

Policy name:	Privacy Policy	Version:	6
Policy owner:	CEO		
Approved by:	CEO		
Approved date:	May 2017	Review date:	Nov 2023

1. INTRODUCTION

- 1.2 Through the Registered Training Organisations (RTOs), Selmar Institute of Education (121531), Practical Outcomes (21857), and Royal College of Healthcare (31994), Catalyst Education provides training in nationally accredited qualifications across the early childhood and school aged education, community services: ageing and disability industries, across Victoria, NSW and Queensland as well as delivering short courses and professional development to maximise the potential of the workforce within the industry.
- 1.3 All employees engaged in any part of the business are bound by the Privacy Act 1988 (Cth), the Australian Privacy Principles (APP) and the Health Records Act 2001 (Vic) which regulate the collection, use and disclosure of personal information.
- 1.4 Catalyst Education and its entities (we, our, us) recognises the importance of privacy and the rights of individuals in relation to their personal information.

2 PURPOSE

2.1 The purpose of this Privacy Policy is to explain;

- The scope of our Privacy Policy;
- Our policy principles;
- What is personal information;
- What personal information do we collect and hold;
- How we collect your personal information;
- Why do we collect personal information;
- Disclosure of your personal information;
- What happens if you do not provide your personal information;
- Access to your personal information;
- Your right to have personal information corrected;
- How we protect the integrity of your personal information;
- Your obligations to privacy security;
- Your right to make a privacy complaint; and
- Privacy Officer contact details.

3 SCOPE

3.1 This policy applies to:

Directors	Officers	Employees	Learners	Stakeholders Consultants (including employees of each)	/Suppliers/
✓	✓	✓	✓	✓	

4 POLICY PRINCIPLES

4.2 Catalyst Education employees and all those in scope will adhere at all times to the Privacy Act and the Australian Privacy Principles (APP).

5. WHAT IS PERSONAL INFORMATION

5.1 The term “personal information” has the meaning given to it in the applicable the [Privacy Act 1988](#) (Cth). In general terms, “personal information” means any information that can be used to identify an individual. This may include an individual’s name, address, telephone number, email address, credit card details, account number, and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

5.2 The information may be collected from you directly or provided to us by another party including but not limited to employers, online listing or aggregator providers.

6. WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

6.1 We may collect and hold the following types of personal information:

- name;
- mailing and/ or street address;
- email address;
- telephone mobile and landline numbers;
- date of birth;
- profession, occupation or job title;
- credit card details;
- information for government funding purposes;
- contact tracing information;
- any additional information relating to you that you provide to us directly through our website/s or indirectly through use of our websites or online presence, through our representatives or otherwise;
- how you use our website/s,
- your browsing activity when you visit our website/s;

- details of the products and services you have purchased from us or our customers (on whose behalf we may provide products or services and may administer or host websites) or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries; and
- information you provide to us through our service centre, customer surveys or visits by our representatives from time to time.

6.2 Specific information - learners

- your fees and payment history; and
- Tax File Number (TFN).

6.3 Employees

6.3.1 Where you are our employee, we may collect, hold, use and disclose your personal information for all purposes connected with our employment relationship. This includes hiring you, training you, administering your personnel records (including pay and leave records), and managing your performance.

6.3.2 We may also use your personal information for other purposes related to those described above, and/or for a purpose for which you would reasonably expect it to be used, as permitted by the applicable Act.

6.3.3 Except as provided below, your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy. We do not disclose personal information we obtain when acting on behalf of one client, to any other client, unless directed by the client.

6.3.4 Catalyst sometimes handles personal information relying on exemptions under the applicable Act. Under the Australian Privacy Act 1988 (Cth), these include exemptions in relation to

- (i) employee records;
- (ii) related bodies corporate;
- (iii) provision of services to State or Territory authorities; and
- (iv) overseas operations relating to personal information of non-Australians. Any permitted handling of personal information under such exemptions will take priority over this Privacy Policy to the extent of any inconsistency.

Specific information – employees

- contract tracing information;
- personnel records including your employment history, resume, qualifications employment contract, reference checks and undertakings;
- personal identification such as drivers licence or passport;
- medical history;
- emergency contact,
- remuneration records;
- leave records;
- Tax File Number (TFN)/ tax details/ tax status;
- criminal record checks;

- banking details;
- superannuation records;
- training records;
- performance and/ or disciplinary records;
- physical site security including surveillance camera data
- how you use our website/s including but not limited to the intranet,
- your digital footprint including
 - ❖ browsing activity when you visit our website/s; and
 - ❖ our download activity when you visit our website/s.

