	SRA Privacy Policy
	Version: 3.4
Department: Quality & Compliance	Last Review Date: 20/2/15

Sarina Russo Apprenticeships (SRA) is committed to protecting the privacy of Your *Information* and/or *sensitive information* as defined under the *Privacy Act 1988* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (“**Your Information**”). This policy sets out the way we handle Your Information including the collection, use, disclosure and storage of Your Information, as well as your right to access Your Information. All information has been collected by SRA in accordance with the Australian Privacy Principles and will only be disclosed in accordance with these Principles.

This policy only applies to SRA’s databases and files and does not cover any State, Territory or Commonwealth Government-owned database or files. You are advised to contact the relevant government agency for a copy of their privacy policy. Further details on collection, use and disclosure of information is contained in your Training Contract Declaration.

If we change this Privacy Policy, we will post the changes on our website so you may be aware of the information we collect and how we use it. Accordingly, you are reminded to check our website for further details.

Your Information

Sarina Russo Apprenticeships is contracted to the Commonwealth Government to provide Australia Apprenticeship Support Network Services. We only collect Your Information when it is reasonably necessary for our functions and activities in providing these services. We may collect information about you in a number of circumstances and the information we collect will depend on the services we are providing to you. These services include providing ongoing support, assistance, information and advice to employers and Australian Apprentices, conducting sign-ups, the completion and registration of the Training Contract between employers and Australian Apprentices, assisting with incentives, eligibility criteria and claims, providing advice on employment options, training packages/qualifications and delivery options and administering the Australian Apprenticeship Incentives Program.

In order to provide you Australia Apprenticeship Support Network Services, we may need to collect Your Information such as name, postal address, email address, telephone number, passport details, employment/business details, bank account details and other information reasonably necessary to conduct these services. We also collect personal details from the Australian Apprentice as required on your Training Contract including racial origin/citizenship, language, disability status, work and education history, qualifications. We may also require parental/guardian information (name/contact details) for those under 18 as a signatory to the Training Contract.


Collection

Where practicable SRA will endeavour to collect Your Information directly from you. In order to provide you with Australian Apprenticeship Support Network Services, we will need to collect Your Information from you such as:

- Your name
- Your contact details
- Your qualifications
- Your employment/business details
- Your passport details
- Your bank account details (for payment of incentives under the Australian Apprenticeship Incentives Program)
- Personal details as required for completion of your Training Contract (as above)
- Wage information, tax declaration, Workers Compensation payments and receipt of other Government benefits (in some circumstances for payment of incentives for Apprentices/Trainees under the Australian Apprenticeship Incentives Program).
- Health/disability information and their impact in the workplace (in some circumstances for payment of incentives for Apprentices/Trainees under the Australian Apprenticeship Incentives Program).

As a contracted service provider to the Commonwealth Government of Australia to provide Australia Apprenticeship Support Services, we may also collect Your Information from Commonwealth and State Government Departments and Agencies such as:

- The Department of Education and Training
- The Department of Immigration and Border Protection
- State and Territory Training Authorities

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At, or as soon as practicable after, SRA collects Your Information we will take reasonable steps to ensure you are made aware of:

- SRA's identity and how you can contact us;
- Your rights with regard to accessing Your Information;
- The purpose for which Your Information was collected;
- To whom we usually disclose Your Information;
- Our requirement to collect particular or further information to comply with law or our Government contractual obligations; and
- The main consequences, if any, for you if you do not provide all or part of the information we require.

If we receive unsolicited information we will determine if we could have collected this information had we solicited it ourselves. If we determined we could not, and the information is not in a Commonwealth record, we will destroy or de-identify the information.

SRA will only collect Your Information by lawful and fair means.

Use and Disclosure

We will use our best efforts to ensure Your Information remains private and is used only for the purposes you agree to.

SRA will not reveal, disclose, sell, distribute, rent, licence, share or pass Your Information to a third party, other than those that we have a binding agreement with ensuring that the third party affords Your Information similar levels of protection as we do.

In order to provide you with Australian Apprenticeship Support Network Services, we may need to disclose Your Information to third parties such as:

- The Department of Education and Training (including for monitoring and evaluation purposes)
- Department of Human Services/Centrelink
- The Department of Employment
- The Department of Immigration and Border Protection
- State and Territory Training Authorities
- Non-Government education authorities
- Registered Training Organisations
- Your Employer


For Australian Apprentices, at the end of provision of Australian Apprenticeship Support Network Services, documents created by SRA containing Your Information will be given to the Department of Education and Training. These documents will not be used without your written consent.

