

PRIVACY POLICY

The Australian Ballet School

RESPONSIBLE: [Audit, Risk and Compliance Committee \(ARCC\)](#)

VERSION 1 APPROVED BY THE BOARD: July 2019

LATEST REVIEW DATE: March 2023 (internal review)

REVIEW DATE: July 2024 (or earlier if prescribed by legislative or organisational requirements)

DATA ACCESS LOCATION: Staff Portal, Student Portal, The Australian Ballet School website

1. PURPOSE

The purpose of this policy is to provide a framework in dealing with privacy considerations while also outlining the compliance responsibilities The Australian Ballet School (School) is required by law and as a Registered Training Organisation (RTO) to satisfy. The policy is compliant with the *Privacy Act 1988* (Cth).

In this policy, 'us' 'we' 'our' or the School, means The Australian Ballet School and related bodies corporate. The School is committed to respecting your privacy. This Privacy Policy sets out how personal information is collected, used, stored and disclosed.

By providing personal information to the School, you consent to our collection, use and disclosure of your personal information in accordance with this policy and any other arrangements that apply between us. The School may change its Privacy Policy from time to time by publishing changes to it on its website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include name, age, gender, postcode and contact details.

2. WHO DOES THIS POLICY APPLY TO

This policy applies to all members of the **School Community**. (See: Section 3. **Definitions**)

3. DEFINITIONS

School Community includes Board members, Board Committee members all Staff Members including staff of Marilyn Rowe House (MRH), students and parents/guardians/carers, Volunteers, Contractors and Consultants.

4. POLICY

4.1 What personal information do we collect?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;

- telephone number and other contact details;
- age or date of birth;
- education status;
- gender;
- nationality;
- name and contact details for your emergency contact person;
- credit card or billing information;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the services the School has provided to you or that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website indirectly through your use of our website or through other websites or accounts from which you permit us to collect information;
- information you provide to us through student surveys; or
- any other personal information that may be required in order to facilitate your dealings with us.

We may collect these types of personal information either directly from you, or from third parties. We may collect this information when you:

- register on our website or enrol in one of our classes, including completing any online enrolment form;
- attend any of our events, such as open days or functions;
- when you speak with one of our staff by telephone or in person; or
- communicate with us through correspondence, chats, email, or when you share information with us from other social applications, services or websites.

4.2 How do we use and disclose your personal information?

We may collect, hold, use and disclose your personal information for the following purposes:

- to provide class and course advice, enrol you in a class or course and to provide our educational and training services to you;
- to enable you to access and use our website;
- to operate, protect, improve and optimise our services and our website, such as to perform analytics, conduct research and for advertising and marketing;
- to send you newsletters and event invitations;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information;

- to send you marketing and promotional messages and other information that may be of interest to you;
- to comply with our legal obligations, resolve any disputes that we may have with any of our students and/or staff, and enforce our agreements with third parties; and
- if applicable, to consider your employment application or application for a contracting role.

4.3 Use of personal information for direct marketing:

The School may send you direct marketing communications and information about our services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (such as an unsubscribe link) or emailing communications@australianballetschool.com.au.

4.4 To whom do we disclose your personal information?

The School may disclose personal information for the purposes described in this privacy policy to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- professional advisers and agents;
- payment systems operators (e.g. merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

4.5 Additional information for students:

If you enrol as a student in one of our nationally recognised training programs, we will collect additional personal information about you in order to complete your enrolment or administer your course of study with us, including:

- gender;
- current height and date measured (not required for all forms or programs);
- any language or cultural diversity information (including your country of birth, details of any non-English language spoken at home and whether or not you have any Aboriginal and/or Torres Strait Islander heritage);
- details of any disabilities, impairments or long-term conditions that you may have; details of your previous educational and training history;
- international student information and documents, i.e. visa information, health insurance
- Commonwealth Government Unique Student Identifier (USI);

- VET Students Loans applicants, all specified documents that are then shared with the Department and the Australian Taxation Office <https://www.employment.gov.au/vet-student-loans> for the purpose of the student loan, including (but limited to):
 - Tax file number
 - Commonwealth Higher Education Student Support Number (CHESSN)
 - proof of citizenship i.e.: passport
- occupation (if any) and your employer's details (if applicable).

As a Registered Training Organisation (RTO), we are regulated by the Australian Skills Quality Authority (ASQA). We are required to collect, hold, use and disclose a wide range of personal and sensitive information on students who enrol in nationally recognised training programs. This information requirement is outlined in the *National Vocational Education and Training Regulator Act 2011* (Cth) and associated legislative instruments.