6.4 Specific information– suppliers

- Contractual information including business/ trading name;
- data from due diligence activities;
- address details;
- contact details;
- contract tracing information;
- billing information;
- payment details;
- names of employees;
- business records;
- insurance details;
- licences; and
- information about goods and services supplied.

6.5 It is important to appreciate that some of the personal information we collect and hold is done so by us when we are acting as the service provider of our customer.

6.6 We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous data or aggregated information about how users use our websites. We do not re-identify this information to turn it into personal information.

6.7 Sensitive information

6.7.1 We will only collect sensitive information where you consent to the collection of the information and the information is reasonably necessary for one or more of the Company's functions or activities.

6.7.2 Sensitive information includes but is not limited to health/ medical information. We ask for full disclosure of all pre-existing injuries, diseases and medical conditions (that you are aware of) that may be affected by employment or learning with us.

6.8 Unsolicited personal information

6.8.1 This is defined as personal information that we receive which we did not solicit. Unless we determine that we could have collected the personal information in line with the APPs or the information is contained within a Commonwealth record, we must destroy the information to ensure it is de-identified.

7. HOW WE COLLECT YOUR PERSONAL INFORMATION

7.1 Personal information is only collected by lawful and fair means in accordance with the Act. We collect your personal information directly from you unless it is unreasonable or impracticable to do so.

7.2 We collect personal information that is reasonably necessary for one or more of its functions or activities.

7.3 When collecting personal information from you, we may collect in ways including:

- through your access and use of our website, or websites hosted by us including via cookies apps, email, online advertisements. Refer to our Website Usage and Cookies policy on our website;
- through your use of telephone and mobile communication (including but not limited to fixed line IVR services, SMS and MMS);
- through your use of electronic devices including tablets, supplied by us to you, or otherwise connecting to our systems in order to facilitate and enable you to perform your duties or to provide services to us;
- during conversations between you and our representatives;
- during correspondence between you and our representatives, including electronic correspondence; and/ or
- when you complete an application, contract or purchase order.

7.4 In respect of personal information which is provided to us by third parties, we do seek assurances from the third party that all such personal information has been collected lawfully and in compliance with the Privacy Act and that all required consents have been obtained for, and disclosure statements made in respect of, the intended use of that personal information.

7.5 Catalyst however will not be responsible for, and accepts no liability in respect of, any failure by a third party to do so.

7.6 Third party companies may include data providers and brokers, credit reporting bodies, law enforcement agencies and government entities.

8. WHY DO WE COLLECT PERSONAL INFORMATION?

8.1 We collect personal information from you for the following purposes:

- 8.1.1 To allow us to lawfully carry out our functions and activities;
- 8.1.2 To enable us to deliver courses, products and services that are part of your registration;
- 8.1.3 To provide you with further information about the courses, products and services;
- 8.1.4 To personalise and customise your learning experiences with us;
- 8.1.5 to answer enquiries and provide information or advice about existing and new products or services;
- 8.1.6 to provide you with access to protected areas of our websites;
- 8.1.7 to assess the performance of our websites and to improve the operation of our websites;

- 8.1.8 To help us review, manage and enhance our services;
- 8.1.9 To communicate more effectively with you;
- 8.1.10 For administration purposes, including charging, invoicing and collecting debts;
- 8.1.11 To promote courses, products and services which we consider may be of interest to you; and
- 8.1.12 We may also collect, hold, use and/or disclose personal information if you consent or if required or authorised under law.
- 8.1.13 to conduct business processing functions including providing personal information to our related bodies corporate, clients, contractors, service providers or other third parties;
- 8.1.14 to assess the provision of, and provide credit, to you;
- 8.1.15 for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of Catalyst, its related bodies corporate, clients, contractors or service providers;
- 8.1.16 to provide your updated personal information to our related bodies corporate, clients, contractors or service providers;
- 8.1.17 to update our records and keep your contact details up to date;
- 8.1.18 to process and respond to any complaint made by you; and
- 8.1.19 to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political subdivision of a country).

