

PP009 Information Privacy Policy

Building Skills Centre is committed to the APP Privacy principles, maintaining the privacy and confidentiality of its RTO personnel and participant records. Building Skills Centre complies with the *Privacy Act 1988 including the 13 Australian Privacy Principles (APPs)* as outlined in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

Building Skills Centre has reviewed (for the management of privacy risks) each stage of the information lifecycle, including collection, use, disclosure, storage, destruction and de-identification. Providing an overall framework for our privacy practices, Building Skills Centre has developed and implemented this APP Privacy Policy.

Building Skills Centre manages personal information in an open and transparent way. This is evident in the implementation of practices, procedures and system we outline in this policy, that ensure our compliance with the APPs and any binding registered APP code, and provide suitable procedures for Building Skills Centre personnel to be able to deal with related inquiries and complaints that may be received from time to time.

Building Skills Centre is committed to Ensuring the confidentiality, accuracy and security of all information it collects and stores; Only collecting information that is necessary for the functions of the organisation and only collecting it by fair and lawful means; Keeping others informed about the purpose for collecting information; Collecting information directly where possible; Only using and disclosing information in ways that are consistent with expectations; Being transparent about the kinds of information held; Providing access to the records held about a person to that person upon request and Limiting the amount of highly sensitive information held, where possible.

The following sections of this policy outline how we manage personal information.

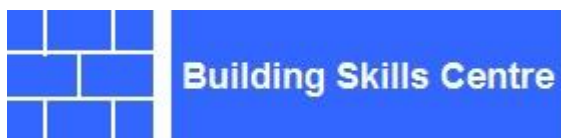
[Australian Privacy Principle 1 – Open and transparent management of personal information](#)

Purposes for information collection, retention, use and disclosure

Building Skills Centre retains a record of personal information about all individuals with whom we undertake any form of business activity. Building Skills Centre 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 teams;
- Promoting products and services;
- Conducting internal business functions and activities; and
- Requirements of stakeholders.

As a government registered training organisation, regulated by the VRQA, Building Skills Centre 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* and associated legislative instruments. In particular, the legislative instruments.



PP009 Information Privacy Policy

Examples of types of information collected include personal and contact details, employment information where relevant, statistical information, academic background, course enrolment information and preferences, training, participation and assessment information, fee and payment information and correspondence with and about individuals.

It is noted that Building Skills Centre is also bound by various State Government Acts requiring similar information collection, use and disclosure (particularly *Education Act(s)*, *Vocational Education & Training Act(s)* and *Traineeship & Apprenticeships Act(s)* relevant to state jurisdictions of Building Skills Centre RTO operations).

It is further noted that, aligned with these legislative requirements, Building Skills Centre delivers services through a range of Government funding contract agreement arrangements, which also include various information collection and disclosure requirements.

Individuals are advised that due to these legal requirements, Building Skills Centre discloses information held on individuals for valid purposes to a range of entities including:

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

Kinds of personal information collected and held

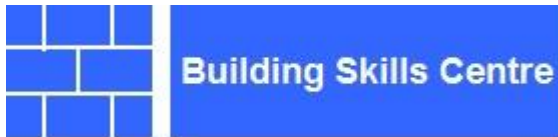
The following types of personal information are generally collected, depending on the need for service delivery:

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

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

- 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 Building Skills Centre collects personal information of more vulnerable segment of the community (such as children), additional practices and procedures are also followed. Please refer to Building Skills Centre's RTO's *Working with Children Policy and Procedures* for further information.



PP009 Information Privacy Policy

How personal information is collected

Building Skills Centre RTO'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 registration forms, enrolment forms or service delivery records) and the use of web-based systems (such as online enquiry forms, web portals or internal operating systems).

Building Skills Centre receives information from third party sources in undertaking service delivery activities. This may include information from such entities as:

- Governments (Commonwealth, State or Local);
- Australian Apprenticeships Centres;
- Employers (and their representatives), Job Network Providers, Schools, Guardians; and

How personal information is held

Building Skills Centre's approach to holding personal information includes robust storage and security measures at all times. Information on collection is:

- Stored in secure, fireproof, lockable cabinets, password protected systems, financial systems, 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. Building Skills Centre's IT systems are hosted externally with robust security to physical server locations and server systems access. Virus protection, backup procedures and ongoing access monitoring procedures are in place.

