

Privacy Policy

Version: 8

Policy Owner: Head, Data & Technology

Approved by: Board

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Next review Date: July 2028

Purpose

The purpose of this Policy is to:

- clearly communicate the personal information handling practices of For Purpose Education;
- provide individuals with a better understanding of the types of personal information that For Purpose Education holds;
- provide information about how to access or correct personal information we hold; and
- enhance the transparency of For Purpose Education's operations.

Scope

This policy applies to all activities, and employees involved in those activities, that take place:

- on work premises.
- elsewhere where activities are undertaken in the course of employment including when representing For Purpose Education in virtual and online settings; and
- at work-related activities, such as social functions.

Reference to employees within the policy includes both contractors and volunteers.

Definitions

Term	Definition
Australian Privacy Act	Is the Australian legislation that deals with information about privacy rights and how organisations and agencies must handle personal information.
Australian Privacy Principles (APP)	Outline principles for how personal information is handled. These principles may be applied across different technologies and uses of personal information over time.
Data	Refers to the collective information related to a company and its operations. This can include any statistical information, personal, raw analytical data, customer feedback data, sales numbers and other sets of information.
Data Breach	A data breach occurs when personal information that an entity holds is subject to unauthorised access or disclosure or is lost.

Information Privacy	Is about promoting the protection of information that says who we are, what we do and what we believe.
Personal information	Includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances. For example, personal information may include: • an individual's name, signature, address, phone number or date of birth • sensitive information • credit information • employee record information • photographs • internet protocol (IP) addresses • voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique) • location information from a mobile device (because it can reveal user activity patterns and habits).
Privacy	Is a fundamental human right that underpins freedom of association, thought and expression, as well as freedom from discrimination.
Sensitive information	Is personal information that includes information or an opinion about an individual's: • racial or ethnic origin • political opinions or associations • religious or philosophical beliefs • trade union membership or associations • sexual orientation or practices • criminal record • health information • some aspects of biometric information.
Serious harm	Refers to a situation where a breach of personal information is likely to result in negative consequences for an individual/s such as financial harm, reputational damage, social impact.

Principles

Security and compliance

- We understand and adhere to all regulatory and legislative obligations.
- We take every reasonable step to ensure all collected information is accurate, up to date and complete and relevant, having regard to the purpose of the use or disclosure.
- We take reasonable steps to protect personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure.
- Where appropriate we securely destroy or de-identify personal information.

Transparency

- We only collect information that is legally required and for a clear business purpose. We inform all parties what data is collected, how their data will be used, stored, shared and destroyed.



Access to personal information

- We give access to personal information on request.
- We correct the personal information we hold about individuals based on verifiable evidence from the individual.

What personal information do we collect and hold?

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.

What specific information do we collect and hold for learners?

1. Personal Information

- Full Name: First name, last name, and any other relevant personal identifiers.
- Contact Information: Home address, phone numbers, email address.
- Date of Birth: Used for age verification and to assess eligibility for certain courses or funding.
- Gender: For demographic and reporting purposes, sometimes collected as part of data analysis for equal opportunity and compliance with anti-discrimination laws.
- Emergency Contact Details: Name and contact details of someone to contact in case of an emergency.

2. Identification Information

- Unique Student Identifier (USI): A unique code issued to every learner in Australia that tracks their vocational education and training (VET) achievements.
- Proof of Identity: For verification purposes, such as passport, driver's license, or other government-issued identification.
- Visa/Residency Information: For international students, this may include visa status and

nationality. For domestic learners, this may include details of their residency status (e.g., Australian citizen, permanent resident).

3. Educational and Academic History

- **Prior Qualifications:** Details of any previous education, including completed courses, qualifications, and USI transcripts.
- **Academic Records:** Information on the learner's progress, grades, or assessment results.
- **Language and Literacy Levels:** Sometimes Always collected to assess learner eligibility for certain courses.