9. DISCLOSURE OF YOUR PERSONAL INFORMATION

- 9.1 We will only use and disclose your personal information for purposes which are related to those identified in this policy or if we get your consent to do so and it is in accordance with this Privacy Policy and the Privacy Act.
- 9.2 You acknowledge and agree that we may disclose your personal information for any of the purposes for which it is was collected, as indicated in this policy, or where it is under a legal duty to do so.
- 9.3 We will not use your personal information for any purpose for which you would not reasonably expect us to use it for. Additionally, we will not disclose your sensitive information without your consent, unless there is a need to disclose such information in accordance with the Privacy Act or to comply with any other regulatory requirement or public health matter.
- 9.4 Disclosure will usually be internally and to related entities.
- 9.5 Before we disclose personal information about you to a third party, we will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.
- 9.6 We may use or disclose personal information (other than sensitive information) about you for the purpose of advising you of new courses and/or services being offered by us.

- 9.7 We may use or disclose sensitive information about you for the purpose of direct marketing if you have consented to the use or disclosure of the information for that purpose.
- 9.8 You can use our unsubscribe option to stop receiving communications from us.
- 9.9 Our data is hosted by a third party supplier, or using third party supplier however the third party organisation does not have access and is not able to use our data.
- 9.10 We may use third party providers to collect and analyse customer information. E.g. third parties may include but not be limited to survey tools such as Survey Monkey. In the event such sites ask users (employees or learners) to register at the end of the process, this is the choice of the user and the user is advised this voluntary registration may bind them to the site.

10. ACCESS TO YOUR PERSONAL INFORMATION

- 10.1 If we hold personal information about you, you may request access to that information by putting the request in writing and sending it to the Privacy Officer.
- 10.2 We will respond to any request within a reasonable period, and a charge may apply for giving access to the personal information.
- 10.3 There are certain circumstances in which we may refuse to grant you access to the personal information. In such situations we will give you written notice that sets out:
- 10.3.1 the reasons for the refusal; and
 - 10.3.2 the mechanisms available to you to make a complaint.

11. YOUR RIGHT TO HAVE PERSONAL INFORMATION CORRECTED

- 11.1 If we hold personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, we must take steps as are reasonable to correct the information.
- 11.2 If we hold personal information and you make a request in writing addressed to the Privacy Officer to correct the information, we must take steps as are reasonable to correct the information and we will respond to any request within a reasonable period.
- 11.3 There are certain circumstances in which we may refuse to correct the personal information. In such situations we will give you written notice that sets out:
- 11.3.1 the reasons for the refusal; and
 - 11.3.2 the mechanisms available to you to make a complaint.
- 11.4 If we correct personal information that has previously been supplied to a third party and you request us to notify the third party of the correction, we will take such steps as are reasonable to give that notification unless impracticable or unlawful to do so.

12. INTEGRITY AND SECURITY OF YOUR PERSONAL INFORMATION

12.1 We will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that we:

12.1.1 collect is accurate, up-to-date and complete; and

12.1.2 uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date and complete.

12.2 We will take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure.

12.3 If we hold personal information, it no longer needs the information for any purpose for which the information may be used or disclosed, the information is not contained in any Commonwealth record and we are not required by law to retain the information, it will take such steps as are reasonable in the circumstances to destroy the information or to ensure it is de-identified.

13. YOUR OBLIGATIONS TO PRIVACY SECURITY

13.1 All employees have an obligation to protect the personal information they hold from misuse, interference, loss, and from unauthorised access, modification or disclosure.

13.2 All employees must take reasonable steps entities if required to destroy or de-identify personal information that they hold once it is no longer needed (unless an exception applies).

13.3 If you feel that the personal information that we are requesting at any point is not information that you wish to provide, please raise this with us.

14. YOUR RIGHT TO MAKE A PRIVACY COMPLAINT

14.1 You have a right to complain about our handling of your personal information if you believe we have breached the APPs.

14.2 If you wish to make such a complaint to us, you should first contact the Privacy Officer in writing.

14.3 Your complaint will be dealt with in accordance with our complaints procedure and we will provide a response within a reasonable period.

14.4 If you are unhappy with our response to your complaint, you may refer your complaint to the [Office of the Australian Information Commissioner](#).

15. CONTACT DETAILS

Telephone number: 03 9516 6140.

Email: info@catalysteducation.com.au.

Postal address: 80 Dorcas St, South Melbourne, Victoria

16. POLICY VERSION AND REVISION INFORMATION

Version #	Approval Date	Approved by	Details
1	May 2017	CEO	Document creation
2	June 2018	CEO	Reformatted document
3	February 2019	CEO	Updated approver
4	August 2019	CEO	Updated address
5	February 2020	Compliance	Updated Policy Owner
6	October 2020	CEO	Reviewed and updated policy