



## **Australian Teachers of Dancing Ltd PRIVACY POLICY**

This Privacy Policy forms part of the ATOD QMS Quality Manual, which can be found on the ATOD Website, by clicking the below link:

[www.atod.net.au](http://www.atod.net.au)

# SHARED WHOLE OF ORGANISATION POLICIES

## 1.1 PRIVACY POLICY

### 1.1.1 Introduction

The Board of Australian Teachers of Dancing Ltd (ATOD) is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

### 1.1.2 Purpose

The purpose of this document is to provide a framework for ATOD in dealing with privacy considerations.

This statement outlines ATOD's policy on how the Company uses and manages personal information provided to or collected by it.

ATOD is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

ATOD may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to ATOD's operations and practices and to make sure it remains appropriate to the changing legal environment.

### 1.1.3 Personal Information and Collection

The type of information ATOD collects and holds includes (but is not limited to) personal information, including:

- Contact information such as residential & mailing address, email address, phone contact numbers
- Student records and results

### **Personal Information you provide**

ATOD will generally collect personal information held about an individual by way of phone calls, correspondence, enrolment and general forms, meetings etc. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

## **Personal Information provided by other people**

In some circumstances ATOD may be provided with personal information about an individual from a third party, for example where a complaint may be received about a teacher, member, studio registered with ATOD.

## **In relation to employee records**

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to ATOD's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between ATOD and employee. However, ATOD must provide access and ensure compliance with the Fair Work Act 2009.

### **1.1.4 Use of Personal Information**

ATOD will use personal information it collects from you for the primary purpose of the collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, ATOD will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere, we will still send you direct marketing information where you have consented, and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by ATOD and by the providers of our security services for security purposes. Surveillance videos are not used by ATOD for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

Videos however may be required as part of a student's assessment requirements. These videos are either uploaded to a password protected electronic student management system with limited access to trainers and administration staff or the student may submit a video through YouTube or Google drive or Drop box. These videos are protected by a link the student provides to their trainer. Once the video has been marked by the trainer it is downloaded and uploaded to the student file (password protected) or kept for 6 months post the last student in the cohort completing.

## **Job applicants, staff members and contractors**

In relation to personal information of job applicants, staff members and contractors, ATOD's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor as the case may be.

The purposes for which ATOD uses personal information of job applicants, staff members and contractors include:

- for insurance purposes
- to satisfy ATOD's legal obligations

Where ATOD receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

#### **Volunteers:**

ATOD also obtains personal information about volunteers who assist ATOD in its functions or conduct associated activities, such as to enable ATOD and the volunteers to work together.

#### **Marketing and fundraising**

ATOD treats marketing and seeking donations for the future growth and development of ATOD or for the purpose or use at ATOD events as important. Personal information held by ATOD may be disclosed to an organisation or person that assists in ATOD fundraising.

##### 1.1.5 Disclosure of Personal Information

ATOD may disclose personal information, including sensitive information, held about an individual to:

- government departments, schools, studios, educational specialists
- people providing services to ATOD
- anyone you authorise ATOD to disclose information to.

#### **Sending information overseas**

ATOD does not intend to send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied i.e. students studying overseas may have information transmitted to their mentor studio); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

*We do use overseas providers of IT services including servers and cloud services.*

##### 1.1.6 Sensitive Information

In referring to 'sensitive information', ATOD means:

“Information relating to a person’s racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual”.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

##### 1.1.7 Management and security of personal information

ATOD’s staff & employees are required to respect the confidentiality of personal information and the privacy of individuals.

ATOD has in place steps to protect the personal information ATOD holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

#### 1.1.8 Updating personal information

ATOD endeavours to ensure that the personal information it holds is accurate, complete and up to date. A person may seek to update their personal information held by ATOD by contacting [admin@atod.net.au](mailto:admin@atod.net.au) for student related personal information or the Company Secretary of the ATOD in writing or by using the members section of the ATOD website to update contact information.

The Australian Privacy Principles require ATOD not to store personal information longer than necessary.

You have the right to check what personal information ATOD holds about you.

Under the Commonwealth Privacy Act an individual has the right to obtain access to any personal information which ATOD holds about them and to advise ATOD of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information ATOD holds about you, please contact the Company Secretary in writing.

ATOD may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, ATOD may charge a fee to retrieve and copy any material. If the information sought is extensive, ATOD will advise the likely cost in advance.

#### 1.1.9 Kept Information

Vocational Education and Training students' information is required to be maintained for 30 years.

Regarding all other information under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

#### 1.1.10 Enquiries and privacy complaints

If you would like further information about the way ATOD manages the personal information it holds, please contact the Company Secretary in writing. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Company Secretary, in writing. If we then have not dealt satisfactorily with your concerns, ATOD will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting, then you can refer your complaint to the Office of the Australian Information Commissioner via: email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)