

VERSION:

1.1

CREATED ON:

19.08.2024

REVIEWED ON:

20.06.2025

NEXT REVIEW:

30.06.2026

squad**Skill360**smart
APPRENTICESHIP
■■■■■ solutions ■■■■■

POLICY

PRIVACY POLICY

SQUAD Employment & Training, Skill360 and Smart Apprenticeship Solutions are committed to providing quality services to you, and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

Application & Coverage

This policy applies to all employees employed by Squad Employment & Training, Smart Apprenticeship Solutions and Skill360, including all employees leased to a host employer.

For the purposes of this policy, the terms “the employer” and “employees” collectively refers to the three employing entities and their respective staff.

While this policy applies to all employees across Squad Employment & Training, Smart Apprenticeship Solutions and Skill360, each employing entity treats employee and student information confidentially and does not share personal details between entities unless there is a lawful reason to do so or it is directly related to the provision of services and support for that employee or student.

Personal information will only be accessed by staff within the specific organisation the employee or student is engaged with, except where sharing is necessary for administrative purposes, legal obligations, or service delivery consistent with the primary purpose of collection.

This policy replaces all previous policies, written or not.

Purpose

The employer has adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

In accordance with the Australian Privacy Principles (APPs), *the employer* protects the privacy of data and Personal Information we collect and hold by restricting access to your Personal Information to only authorised employees and representatives who need it to provide services to you.

VERSION:

1.1

CREATED ON:

19.08.2024

REVIEWED ON:

20.06.2025

NEXT REVIEW:

30.06.2026

squad**Skill360**smart
APPRENTICESHIP
■■■■■ solutions ■■■■■

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

What is Personal Information, and why do we collect it?

Personal Information is information or an opinion that identifies an individual.

The employer collects and holds personal information about you for employment, enrolment, business operations, and government statistical and reporting purposes.

Personal information collected can include:

- Your name
- Photo Identification
- Prior Qualifications
- Superannuation details
- Proof of concession
- Unique Student Identifier (USI)
- Address
- Medical History
- ABN/ACN
- Date of Birth
- Ethnicity
- Gender
- Bank Details
- Emergency Contact
- Employment History
- Special needs
- Tax File Number
- WHS Documentation

This Personal Information is obtained in many ways, including interviews, correspondence, by telephone or email, via our websites (www.squad.org.au, www.sasat.com.au, www.skill360.com.au), from media and publications, from other publicly available sources, from third parties, through job applications, training enrolments, assessments, surveys, and during the course of employment or training engagements.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information, we will, where appropriate and possible, explain to you why we are collecting it and how we plan to use it.

VERSION:

1.1

CREATED ON:

19.08.2024

REVIEWED ON:

20.06.2025

NEXT REVIEW:

30.06.2026

squad**Skill360**smart
APPRENTICESHIP
■■■■■ solutions ■■■■■

Sensitive Information

Personal information collected by *the employer* that may be regarded as 'sensitive' under the Privacy Act includes: 'Disability' and 'long-term impairment status' (health); and 'indigenous status', 'language spoken at home', 'proficiency in spoken English', 'country of birth' (implies ethnic/racial origin).

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained.
- With your consent; or where required or authorised by law.
- For a secondary purpose that is directly related to the primary purpose.

Direct Marketing

The employer conducts its marketing communications and dissemination of service information in accordance with Australian Privacy Principle 7 (Direct marketing), the Spam Act 2003 (in respect of electronic communications), and the Do Not Call Register Act 2006.

Third Parties

Where reasonable and practicable, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Disclosure of Personal Information

The employer does not disclose personal information other than for the purpose for which it was collected, or an individual has consented to a secondary purpose, or an individual would reasonably expect this (such as receiving communications about upcoming courses), or if required by law.

