

## 1 PRIVACY & PERSONAL INFORMATION POLICY

### 1.1 Purpose

To ensure that Dalton Training Services meets its legal and ethical responsibilities in regard to the collection, storage and disclosure of personal information held about any of its stakeholders.

### 1.2 Definitions

<b>Document</b>	A chart, form or other written evidence that further explains or is used to implement a policy or procedure or any reference material generated by Dalton Training Services.
<b>Learner</b>	Individual being trained.
<b>Client</b>	Enterprise requiring training programs. (Usually the employer of the Learner).
<b>Stakeholder</b>	Organisation or individual who has a vested interest.
<b>Employees</b>	Permanent staff and contractors of Dalton Training Services.

### 1.3 Policy

#### 1.3.1 Principles

Dalton Training Services will comply with all legal requirement relating to the collection, storage and disclosure of personal and private information.

Dalton Training Services will ensure the confidentiality, integrity and security of all information and we will:

- a. Only collect information that is necessary.
- b. Be transparent in the way we collect information.
- c. Keep anyone affected informed about the purpose for collecting information.
- d. Collect information directly where possible.
- e. Only use and disclose information in ways that are consistent with expectations.
- f. Be open about the kind of personal information we hold.
- g. Provide access to the records we hold about a person to them upon request.
- h. Limit the amount of highly sensitive information held, where possible.
- i. Treat complaints and appeals as confidential.

### 1.3.2 Disclosure of Personal Information

Dalton Training Services will not disclose an individual's personal information to another person or organisation unless one of the following conditions applies:

- a. 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.
- b. The individual concerned has given formal consent.
- c. Dalton Training Services believes, on reasonable grounds, that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person.
- d. The disclosure is required or authorised by or under law.
- e. The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.

Any person or organisation to which personal information is disclosed as described in this policy is not permitted to use or disclose the information for a purpose other than that for which the information was supplied to them.

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, Dalton Training Services shall include in the record containing that information a note of the disclosure.

### 1.3.3 Amendment to Records

If an individual considers the personal information that Dalton Training Services holds about them to be incorrect, incomplete, out of date or misleading, they can request that the information be amended. If Dalton Training Services does not believe the information is incorrect, incomplete, out of date or misleading, it will record the person's objection with the information.

### 1.3.4 Publication

Dalton Training Services will make all learners and employees aware of the principles contained in this policy by publishing and distributing that information in suitable formats.

## 1.4 Related Policies

- a. Access, Equity & Anti-Discrimination Policy.
- b. Employee Code of Conduct.
- c. Employee Management Policy.
- d. Learner & Client Service Charter.
- e. Learner Records Policy.
- f. Record Management Policy.

## 1.5 Related Procedures

- a. Enrolment Processing Procedure.
- b. Learner Records Procedure.
- c. Learner Records Access Procedure.

## 1.6 Supporting Documents

- a. Learner Enrolment Form.