

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

### PRIVACY POLICY

#### **Overview:**

The Melbourne Steiner Seminar (MRSS) recognises the importance of protecting the privacy and the rights of all individuals in relation to their personal information. This document is our Privacy Policy, outlining how we collect and manage your personal information. We respect your rights to privacy under the *Privacy Act 1988* and we comply with all of the Act's requirements in respect to collection, management and disclosure of your personal information.

#### **Consideration of personal Information privacy**

Open and transparent management of personal information:

MRSS is committed to ensure that all matters concerning Privacy are handled in an open and transparent way. MRSS reviews and updates its Privacy Policy regularly to take into account new laws and changes to the Australian Privacy Principles.

MRSS publishes its regularly updated Privacy Policy on its website. Where required a hardcopy or a copy in a particular form will be supplied free of charge.

#### **The MRSS Privacy Policy contains information on:**

- a) The type of personal information MRSS holds
- b) How MRSS collects and holds solicited personal information
- c) How MRSS deals with unsolicited information
- d) The purposes for which MRSS collects, holds, uses and discloses personal information
- e) The use of your personal information in direct marketing
- f) Disclosure of personal information to overseas recipients
- g) Adoption, use or disclosure of government related identifiers
- h) Quality of personal information
- i) Security of personal Information
- j) Access to Personal information
- k) Exception to Access
- l) Use and Disclosure of Personal Information
- m) Disclosure of Personal Information

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

- n) How an individual may complain about a breach of the Australian Privacy Principles and how MRSS deals with such a complaint
- o) Correction of personal information if necessary seek correction of such information

### **Anonymity and pseudonymity:**

Individuals have the option of not identifying themselves, or of using a pseudonym, when dealing with a matter concerning the privacy policy. However, this does not apply if:

- a) There is a requirement by the Australian Law, a court or tribunal order to deal with individuals who have identified themselves
- b) It is impracticable to deal with an individual who has not identified themselves.

### **a) Type of Information collected and purpose for collection:**

The type of information MRSS collects may include but is not limited to, personal information about trainees, staff and trainers (individuals) including sensitive information.

The types of information MRSS collects include but are not limited to: names, birthdates, contact addresses, phone numbers, academic records, biographies, CVs, notes related to interviews, notes related to complaints and all requirements concerned with enrolment professional experience, tuition fee payments. In addition, VET FEE Help /VET Student Loans applications - for students enrolled in 2016 or before only.

All personal information collected of any individual directly relates to the purpose for which MRSS collects, holds, uses and discloses personal information

All personal information of trainees collected **directly** relates to supporting the trainees during their time of study at the seminar. It is required for:

- Providing services to students
- Looking after trainee's educational, social and medical well-being
- Professional Experience support
- Processing Applications for Enrolment

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

- VET FEE-HELP Assistance /VET Student Loans Applications  
Repayment of Loans under HESA for students enrolled in 2016 or before only
- Maintaining Academic, Financial and Compliance Records
- International student information is disclosed to DEEWR via the PRISMS website which is linked to the Department of Immigration and Citizenship (DIAC).
- Information required by Federal and State Governments and Laws
- Marketing where specific consent is given

### **b) Collection of Solicited Personal Information at MRSS**

MRSS will generally collect personal information about an individual through administration forms filled out, face to face meetings and interviews, and telephone calls. In some circumstances MRSS may be provided with personal information about an individual from a third party, for example a reference from another RTO.

Melbourne Rudolf Steiner Seminar ensures that solicited information:

- is collected for a purpose that is a lawful purpose, directly related to a function or activity of the college and is necessary and related to that purpose;
- shall not be collected by unlawful or unfair means;
- the individual is aware of any matters which require collection of personal information;
- the individual is notified before the information is collected or, if that is not practicable, as soon as practicable after the information is collected;
- the individual concerned is generally aware of
  - i) the purpose for which the information is being collected
  - ii) whether the collection of the information is required by law
  - iii) any person to whom, or any body or agency to which, it is the collector's usual practice to disclose personal information of the kind so collected, and (if known by the collector) any person to whom, or any body or agency to which, it is the usual practice of that first-mentioned person, body or agency to pass on that information where information is collected for a record, the information collected is relevant to that purpose and is up to date and complete; and the collection of the information does not intrude to an unreasonable extent upon the personal affairs of the individual concerned.

