other companies, contractors and volunteers to provide services for CRANAplus, including entities located outside Australia, who need to have access to an individual's personal information to perform their obligations. CRANAplus may use a back-up database or cloud-based service to store and process personal information. When a person provides CRANAplus with their personal information, they also consent to CRANAplus disclosing their information to entities located outside Australia for these purposes, as well as CRANAplus's related companies to allow those companies to use and disclose that information for the primary and ancillary purposes for which CRANAplus collects personal information stated above.

There are some exceptions to disclosing a person's information. CRANAplus discloses information about an individual to third parties including its related entities and/or government agencies without an individual's consent if:

- that information is directly related to the purpose for which it was collected and CRANAplus has no reason to believe that the person would object to disclosure; or
- the individual is reasonably likely to have been aware, or has been made aware, that information of that kind is usually disclosed to that other entity; or
- CRANAplus believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person;
- the disclosure is reasonably necessary for the enforcement of Australian law, criminal law, or of a law imposing a pecuniary penalty, or the protection of the public revenue, or
- the personal information relates to an individual's ethnic or racial origin, political opinions, religious or philosophical beliefs, trade union membership or sexual activities, unless the disclosure is necessary to prevent a serious and imminent threat to the life or health of the individual concerned or another person; or

The use or disclosure by CRANAplus of personal information does not apply to government related identifiers. CRANAplus does not adopt a government related identifier of an individual as its own identifier, unless the information is required under Australian law or a court/tribunal order.

## **INFORMATION ‘OPT OUT’ OPTION**

CRANAplus provides reasonable opportunity for an individual to **opt-out** of any activity that uses their personal information and removed from any CRANAplus database. The individual can contact CRANAplus on the relevant feature page, or contact the CRANAplus Privacy Officer to opt-out.

## **PHOTOS & JOURNAL ARTICLES**

All individuals enrolling in a CRANAplus course are provided the opportunity to consent by completing the Consent and Release Form for the use of course photos on the CRANAplus website or for use in journal articles *CRANAplus Quarterly magazines*.

## **PRIVACY POLICY PUBLICATION AND ANY CHANGES**

This policy is available to any person on CRANAplus’s website ([www.crana.org.au](http://www.crana.org.au)). If any person whom CRANAplus collects personal information is unable to access this website, at their request, CRANAplus can send them a copy of this policy at no fee, either by email or mail.

In order to ensure that prospective applicants and students have given their informed consent for their personal information to be disclosed as detailed within this policy, CRANAplus advises them prior to the commencement of the course or activity about consent processes and forms for consent.

CRANAplus *reserves the right* to amend this Privacy Policy at any time and notify you by posting an updated version of the Policy on CRANAplus’ website, so individuals are encouraged to review it frequently.

## **ACCESS AND CORRECTING INFORMATION CRANAPLUS KEEPS ABOUT YOU**

If requested, CRANAplus provides individuals access to their own Information, where reasonable, and in the manner requested by the individual and the individual can request correction and the amendment of Information about them to ensure the Information is accurate, complete and not misleading.

Requests to access or obtain a copy of personal information can be made by contacting the CRANAplus Privacy Officer using the contact details set out below. In requesting access to personal information, as an individual, they are advised of how they may access or obtain a copy of their personal information and any applicable fees within 10 days of CRANAplus receiving their written request.

If the CRANAplus Privacy Officer refuses access or to amend the personal information as requested by the individual, they will give the individual a written notice that sets out the:

- reasons for the refusal except to the extent that it would be unreasonable to do so; and
- mechanisms available to lodge a complaint as detailed below to CRANAplus about the refusal; and any other matter prescribed by the regulations.

## **IDENTIFIERS – Identification, Anonymity and Pseudonymity**

CRANAplus may collect government related identifiers, such as an individual’s student card number, to verify their identity and eligibility for a membership concession.

Due to the nature of CRANAplus’ core business, it’s usually impractical for individuals interacting with CRANAplus to have the option of not identifying themselves. For example, if the person wishes to enrol in and complete a course with CRANAplus. However, CRANAplus will, where lawful and practicable, give the individual the opportunity to not identify themselves or use a pseudonym, for example, when making an enquiry.

## **TRANS-BORDER OR INTERNATIONAL DATA FLOW**

In the course of its operations, CRANAplus may provide personal data to organisations outside of Australia for support and assistance as it uses cloud-based internet applications that are hosted outside of Australia for its operational business platform.

In such a case, CRANAplus has taken steps to ensure that the recipient IT back up service overseas treats the personal data in substantially the same way as would be required under Australian law. CRANAplus has taken reasonable steps to ensure that the off-shore (IT) back up service provider does not breach the Australian Privacy Principles.

## **CONCERNS/COMPLAINT ABOUT THE HANDLING OF PERSONAL INFORMATION**

CRANAplus is committed to providing a fair and responsive system for handling and resolving complaints. If individuals have any questions or concerns about this Privacy Policy or how their personal information has been handled by CRANAplus, they may contact the CRANAplus Privacy Officer using the contact details set out below.

CRANAplus Privacy Officer:

Phone: (08) 8408 8200 or

Email: [admin3@crana.org.au](mailto:admin3@crana.org.au) or

visit Adelaide Office, 29-31 Hakkinen Road, Wingfield SA 5013

CRANAplus will consider and respond to the individual's complaint within a reasonable period but no later than 30 days after receiving a complaint. If CRANAplus fails to respond to the complaint, or the individual is not satisfied with the CRANAplus response, they are entitled to make a complaint to the Office of the Australian Information Commissioner (OAIC). Further information is available on the OAIC website: <http://www.oaic.gov.au/privacy/privacy-complaints> or phone: 1300 363 992.

If CRANAplus receives notification that a privacy complaint is the subject of formal external enquiry or legal action, the application of any CRANAplus process is suspended until the external enquiry or action is completed.