VERSION:

1.1

CREATED ON:

19.08.2024

REVIEWED ON:

20.06.2025

NEXT REVIEW:

30.06.2026

squad**Skill360**smart
APPRENTICESHIP
solutions

The employer may share personal information with the Commonwealth government, including the Australian Skills Quality Authority (ASQA), the Commonwealth Department with responsibility for administering the Higher Education Support Act 2003 or the Independent Tertiary Education Council Australia (ITECA). In these circumstances, *The employer* will take reasonable steps to inform and seek consent from the individuals concerned and take all reasonable steps to ensure that the recipient handles the personal information according to the APPs.

The employer will not disclose an individual's personal information to another person or organisation unless;

- The individual concerned is reasonably likely to have been aware or made aware that information of that kind;
- Is usually passed to that person or organisation;
- The individual concerned has given written consent to the disclosure;
- *The employer* believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life/health of the individual concerned or of another person;
- The disclosure is required or authorised by or under law;
- The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary, or
- Penalty, or for the protection of the public revenue.

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 employer* shall include in the record containing that information a note of the disclosure.

Any person or organisation that collects information on behalf of *The employer* or to whom personal information is disclosed as described in this procedure will be required to not use or disclose the information for a purpose other than the purpose for which the information was collected by them or supplied to them.

The employer does not sell its mailing lists to third parties for marketing purposes.

The employer does not disclose personal information to overseas recipients. While people around the world can access material published on our website, no statistical or research publications contain identifiable personal information.

VERSION:

1.1

CREATED ON:

19.08.2024

REVIEWED ON:

20.06.2025

NEXT REVIEW:

30.06.2026

squad**Skill360**smart
APPRENTICESHIP
■■■■■ solutions ■■■■■

Security of Personal Information

The employer takes all reasonable steps to protect the personal information it holds from misuse and loss, and from unauthorised access, modification or disclosure. We will not disclose, sell or pass on your personal details in any way other than the purposes stated without your consent.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify it. However, most Personal Information is or will be stored in client files, which we will keep for a minimum of seven years.

Access to your Personal Information

You may, subject to the exceptions prescribed by the Australian Privacy Principles, request access to and correction of personal information that *The employer* collects directly from individuals.

If you consider your personal information to be incorrect, incomplete, out of date or misleading, you can request that the information be amended. Where a record is found to be inaccurate, a correction will be made as soon as practical.

There is no charge for making a request to correct personal information. You have the right to access the personal information recorded at any time and provide any necessary corrections.

If your personal details change at any point during your relationship with *The employer*, please contact *The employer* administration so that your details can be amended. If you phone about your information, *The employer* will conduct a security check to validate your identity.

Written requests for access, to obtain a copy of, or correct personal information held by *The employer* should be sent to: hrhs@squad.org.au.

Requests will be answered within fourteen business days.

Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is up to date. We will take reasonable steps to ensure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate,

VERSION:

1.1

CREATED ON:

19.08.2024

REVIEWED ON:

20.06.2025

NEXT REVIEW:

30.06.2026

squad**Skill360**smart
APPRENTICESHIP
solutions

please advise us as soon as practicable so we can update our records and continue to provide quality services to you.

Information Security

The employer takes active steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure.

- Systems and internal networks are protected from unauthorised access using appropriate technologies. Most system data transferred over the internet is protected by Secure Socket Level protocol (SSL). The inherent risks associated with data transmission over the internet are, however, commonly acknowledged.
- Access to the student management system is protected through user log-on and password, and assignment of user access rights.
- Premises and data storage systems are fully secured. *The employer* practices locking workstations when working with personal information, and all paper documents containing names and addresses are destroyed through a secure document destruction service.

Complaints and Concerns

If you believe that *The employer* has breached a Privacy Principle in relation to your Personal Information, you may lodge a complaint using *The employer's* grievance handling procedures, which enables you to lodge grievances of a nonacademic nature, including grievances about handling of Personal Information and access to personal records.

Complaints or concerns about the management of personal information should be directed in writing to: hrhs@squad.org.au or ceo@squad.org.au

The employer will respond in writing within fourteen business days.

Privacy Policy Complaints and Enquiries

If you have any queries about our Privacy Policy, please contact us at:

CEO – 0478 477 128 or ceo@squad.org.au

HRHS – 1300 784 787 or hrhs@squad.org.au