

Privacy Policy

Scope

This policy is to:

- explain how Evolution Hospitality Institute/Evolution English Language Centre (Evolution) will deal with the information that Evolution may collect from staff, industry partners/employers and enrolled or intending students, either electronically or in hard copy format, including personal information and sensitive information in accordance and compliance with legislative and regulatory requirements.
- ensure that all information is collected reasonably necessary for Evolution’s business activities and only by lawful and fair means.
- ensure that Evolution manages information in an open and transparent way.

This policy applies to:

- all students (enrolled and intending students).
- all Evolution stakeholders.

Definitions

TERM	DEFINITION
Evolution	Evolution Systems for Training and Development Pty Ltd (ABN: 73 114 531 636) trading as Evolution Hospitality Institute/Evolution English Language Centre (RTO 91256) (CRICOS: 02869G)
Evolution Mobile Australia App	Evolution mobile application is a free app, available on Google Play and Apple Store; designed for: <ul style="list-style-type: none"> • registered students, staff, industry partners/employer, and job seekers. • act as a student and staff ID card; and to record attendance and timesheet. • students & staff can access internal sites and third-party sites within this mobile app. • students & staff can access social networks within the app, which includes newsfeeds, notifications, and Individual users' posts/blogs/communication which are related to college life. • industry partners/employers can use this app to post any available jobs and view applicants who applied for the job via this app. • Job seekers (this includes Evolution students and external users) to apply for jobs through the app. • Staff have access to a digital business card, which they can share their contact detail with others using a QR code.
Personal Information	means information or an opinion about an identified individual, or an individual who is reasonably identifiable: <ul style="list-style-type: none"> • whether the information or opinion is true or not; and • whether the information or opinion is recorded in a material form or not.

TERM	DEFINITION
RTO	Registered Training Organisation
Sensitive Information	information or an opinion about an individual's: racial or ethnic origin; or political opinions; or membership of a political association; or religious beliefs or affiliations; or philosophical beliefs; or membership of a professional or trade association; or membership of a trade union; or sexual orientation or practices; or criminal record; that is also Personal Information; or health information about an individual; or genetic information about an individual that is not otherwise health information; or biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or biometric templates.
Stakeholders	Any organisation or person who may be affected or thinks they may be affected by an activity.

Policy

KINDS OF INFORMATION COLLECTED

- The following types of personal information are generally collected, depending on the need for service delivery:
 - Contact details.
 - Photo(s).
 - Employment details.
 - Educational background.
 - Demographic Information.
 - Course progress and achievement information.
 - Financial billing information.
 - Communications between individuals and Evolution.
 - Information provided in the free text fields or attachment(s).
 - Internet data (including user behaviour data), IP addresses, social media profiles and custom profiles (if needed).
- The following types of sensitive information may also be collected and held:
 - Identity details.
 - Employee details & Human Resource information.
 - Complaint or issue information.
 - Disability status & other individual needs.
 - Indigenous status; and
 - Background checks (such as National Criminal Checks or Working with Children checks).
- If the Evolution receives Information from a third party other than the individual subject of the Personal Information, Evolution will consider whether it is entitled to collect the information. If the information is not need for services delivery and/or collection of the Personal Information would require consent that has not been obtained, Evolution will destroy or de-identify the Personal Information.

HOW INFORMATION IS COLLECTED

- Evolution's usual approach to collecting personal information is to collect any required information directly from the individuals concerned. This may include the use of forms (such as registration forms, enrolment forms, or service delivery records), Evolution Australia Mobile App, the use of web-based systems (such as online enquiry forms, web portals or internal operating systems), communication with, work with and supply goods or services to Evolution.
- Evolution does receive solicited and unsolicited information from third party sources in undertaking service delivery activities. This may include information from such entities as, including but not limited to:
 - Governments (Commonwealth, State or Local).
 - Australian Apprenticeships Centres.
 - Employers (and their representatives), Job Network Providers, Schools, Guardians.
 - Service providers such as credit agencies and background check providers.

PURPOSES OF INFORMATION COLLECTION

- Evolution retains a record of personal information about all individuals with whom we undertake any form of business activity. Evolution collects, holds, uses and discloses information from its clients and stakeholders for a range of purposes, including but not limited to:
 - provide services to clients.
 - manage employee and contractor teams.
 - promote products and services.
 - conduct internal business functions and activities.
 - requirements of stakeholders.
 - requirements of relevant government and admitting authorities. It may include and not limited to:
 - Governments (Commonwealth, State or Local).
 - Australian Apprenticeships Centres.
 - Employers (and their representatives), Job Network Providers, Schools, Guardians.
 - Service providers such as credit agencies and background check providers.

DISCLOSURE OF PERSONAL INFORMATION

- Personal information may be disclosed, including but not limited to:
 - for administration purposes when having Evolution course(s).
 - for contacting, locating or notifying relevant authority if there is concern about student's welfare or safety.
 - for analysing and providing better services to students and clients.
 - for internal and external surveys or research from Evolution and/or relevant government and admitting authorities.
 - for emergency situations, such as locating a missing person.
 - required by lawful order from a relevant government and admitting authorities.
 - to prevent a threat to life, health or safety of an individual or public.
 - to have further actions on unlawful or misconducted activities.