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

(See Informed Consent for Information Given to the Australian Government)

- Information is collected in a timely and thorough way such that it is accurate, up to date, complete and not misleading;

### **c) Dealing with unsolicited personal information**

If MRSS receives unsolicited personal information, then MRSS will, within a reasonable timeframe, determine whether this information could have been collected as solicited personal information under the Australian Privacy Principle<sup>3</sup>.

MRSS may use or disclose this personal information if it determines it could not have collected the personal information otherwise, and that the information is not contained in a Commonwealth record.

MRSS will destroy the information if it is practicable and lawful to do so as soon as practicable.

### **d) Use or disclosure of personal information**

All information collected by MRSS will be for the particular primary purpose stated above, unless the individual consents to the use or disclosure of the information; or if the individual would reasonably expect MRSS to use or disclose the information for a secondary purpose, which is directly related to the primary purpose, or required by the law; if a permitted general situation exists or a permitted health situation exists.

### **e) Direct marketing**

Sensitive personal information collected by MRSS will not be used or disclosed for the purpose of direct marketing. Exceptions may only apply to personal information, which is not sensitive, if the individual would reasonably expect MRSS to use or disclose the information for the purpose of direct marketing.

MRSS provides a simple means (via the application form for trainees or via the induction process for staff and trainees) by which the individual can request not to have any of their information, which is not sensitive (such as images samples of work), used for purposes of direct marketing.

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

In addition, MRSS's marketing coordinator seeks permission from individuals to use their image for direct marketing purposes on a case by case basis.

### **Receiving direct marketing communication from MRSS:**

If you wish not to receive any direct marketing communication from MRSS you may unsubscribe by letting us know via phone or email and you will be taken off the list of recipients immediately.

### **f) Disclosure of personal information to overseas recipients**

Where a trainee undertakes an overseas professional experience time, relevant personal information will be disclosed to the relevant school/organisation. The trainee will be fully aware of the information disclosed.

MRSS will ensure that all overseas organisations are informed and required to adhere to Australian Privacy Principles when collecting and disclosing information about trainees from MRSS.

### **g) Adoption, use or disclosure of government related identifiers**

MRSS will not adopt a government related identifier (such as a Medicare number) as its own identifier unless this is required by Australian law or court order.

MRSS will not use or disclose a government related identifier unless:

- The disclosure of the identifier is reasonably necessary for MRSS to verify the identity of the individual for the purposes of MRSS's activities and functions;
- The disclosure of the identifier is reasonably necessary for MRSS to fulfil its obligations to an agency or a state or territory authority;
- The use of the identifier is required or authorised by or under an Australian law or court order;
- A permitted general situation exists in relation to the use or disclosure of the identifier;
- MRSS reasonably believes that the use or disclosure of the identifier is reasonably necessary for one or more enforcement activities conducted by, or on behalf of, an enforcement body.

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

### **h) Quality of Personal information**

Integrity of personal information

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

### **i) Security of personal Information**

Storage of personal information:

- Secure storage arrangements including limiting access to coordinators and administrators, locked filing cabinets and computer access security are in place to protect privacy of personal information from misuse, interference and loss as well as from unauthorised use, modification or disclosure.

### **j) Access to Personal information**

- The Melbourne Rudolf Steiner Seminar ensures that individuals have access within a reasonable period after a request has been made to their own personal information at no charge.
- An individual may request in writing access to all or part of their record held by the Seminar.
- This request is given to the relevant staff on the same day and where there is an urgent request the information must be supplied within the next 3 working days.
- Where any record is found to be inaccurate a correction is made. Where an individual requests amendment of inaccurate information but the record is found to be accurate the details of the request are noted.

### **k) Exception to Access:**

MRSS is not required to give access to personal information if:

- MRSS reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

- giving access would have an unreasonable impact on the privacy of other individuals; or
- the request for access is frivolous or vexatious; or
- the information relates to existing or anticipated legal proceedings between the entity and the individual, and would not be accessible by the process of discovery in those proceedings; or
- giving access would reveal the intentions of MRSS in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- giving access would be unlawful; or
- denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- both of the following apply:
  - MRSS has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the MRSS's functions or activities has been, is being or may be engaged in;
  - giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.