Destruction of paper-based records occurs as required, through the use of secure shredding and destruction services at all Building Skills Centre sites.

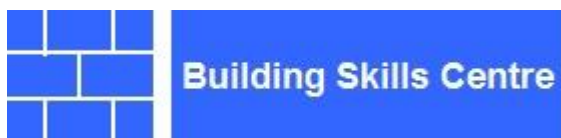
Retention and Destruction of Information

Building Skills Centre maintains an Archiving Register documenting the location for which personal information records are kept. Records are kept for a minimum of 30 years in an electronic and/or hardcopy file of the student record.

Specifically for RTO records, in the event of our organisation ceasing to operate the required personal information on record for individuals undertaking nationally recognised training with us would be transferred to the VRQA, as required by law.

Accessing and seeking correction of personal information

Building Skills Centre 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 the Director at the Building Skills Centre: 03 5249 5999 or email compliance@buildingskillscentre.com.au



PP009 Information Privacy Policy

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 Centres, Governments (Commonwealth, State or Local) and various other stakeholders.

In all cases where access is requested, Building Skills Centre will ensure that:

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

Making our APP Privacy Policy available

Building Skills Centre provides our APP Privacy Policy with all information being publicly available on our website. This website information is designed to be accessible as per web publishing accessibility guidelines, to ensure access is available to individuals with special needs as required.

In addition, this Privacy Policy is:

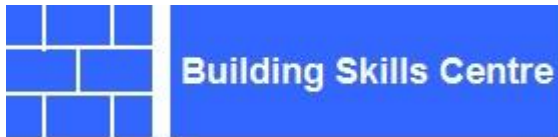
- Discussed with the student at time of enrolment;
- Included within our *Student Handbook*;
- Published on the Building Skills Centre website.
- If, in the unlikely event the Privacy Policy is not able to be provided in a particular format requested by an individual, we will explain the circumstances around this issue with the requester and seek to ensure that another appropriate method is provided.

Review and Update of this APP Privacy Policy

Building Skills Centre RTO 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 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 or in normal business activities;
- 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 Building Skills Centre's website and other relevant documentation (such as our RTO Student Handbook) for clients.



PP009 Information Privacy Policy

Australian Privacy Principle 2 – Anonymity and pseudonymity

Upon request, Building Skills Centre can provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us in relation to a particular matter, whenever practical. This includes providing options for anonymous dealings in cases of general course enquiries or other situations in which an individuals' information is not required to complete a request. For example, Individuals may deal with us by using a name, term or descriptor that is different to the individual's actual name wherever possible. This includes using generic email addresses that does not contain an individual's actual name, or generic user names when individuals may access a public component of our website or enquiry forms.

Requiring identification

Building Skills Centre must require and confirm identification in service delivery to individuals for nationally recognised course programs. We are authorised by Australian law to deal only with individuals who have appropriately identified themselves. That is, it is a *Condition of Registration* for all RTOs under the *National Vocational Education and Training Regulator Act 2011* that we identify individuals and their specific individual needs on commencement of service delivery, and collect and disclose Australian Vocational Education and Training Management of Information Statistical Standard (AVETMISS) data on all individuals enrolled in nationally recognised training programs. Other legal requirements, as noted earlier in this policy, also require considerable identification arrangements.

There are also other occasions also within our service delivery where an individual may not have the option of dealing anonymously or by pseudonym, as identification is practically required for us to effectively support an individual's request or need.

Australian Privacy Principle 3 – Collection of solicited personal information

Building Skills Centre only collects personal information that is reasonably necessary for our business activities. The information supplied by individuals will only be used to provide information about training opportunities, to enable efficient administration, and to maintain accurate and detailed student and client records of course participation, progress and outcomes. If an individual chooses not to provide certain information, then Building Skills Centre may be unable to provide some services or provide appropriate information.

We only collect sensitive information in cases where the individual consents to the sensitive information being collected, except in cases where we are required to collect this information by law, such as outlined earlier in this policy. All information we collect is collected only by lawful and fair means. We only collect information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner.