We are required by law to verify the identity of students who enrol in nationally recognised courses of study. Under the National Vocational Education and Training Regulator Act 2011, it is a condition of our recognition as a RTO that we properly identify students and their specific individual needs as part of the enrolment process. We are required to collect and disclose Australian Vocational Education and Training Management of Information Statistical Standard (AVETMISS) data on all individuals enrolled in nationally recognised training programs.

As a RTO, we are also required to provide your USI to the Department of Education, Skills, and Employment (the Department) or its Successor in accordance with the National VET, available at: <https://www.dewr.gov.au/about-department/resources/dewr-privacy-policy>

For more information on the Department's privacy practices, please see its privacy policy, which is available at:

<https://www.dewr.gov.au/skills-and-training/announcements/data-provision-requirements-update>

Under the *Data Provision Requirements 2020*, we are required to collect personal information about students and to disclose that personal information to the National Centre for Vocational Education Research Ltd (NCVER). NCVER, or a third party contractor acting on its behalf, may contact you in relation to undertaking a student survey, which you can opt out of completing.

The School may also disclose personal information about you to other relevant Commonwealth and State or Territory government departments and authorised agencies, including (but not limited to):

- NCVER, including for the reasons explained above;
- the national regulator for Australia's vocational education and training sector, the Australian Skills Quality Authority (ASQA);
- <https://www.employment.gov.au/>
- Education for Overseas Students (ESOS)
- Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS); and
- the higher education regulator, the Tertiary Education Quality and Standards Agency (TEQSA).

Detailed information related to the regulators' collection, use and disclosure of this information is available at:

- www.ncver.edu.au/policies/privacy;
- www.asqa.gov.au/about/accountability-and-reporting/privacy; and
- www.teqsa.gov.au/privacy.

4.6 Promotional and Media activities of the School:

As part of a student's participation in the life of the School, they may be approached from time to time to participate in media interviews, photos or filming as part of the promotional activities of the School and, where applicable, The Australian Ballet. All School media and promotional activities are overseen by the School's Marketing and Communications Department at the approval of The Director of the School (Director) and/or Executive Director, Director of Development. Students are accompanied at all times by a member of staff when participating in media or promotional activities. While editorial approval is not always guaranteed, the School works to present its activities and students in the best possible light. If a parent/guardian does not wish a student under 18 years to appear in any media activities or promotional material for the School and/or The Australian Ballet then they need to provide their request in writing and email to: ask@australianballetschool.com.au together with a photograph of the student, for identification purposes.

4.7 Additional information for employees and contractors:

The School may collect certain information from applicants applying for a position with the School, (this may include, name, contact details, working history and relevant background checks) from any recruitment consultant, previous employers and others who may be able to provide information to assist with the decision on whether or not to make an offer of employment or contract work. This Privacy Policy does not apply to acts and practices in relation to employee records of current and former employees, which are exempt from the Privacy Act.

4.8 Disclosure of personal information outside Australia:

If students participate in an international exchange program or compete or perform internationally, the School may disclose personal information outside of Australia to relevant third parties (including international educational institutes and competition organisers), located in the countries being travelled to. Reasonable steps will be taken to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

4.9 Using the School website and cookies:

The School may collect personal information about you when you use and access its website.

While browsing information is not used to identify individuals, we may record certain information about an individual's use of our website, such as which pages are visited, the time and date of visit and the internet protocol address assigned to the individual's computer.

The School may also use 'cookies' or similar tracking technologies on its website that help to track individual website usage and remember access preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the

cookie on the device to recognise the individual across different websites, services, devices and/or browsing sessions. Cookies can be disabled through your internet browser but the School websites may not work as intended for you if you do so.

The School may also use cookies to enable the collection of data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. Personal information collected by cookies will be managed in the same way as all other personal information as described in this Privacy Policy.

4.10 Security:

The School may hold your personal information in electronic and/or hard copy form. Reasonable steps are taken to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and a number of physical, administrative, personnel and technical measures to protect personal information are in place. For example, the School has implemented information security policies and appropriate technology measures (including firewalls) to protect the personal information that it holds. However, the School cannot guarantee the security of your personal information.

4.11 Links:

The School's website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, individuals are encouraged to read them before using those websites.

4.12 Accessing or correcting your personal information:

You can access the personal information we hold about you by contacting us using the contact information below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

4.13 Making a complaint:

If you think the School has breached the Privacy Act or if you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps that you can take.

4.14 Contacting The Australian Ballet School:

For further information about this Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact the School using the details set out below:

By post: The Registrar, The Australian Ballet School
 2 Kavanagh Street, Southbank Victoria, 3006
Email: ask@australianballetschool.com.au
Telephone: 03 9669 2807