Further, we may use and disclose Your Information to provide you with Australian Apprenticeship Support Network Services specific to you at point of collection or for another purpose if:

- You would reasonably expect us to disclose it for that purpose;
- That purpose is directly related to the purpose specified to you at the time of collection.
- SRA reasonably believes the use is necessary to lessen or prevent a serious threat to an individual's life, health or safety or to public health or safety and it is unreasonable or impractical to obtain your consent;
- SRA has reason to suspect that unlawful activity has been, or is being engaged in, and uses the information as part of its investigation, or in reporting its concerns to the relevant authority;
- The use and disclosure is specifically authorised by law; or
- And other exceptions provided in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

SRA does not disclose Your Information to unrelated third parties for the purposes of direct marketing unrelated products or services.

Data Quality

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SRA will take reasonable steps to ensure that Your Information is accurate, up-to-date, complete and relevant. You are encouraged to help us keep Your Information accurate, complete and up-to-date by contacting your consultant or this organisation and inform us of any changes to your details. You can contact us on 1300 178 776.

Data Security

At SRA we are committed to protecting the privacy of Your Information. We take reasonable steps to protect Your Information from misuse, loss, interference and from unauthorised access, modification or disclosure. We ensure this by having such security measures as:

- Individual password access to systems and databases
- Secure file cabinets / security access to SRA administration processing centres
- Secure processes for any Your Information carried externally e.g. in motor vehicles

All staff confirm their acceptance of the Electronic Use and Security Policy.

We will also take reasonable steps to destroy or permanently de-identify Your Information if it is no longer required for any purpose unless it is contained in a Commonwealth record or required by law.

Access and Correction

You will be provided the opportunity to access Your Information and correct that information if you determine it is incorrect. SRA will allow any person on whom records are maintained to have access to those records unless our Government contractual requirements or legislation (e.g. Freedom of Information Act) requires or authorises the refusal of access. To obtain access to Your Information please make a request to your closest SRA office. Before giving access to information, SRA will require that you provide proof of identification and this along with details of your request will be recorded on your file.

Anonymity and Pseudonymity

Whenever it is lawful or practicable, you will have an option of not identifying yourself when dealing with SRA. Due to the nature of the services being provided to you this will be very limited cases.

Sensitive Information


SRA will not collect *sensitive information* revealing your racial or ethnical origin, political opinions, religious or philosophical beliefs, trade-union membership or details of health, disability or sexual activity or orientation unless:

- Your consent has been obtained and the information is reasonably necessary to provide you with Australian Apprenticeship Support Services; or
- The collection is required or authorised by law; or
- The collection is necessary to prevent or lessen a serious threat to the life, health or safety of any individual, or to public health or safety and it is unreasonable or impractical to obtain your consent; ; or
- SRA has reason to suspect that unlawful activity, or misconduct of a serious nature, relating to our functions/activities has been, or is being engaged in and we believe this collection is necessary for us to take action in relation to this matter.
- And other exceptions provided in the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Resolving Privacy Concerns

You are able to raise any concerns you may have regarding Your Information handling practices by detailing your concerns with the Legal Counsel or Privacy Co-ordinator at Sarina Russo Group Head Office through privacy@sarinarusso.com.au.

Storing and Transferring information about you abroad

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Your Information will not be housed in an offshore data management system or transferred outside Australia.

The Internet and Your Privacy

SRA uses the World Wide Web in order to assist you in providing Australian Apprenticeship Support Services. The following statement outlines how in the context of our website your information is protected and recorded. By using the site you consent to the uses and disclosures outlined previously in this privacy policy.

Security

SRA takes all reasonable steps to protect your security when using the site but you should be aware that no transmission of information to and from a website is ever totally secure.

Whilst we strive to ensure Your Information transmitted to or from our website is secure and protected from unauthorised access, we cannot fully guarantee the security of your information. Transmission is at your own risk.

It is important to remember that if you are using a computer in a public place, such as a library or community centre, you must remember to log-off, otherwise others may be able to access Your Information.

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