Australian Privacy Principle 4 – Dealing with unsolicited personal information

Building Skills Centre may from time to time receive unsolicited personal information. Where this occurs we promptly review the information to decide whether or not we could have collected the information for the purpose of our business activities. Where this is the case, we may hold, use and disclose the information appropriately as per the practices outlined in this policy. Where we could not have collected this information (by law or for a valid business purpose) we immediately destroy or de-identify the information (unless it would be unlawful to do so).

PP009 Information Privacy Policy

Australian Privacy Principle 5 – Notification of the collection of personal information

Whenever Building Skills Centre collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.

Our notifications to individuals on data collection include:

- Building Skills Centre's Privacy Notice;
- The facts and circumstances of collection and data use are provided at time of enrolment;
- If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection;
- The purpose of collection, including any primary and secondary purposes;
- The consequences for the individual if all or some personal information is not collected;
- Other organisations or persons to which the information is usually disclosed, including naming those parties;
- A link to this Privacy Policy on our website or explain how it may be accessed; and
- Advice that this Privacy Policy contains information about how the individual may access and seek correction of the personal information held by us; and how to complain about a breach of the APPs, or any registered APP code, and how we will deal with such a complaint.

Where possible, we ensure that the individual confirms their understanding of these details, such as through signed declarations, website form acceptance of details or in person through questioning.

Collection from third parties (if applicable)

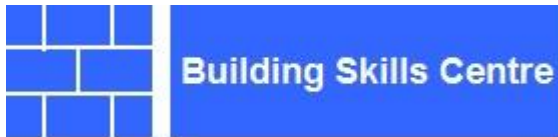
Where Building Skills Centre collects personal information from another organisation, we:

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

Australian Privacy Principle 6 – Use or disclosure of personal information

Building Skills Centre only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected, or secondary purposes in cases where:

- An individual consented to a secondary use or disclosure;
- An individual would reasonably expect the secondary use or disclosure, and that is directly related to the primary purpose of collection; or
- Using or disclosing the information is required or authorised by law.



PP009 Information Privacy Policy

Building Skills Centre will not disclose an individual's information to another person or organisation unless the individual concerned has been made aware that information has been requested by a person or organisation, ensuring the individual concerned has given written consent. Information may be disclosed if the Building Skills Centre 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 of another person; the disclosure is required or authorised by or under law; the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.

Privacy Breach or Disclosure

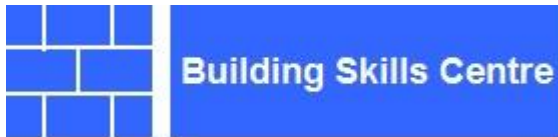
Unauthorized disclosure or breach of privacy, attempted unauthorized disclosure, or misuse of any personal information collected must be notified to the Director of the Building Skills Centre and reported to funding bodies via the SVTS. A full investigation will be undertaken and the outcome communicated to relevant departments and the individual involved.

Requirement to make a written note of use or disclosure for this secondary purpose

Where information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of public revenue, Building Skills Centre shall include in the record containing that information, a note of the disclosure.

Should Building Skills Centre use or disclose personal information in accordance with an 'enforcement related activity' (not including external audit), we will make a written note of the use or disclosure, including the following details:

- The date of the use or disclosure;
- Details of the personal information that was used or disclosed;
- The enforcement body conducting the enforcement related activity;
- If the organisation used the information, how the information was used by the organisation;
- The basis for our reasonable belief that we were required to disclose the information.



PP009 Information Privacy Policy

[Australian Privacy Principle 7 – Direct marketing](#)

Building Skills Centre does not use or disclose the personal information that it holds about an individual for the purpose of direct marketing, unless consent has been obtained. Building Skills Centre provides the opportunity that the individual may request to opt out of direct marketing by not completing the required consent at time of enrolment.

[Australian Privacy Principle 8 – Cross-border disclosure of personal information](#)

Building Skills Centre does not disclose personal information about an individual to any overseas recipient.

[Australian Privacy Principle 9 – Adoption, use or disclosure of government related identifiers](#)

Building Skills Centre does not adopt, use or disclose a government related identifier related to an individual except:

- In situations required by Australian law or other legal requirements;
- Where reasonably necessary to verify the identity of the individual;
- Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority; or
- As prescribed by regulations.