- Personal information that has been disclosed to Commonwealth and State or Territory government departments and authorised agencies and National Centre for Vocational Education Research (NCVER) for the following purposes:
 - populating authenticated VET transcripts.
 - facilitating statistics and research relating to education, including surveys and data linkage.
 - pre-populating RTO student enrolment forms.
 - understanding how the VET market operates, for policy, workforce planning and consumer information; and
 - administering VET, including program administration, regulation, monitoring and evaluation
- Evolution may disclose information held on individuals to relevant government and admitting authorities. It may include and not limited to:
 - Governments (Commonwealth, State or Local).
 - Australian Apprenticeships Centres.
 - Employers (and their representatives), Job Network Providers, Schools, Guardians; and
 - Service providers such as credit agencies and background check providers.
- If Personal Information is shared with any third party, use and disclosure of the Personal Information is strictly limited to the extent necessary to deliver the service requested by Evolution and in accordance and compliance with legislative and regulatory requirements.

RETENTION AND DESTRUCTION OF INFORMATION

- Evolution maintains a Retention and Disposal Procedure for which personal information records are kept and destroyed (refer to Records Management Policy).
- For RTO records, in the event of our organisation ceasing to operate the required personal information on record for individuals undertaking nationally recognised training with us would be transferred to a lawful regulator, as required by law.
- Evolution takes active measures to consider whether we are able to retain personal information we hold, and also to ensure the security of personal information we hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.
- Evolution data management system is backed and secured by a host company which backs up data daily, weekly and monthly.
- We destroy or de-identify personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.
- All administrators of Evolution have a unique log on for accessing.
- Access to Evolution offices and work areas is limited to our personnel only - visitors to our premises must be authorised by relevant personnel and are accompanied at all times. With regard to any information in a paper-based form, we maintain storage of records in an appropriately secure place to which only authorised individuals have access.
- Should and when Evolution change Student Management System it will take reasonable steps to ensure that data collected is secure. This will involve but not limited to the correct procedure relating to Records Management Policy.

ACCESSING AND SEEKING CORRECTION OF PERSONAL INFORMATION

- All individuals have a right to request access to their personal information held by Evolution and to request its correction at any time in accordance and compliance with legislative and regulatory requirements.
- A list of personal information on the Evolution Australia Mobile App can be edited and updated by the registered user.
- Any personal information that needs to request and enquiry to access, update or correct personal information can be directed to studentsupport@evolution.edu.au; with suitable information provided to be able to:
 - Identify the individual concerned.
 - Confirm their identity.
 - The minimum amount of personal information needed to establish an individual's identity is sought, which is generally an individual's name, date of birth, last known address and signature.
 - When meeting the requesting party in person, identification may be sighted.
 - If confirming details over a telephone conversation, questions regarding the individual's name, date of birth, last known address or service details may be confirmed before information is provided.
 - Identify the specific information that they are requesting access to and/or update in their records.
- Evolution will respond to all such inquiries within 30 days. In some circumstances, the inquiries will be declined if the identity of the individual cannot be confirmed or there is another valid reason why Evolution is unable to provide the personal information or update the personal information.

COMPLAINTS AND APPEALS

- If individuals believe that there is any possible breach of privacy, may contact Evolution @ complaint@evolution.edu.au with details of their concerns. Complaints will be made and addressed consistently with the Complaints and Appeals Policy.
- If individuals not satisfied with the response from Evolution, they can contact the Office of the Australian Information Commissioner (www.oaic.gov.au).

APPENDIX - EVOLUTION AUSTRALIA MOBILE APP PRIVACY NOTICE

Cookies and analytics

- Evolution Australia Mobile App uses session-based cookies and can track user login details and analytics of site usage, whilst the user is signed into the app on their device.
- Evolution does not share any cookies or analytics with third parties, this insight is used solely for the improvement of the app services.
- External links within Evolution Australia Mobile App, users are required to review privacy policies from third party sites to understand how cookies, related technologies and information are used.

Disclaimer

- Evolution Australia Mobile App is not affiliated with the Commonwealth of Australia or any Australian Government Body or Subsidiary.
- Evolution Systems for Training and Development Pty Ltd (ABN: 73 114 531 636) trading as Evolution Hospitality Institute/Evolution English Language Centre (RTO 91256) (CRICOS: 02869G) is a registered training organisation and a Commonwealth Register of Institutions and Courses for Overseas Students education provider
- The information contained on the Evolution Australia Mobile App is for general information purposes only. Evolution does not guarantee and accepts no legal liability whatsoever arising from or connected to, the accuracy, reliability, currency, or completeness of any material contained on the app or any linked site.
- In no event shall Evolution be liable for any special, direct, indirect, consequential, or incidental damages or any damages whatsoever, whether in an action of contract, negligence, or other torts, arising out of or in connection with the use of the Evolution Australia Mobile App or the contents of the Evolution Australia Mobile App. Evolution reserves the right to make additions, deletions, or modifications to the contents of the service(s) at any time without prior notice.
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