

STUDENT PRIVACY AND CONFIDENTIALITY POLICY

1. PURPOSE

- 1.1. This Policy provides guidance to International Child Care College Pty Ltd (**ICCC**) employees on how the College manages student personal information in respect of an individual's right to privacy and confidentiality.

2. SCOPE

- 2.1. In this Policy, “**Company**” or “**ICCC**” refers to International Child Care College Pty Ltd.
- 2.2. This Policy applies to all employees of International Child Care College; collectively referred to as [**employees**].
- 2.3. International Child Care College Pty Ltd (ICCC) manages information and data regarding employees in accordance with privacy legislation and requirements, as per the Privacy Act 1988 and the Australian Privacy Principles.

3. MANAGEMENT OF PERSONAL INFORMATION

- 3.1. ICCC is committed to ensuring the confidentiality, security, and integrity of the personal information the College collects, uses, and discloses. When handling personal information, ICCC operates under the best practice approach of exercising caution, maintaining privacy, and to never assume consent when sharing information regarding an individual.
- 3.2. ICCC will take all reasonable steps to ensure that any personal information collected is stored securely, and will take all reasonable security measures to protect personal information from misuse, interference, inaccuracy, loss, unauthorised access, modification, or disclosure.
- 3.3. ICCC will not disclose an individual's personal information to another person or party unless:
 - The individual is reasonably likely to have been aware of the information that may be shared;
 - The individual provided written consent to the disclosure;
 - ICCC believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the wellbeing of the individual or to others; or
 - The disclosure is required or authorised by or under law.

4. RIGHT TO ACCESS AND CORRECT RECORDS

- 4.1. Students have the right to update, access, or obtain a copy of the personal information that ICCC holds about them by submitting a written request. Written requests will be responded to within 14 days of receipt.
- 4.2. There is no charge for such requests, however, ICCC may charge a fee to make a copy of items, such as a hard copy of a certificate.

5. REPORTING PRIVACY CONCERNS

- 5.1. Students may report privacy concerns as per ICCC's Consumer Protection Policy. This Policy is accessible to students and stakeholders on the ICCC website

6. STUDENT DATA AND INFORMATION

- 6.1. All information collected regarding students enrolled at the College is collected as necessary for the functions of the College and training, and for the purpose of compliance and reporting obligations of ICCC as a Registered Training Organisation (RTO).

6.2. All information, including personal details, and assessment records, outcomes, and reports, are considered confidential. Such information is securely filed within ICCC's online learning Portal and database, and only accessible to authorised staff.

7. SHARING WITH THIRD PARTIES

7.1. Information may be shared with relevant external agencies, such as the National VET Regulator or government agencies, as part of ICCC's legal and reporting obligations.

7.2. Where a student is employed by a partner organisation of ICCC, relevant personal or training information may be shared with the organisation. Students are made aware of any partnership arrangement at enrolment.

8. PRIVACY OF CHILDREN IDENTIFIED IN TRAINING

8.1. ICCC recognises the rights and privacy of all children and families. Where students are required to observe children for educational purposes, permission must be requested from the parents or guardians of the child.

8.2. Where training requires photographs of children, students and staff must be sensitive to the nature of such photography and not include any photos which may cause harm to the child. All photographs of children must have prior authorisation and consent of both the workplace supervisor and the parent/guardian.

9. DIGITAL MEDIA PRIVACY

9.1. From time to time, ICCC may organise the digital media capture of external events or activities, such as training and assessment activities, for the purpose of marketing, advertising, or updating learning and assessment materials. Persons or parties this may affect include:

- Premises owners or managers, such as an owner of a Children's service;
- ICCC employees;
- Students and their stakeholders, such as their workplace supervisor; and/or
- In some cases, children attending the services (refer to Clause 8).

9.2. In all instances, permission and consent will be requested from any relevant individuals or parties. All persons have the right to decline or withdraw consent.

10. COMPLIANCE

10.1. ICCC seeks and encourages the commitment of all employees regarding this Policy and is dedicated to ensuring that all employees are aware of and understand all elements of this Policy, and any associated policies and procedures.

10.2. Employees must comply with the requirements of this Policy. Any breach of this Policy may result in disciplinary action including, but not limited to, termination of employment.

11. REVISION HISTORY

Rev	Date	Revision Description	Name
V1	6/03/2023	Initial Policy	ICCC HR
V2	4/03/2025	Split policy for Staff Vs Students	KC