[Australian Privacy Principle 10 – Quality of personal information](#)

Building Skills Centre takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. We also take reasonable steps to ensure that the personal information we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant. This is particularly important where:

- When we initially collect the personal information; and
- When we use or disclose personal information.

We take steps to ensure personal information is factually correct. In cases of an opinion, we ensure information takes into account competing facts and views and makes an informed assessment, providing it is clear this is an opinion. Information is confirmed up-to-date at the point in time to which the personal information relates.

Quality measures in place supporting these requirements include:

- Internal practices, procedures and systems to audit, monitor, identify and correct poor quality personal information (including training staff in these practices, procedures and systems);

PP009 Information Privacy Policy

- Protocols that ensure personal information is collected and recorded in a consistent format, from a primary information source when possible;
- Ensuring updated or new personal information is promptly added to relevant existing records;
- Reminding individuals to update their personal information at critical service delivery points (such as completion) when we engage with the individual; and
- Contacting individuals to verify the quality of personal information where appropriate when it is about to be used or disclosed, particularly if there has been a lengthy period since collection;

Australian Privacy Principle 11 — Security of personal information

Building Skills Centre takes active measures to consider whether we are able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We destroy or de-identify personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.

Access to Building Skills Centre offices and work areas is limited to our personnel only - visitors to our premises must be authorised by relevant personnel and are accompanied at all times. With regard to any information in a paper-based form, we maintain storage of records in an appropriately secure place to which only authorised individuals have access.

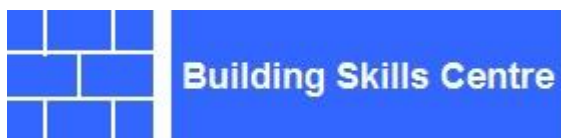
Regular staff training and information bulletins are conducted with Building Skills Centre personnel on privacy issues, and how the APPs apply to our practices, procedures and systems. Training is also included in our personnel induction practices.

We conduct ongoing internal audits (at least annually and as required) of the adequacy and currency of security and access practices, procedures and systems implemented.

Australian Privacy Principle 12 — Access to personal information

Individuals have the right to request or obtain a copy of their information, including personal details, contact details and information relating to course participation and progress. Requests to access or obtain a copy of the records must be made to the Director using the FS029 Access to Records Request Form which can be emailed to compliance@buildingskillscentre.com.au. There is no charge for a student request to access their records.

Where Building Skills Centre holds personal information about an individual, we provide that individual access to the information on their request. In processing requests, we ensure, through confirmation of identity, that the request is made by the individual concerned, or by another person who is authorised to make a request on their behalf.



PP009 Information Privacy Policy

Australian Privacy Principle 13 – Correction of personal information

Building Skills Centre takes reasonable steps to correct personal information we hold, to ensure it is accurate, up- to-date, complete, relevant and not misleading, having regard to the purpose for which it is held. Should an individual consider the records that Building Skills Centre holds about them to be incorrect, incomplete, out of date or misleading, they can request that the information be amended.

Where a record is found to be inaccurate, a correction will be made. Where an individual requests that a record be amended because it is inaccurate, but the record is found to be accurate, the details of the request for amendment will be noted on the record.

- Notify any third parties of corrections made to personal information, if this information was previously provided to these parties.
- In cases where we refuse to update personal information, we:
 - Give a written notice to the individual, including the reasons for the refusal and the complaint mechanisms available to the individual;
 - Upon request by the individual whose correction request has been refused, take reasonable steps to associate a statement with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading;
- Complete all actions free of charge.

Correcting at Building Skills Centre's initiative

We take reasonable steps to correct personal information we hold in cases where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading (that is, the information is faulty). This awareness may occur through collection of updated information, in notification from third parties or through other means.

Document details

Document No.	PP009
Document Name	Information Privacy Policy
Responsibility:	Director
Status:	Approved
Version:	V6
Approved By:	Dale Emmerson
Approval Date:	22-08-2025
Last Review Date:	30-06-2025
Next Review Date:	30-06-2026