4. Course-Related Information

- **Course Enrolment Details:** Information on the course or qualification the learner is enrolling in, including course code, start and end dates, and units of competency.
- **Assessment Records:** Including completed assessments, results, feedback, and competency outcomes.
- **Learning and Support Needs:** Details of any specific learning support requirements, including disability support or special accommodations needed.
- **Attendance Records:** Tracking the learner's attendance, particularly for courses with face-to-face learning components.
- **Payment Information:** Payment details for course fees, including financial arrangements and payment history.

5. Employment Information

- **Employer Details:** For learners in workplace-based training or apprenticeships, details of their employer or training contract may be required.
- **Employment Status:** Information on whether the learner is employed, unemployed, or seeking work, particularly for government funding purposes or eligibility for specific training programs.
- **Work Placement/Work Experience Details:** If part of the training involves workplace assessments or internships, relevant workplace information will be collected.

6. Health and Safety Information

- **Medical History:** Information related to the learner's health and safety while studying, particularly in relation to any medical conditions or disabilities that may require accommodations during the course.
- **Emergency Medical Information:** For students enrolled in practical courses or those that involve physical activity, health-related details may be collected to ensure safety (e.g., allergies, medications).
- **First Aid Certification:** If the learner is involved in a course related to health and safety, information about their first aid qualifications may be collected.

7. Government Funding and Subsidy Information

- **Funding Eligibility:** Information about the learner's eligibility for government funding or subsidies, such as eligibility for VET Student Loans, JobTrainer, or Skills First, Smart and Skilled or VET Funding Contracts. **Concessional Status:** For students eligible for concessional rates (e.g., disadvantaged students, Indigenous learners), personal circumstances will be required to assess

eligibility.

- Tax File Number (TFN)
- Fees and payment history

8. Demographic Information (Optional)

- Cultural Background: Information about the learner's cultural background may be collected for statistical purposes, such as the learner's Aboriginal or Torres Strait Islander status.
- Language Spoken at Home: This may be collected for demographic and language support purposes.
- Disability Status: To determine if the learner has any disabilities that may require additional support or accommodations during the course.

9. Consent and Declarations

- Consent to Collect and Use Data: Learners are generally asked to sign consent forms allowing the For Purpose Education entities to collect and use their personal information as part of the enrolment process.
- Declarations of Accuracy: Learners may need to declare that the information provided is accurate and up-to-date, and that they understand privacy policies and procedures.
- Opt-in for Marketing or Communication: Learners may also provide consent to receive marketing materials or other communications from their respective RTO.

What specific information do we collect and hold for employees?

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.
- 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.
- 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.
- For Purpose Education sometimes handles personal information relying on exemptions under the applicable Act. Under the Australian Privacy Act 1988 (Cth), these include exemptions in relation to:
 - employee records;
 - related bodies corporate;
 - provision of services to State or Territory authorities; and
 - 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 v browsing activity when you visit our website/s; and
- your download activity when you visit our website/s

For Purpose Education ensures all employee data is stored securely, and that all usage complies with the Australian Privacy Act 1988. In the event of any breach of personal data we will follow our Data Breach Management Procedure.

What specific information do we collect about 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.

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.

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.

Sensitive Information

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.

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.

Unsolicited Personal Information

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.

How we collect your personal information

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

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.

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

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

Why do we collect your personal information

We collect personal information from you for the following purposes:

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



- to assess the performance of our websites and to improve the operation of our websites;
- To help us review, manage and enhance our services;
- To communicate more effectively with you;
- For administration purposes, including charging, invoicing and collecting debts;
- To promote courses, products and services which we consider may be of interest to you; and
- We may also collect, hold, use and/or disclose personal information if you consent or if required or authorised under law.
- to conduct business processing functions including providing personal information to our related bodies corporate, clients, contractors, service providers or other third parties;
- to assess the provision of, and provide credit, to you;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of For Purpose Education, its related bodies corporate, clients, contractors or service providers;
- to provide your updated personal information to our related bodies corporate, clients, contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- 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).

Disclosure of your Personal Information

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.