If Access to the personal information is refused by MRSS, then MRSS will give written notice to the individual that sets out:

- the reasons for the refusal, unless this is unreasonable to do so
- the mechanisms available to complain about the refusal
- any other matter prescribed by the regulations

### l) Use of Personal Information

All personal information collected by the Melbourne Rudolf Steiner Seminar is only to be used for the purposes for which it was collected or other purposes allowed by the Privacy Act 1988 as below:

- the individual concerned has consented to the use of the information for that other purpose;

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

- the Chief Executive Officer of the Melbourne Rudolf Steiner Seminar believes on reasonable grounds that use of the information for that other purpose is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person;
- use of the information for that other purpose is required or authorised by or under law;
- use of the information for that other purpose is reasonably necessary for enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue; or
- the purpose for which the information is used is directly related to the purpose for which the information was obtained.

NB: Where personal information is used for enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue, the record-keeper shall include in the record containing that information a note of that use.

### **m) Disclosure of Personal Information:**

Personal Information will only be disclosed in accordance with the *Privacy Act 1988* thus where:

- (a) the individual concerned is reasonably likely to have been aware, or made aware that information of that kind is usually passed to that person, body or agency;
- (b) the individual concerned has consented to the disclosure;
- (c) the record-keeper 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;
- (d) the disclosure is required or authorised by or under law; or
- (e) 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 the public revenue.

NB: Where personal 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 the public revenue, the



# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

record-keeper shall include in the record containing that information a note of the disclosure.

NB: A person, body or agency to whom personal information is disclosed under clause 1 of this Principle shall not use or disclose the information for a purpose other than the purpose for which the information was given to the person, body or agency.

**Informed consent** for information provided to the Australian Government will be obtained in regard to Application Forms. For students enrolled in 2016 and or before, who have applied for VET FEE HELP, 'informed consent' is included in the Request for VET FEE HELP Assistance. Where the CHESN (Commonwealth Higher Education Student Support Number) was allocated prior to the submission of the Request for VET FEE HELP Assistance form the student was required to fill in the Informed Consent Form A.

### **n) Complaints in relation to Privacy and Personal Information:**

If you believe that your privacy has been breached, please contact the office [office@steinerseminar.com](mailto:office@steinerseminar.com) and provide details of the incident so that we can investigate it. If you wish to file a complaint about any of the procedures connected with this Privacy Policy and how MRSS has handled Privacy matters, you may use the MRSS Communication Policy, which also encompasses complaint or appeal forms (This policy is available on our website [www.steinerseminar.com](http://www.steinerseminar.com).)

[Communications incl complaints and appeals\communications\\_policy\\_incl\\_complaints\\_handling\\_and\\_appeals.doc](#)

[Communications incl complaints and appeals\complaint\\_or\\_appeal\\_form.docx](#)

### **o) Correction of personal information**

If MRSS holds personal information about an individual and it is satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading then MRSS will take steps that are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

# Melbourne Rudolf Steiner Seminar Ltd

A.C.N. 081 055 110 RTO 3948 VET Fee-HELP Provider: 7052

## Advanced Diploma of Rudolf Steiner Education

Course code: 10527NAT, CRICOS code 086202A

### **Notification of correction to third parties**

If MRSS corrects personal information about an individual, steps (if any) as are reasonable in the circumstances to give that notification are taken, unless it is impracticable or unlawful to do so.

### **Refusal to correct information**

If MRSS refuses to correct the personal information as requested by the individual, MRSS must 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
- the mechanisms available to complain about the refusal; and
- any other matter prescribed by the regulations.

### **Request to associate a statement**

If:

- MRSS refuses to correct the personal information as requested by the individual; and
- the individual requests the entity to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading;

Then MRSS must take such steps as are reasonable in the circumstances to associate the statement in such a way that will make the statement apparent to users of the information.

### **Dealing with requests for correction of personal information**

If a request is made for correction of personal information, then MRSS:

- must respond to the request within a reasonable period after the request has been made.
- must not charge the individual for the making of the request, for correcting the personal information or for associating the statement with the personal information (as the case may be).