You acknowledge and agree that we may disclose your personal information for any of the purposes for which it was collected, as indicated in this policy, or where it is under a legal duty to do so.

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.

Disclosure will usually be internally and to related entities.

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.

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.

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.

You can use our unsubscribe option to stop receiving communications from us.

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.

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, Microsoft Forms, Google Forms,

Qualtrics. 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.

Access to your Personal Information

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.

We will respond to any request within a reasonable period, and a charge may apply for giving access to the personal information.

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:

- the reasons for the refusal; and
- the mechanisms available to you to make a complaint.

Your Right to have your Personal Information Corrected

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.

If we hold personal information and you make a request in writing addressed to info@fpeducation.com.au 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.

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:

the reasons for the refusal; and

the mechanisms available to you to make a complaint.

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.

Integrity and Security of your Personal Information

We will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that we collect is accurate, up-to-date and complete; and uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date and complete.

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.

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.

Your obligations to Privacy Security

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

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).

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.

Your Right to Make a Privacy Complaint

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

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

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

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

Contact Us

Web: www.fpeducation.com.au

Telephone number: 03 9516 6140.

Email: info@fpeducation.com.au.

Postal address: Level 4, 100 Dorcas St, Southbank, Victoria

Responsibilities

Role	Key Responsibilities
Board	Approve the Privacy policy
	Ensure the budget has adequate resources for privacy compliance and training
CEO	Monitor privacy risks and ensure proper reporting and mitigation
	Ensure the allocation of necessary resources for privacy management
Head, Data & Technology	Ensure the effective implementation and compliance
	Review the policy to ensure compliance with changes to legislation
Admin Team	Make corrections to data upon receipt of the Change of Personal Details form
	Confirm to Manager the requested change has been verified as correct and finalised
People & Culture	Manage employee data in compliance with privacy laws
	Conduct privacy training and awareness programs for employees
	Implement data security and access control measures for employee data
	Handle requests related to employee data access, corrections, and confidentiality
Employees	Comply with privacy policies and data handling procedures
	Safeguard personal information and report potential breaches
	Only use official information for the work-related purpose it was intended

	Ensure that confidential information, in any form, cannot be accessed by unauthorised persons.
	Ensure sensitive information is only be provided to people, either within or outside For Purpose Education, who are authorised to have access. If in doubt, seek advice from line managers regarding who is authorised to have access.
	Always exercise caution and sound judgment in discussing other people's personal information with other departmental employees. Information is to be limited to persons within the business to conduct their duties in the workplace.
	Report any breaches promptly including full detail of the issue.
	Participate in privacy training and ensure compliance with organisational guidelines

References and Related Policies

Reference	Document type
RTO Standards	Regulation
Australian Privacy Principles (APP)	Regulation
Code of Conduct	Code
Communications Policy	Policy
Funding contracts	Contractual partner
Health Records Act	Legislation
National VET Data	Policy
Notifiable Data Breaches Scheme – Privacy Amendment Act 2017	Scheme
Privacy Act 1988	Legislation
Privacy and Other Legislation Amendment Bill 2024 (Cth)	Legislation
Spam Act 2003	Legislation

Training and Development

All employees engaged in any part of the business are bound by this legislation and are required to complete training.

Training name	Training type	Aim	Identified staff	Frequency
Privacy Policy Awareness Training - ELMO	Preventative	Educate staff about anti-discrimination laws	All	Induction As directed by Manager

Version Control and Revision Information

For Purpose Education reserves the right to vary, replace or terminate this policy at any time.



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
7	June 2025	Board	Updated to new template Section 1 – Purpose Section 2 – Scope – per the most recently developed policy by For Purpose Education Section 3 – Definitions - developed content from the OAIC website content Section 4 – Principles - developed content from the OAIC website content Section 5 – Responsibilities – updated content Section 6 – References – new section added Section 7 – Training – proposed content
8	July 2026	CEO	Administrative Updates: Updated to new template with business name change to For Purpose Education. Updated contact details throughout the policy aligned to new business name.