
Alberta Employment and Immigration

Industry Training Tracking System (ITTS)

Privacy Impact Assessment

FINAL REPORT

July 2009

Submitted by:
Alberta Employment and Immigration

In consultation with:
Information and Privacy Office

Government of Alberta ■

Table of Contents

Chapter 1: Description of the Industry Training Tracking System (ITTS)	1
1.1 Responsible Public Body.....	1
1.2 Responsible Business Area	1
1.3 Contact Person	2
1.4 ITTS Overview	2
1.4.1 Background.....	2
1.4.2 Current Situation	4
1.4.3 ITTS Project	4
1.5 ITTS Benefits	4
1.6 ITTS Implementation.....	6
Chapter 2: Personal Information Collected, Used and Disclosed by the Industry Training Tracking System (ITTS)	7
2.1 Personal Information Involved.....	7
2.2 Personal Information Flow.....	10
2.2.1 Information Flow Narrative	10
2.3 Information Users.....	11
2.3.1 ITTS Administrator	12
2.3.2 Accrediting Body	12
2.3.3 Training Provider Administrator/Training Provider	12
2.3.4 Student/worker.....	13
Chapter 3: Protection of Personal Information Analysis.....	14
3.1 Collection of Personal Information	14
3.2 Manner of Collection of Personal Information	14
3.2.1 Uploading of current completed accredited training courses	14
3.2.2 Attendance/Completion of HSAN Endorsed Training.....	14
3.3 Accuracy and Retention	15
3.4 Right to Request Correction of Personal Information.....	15
3.5 Protection of Personal Information	15
3.5.1 Control and Custody	15
3.5.2 System Security.....	16
3.6 Use of Personal Information.....	16
3.7 Disclosure of Personal Information	17
3.8 Disclosure for Research or Statistical Purposes	17
Chapter 4: Potential Privacy Impacts.....	18
4.1 Mitigation of Potential Privacy Impacts.....	18
4.2 Conclusion	19
Appendix 1: Memorandum of Agreement between AE&I and HSAN.....	20

Appendix 2: Employer Consent Forms20

Appendix 3: Student Inf. Form – before ITTS goes live20

Appendix 4: Declaration Form – before ITTS goes live.....20

Appendix 5: Student Inf. Form – after ITTS goes live20

Appendix 6: Declaration Form – after ITTS goes live.....20

Appendix 7: Privacy Notice - Student/worker20

Appendix 8: HSAN Accrediting Body Guidelines20

Chapter 1: Description of the Industry Training Tracking System (ITTS)

Alberta Employment and Immigration (AE&I) in partnership with Health and Safety Association Network (HSAN) is developing the Industry Training Tracking System (ITTS) to implement a web-based system to register all Health and Safety training endorsed by HSAN and completed by the student/worker.

The development of the ITTS would create a Provincial Registry under the control and custody of AE&I, of all HSAN endorsed Health and Safety training, and all HSAN endorsed Health and Safety training completed by a student/worker that would be accessible and secured appropriately.

The system will create a unique ID for each student/worker and populate the completion of a HSAN endorsed training course. The student/worker's training credentials will be accessible to the student/worker, HSAN approved accrediting bodies and training providers. Access to the student/worker's training credentials by the public (e.g. employer, labour provider) will only be permitted if the student/worker agrees to their access by providing them an access code.

This new initiative provided the opportunity to complete a Privacy Impact Assessment.

1.1 Responsible Public Body

Alberta Employment and Immigration is the public body responsible for this project.

1.2 Responsible Business Area

Occupational Health and Safety Branch is the responsible business area. The Assistant Deputy Minister of Workplace Standards Division is the project sponsor.

1.3 Contact Person

The following individual can answer questions about the personal information collected, used and disclosed by the Industry Training Tracking System (ITTS):

Effective Practices Specialist
Occupational Health and Safety
Alberta Employment and Immigration
8th Floor Labour Building
10808 – 99 Avenue
Edmonton, AB T5K 0G5
Tel. 780-422-8188

1.4 ITTS Overview

1.4.1 Background

This project is a collaborative effort between AE&I and HSAN. One of AE&I's major responsibilities is to contribute to workplaces that are safe, healthy, fair, and stable for workers and employers.

In supporting this responsibility, AE&I's Occupational Health and Safety Branch has seen the need for assistance in tracking workers' health and safety related training for both workers and employers, and the need to provide this information quickly and easily.

There is also Occupational Health and Safety (OHS) legislation supporting this responsibility. This legislation includes the *Occupational Health and Safety Act*, the *Occupational Health and Safety Regulation* and the *Occupational Health and Safety Code*.

Through the Occupational Health and Safety Branch, AE&I is working with Industry to promote workplace health and safety. One method, to that end, is to support the delivery and administration of tracking relevant, appropriate and required industry health and safety training on behalf of workers, employers and training organizations.

The Health and Safety Association Network (HSAN) works as a voluntary group of provincial organizations with a shared interest in:

- Promoting awareness of health and safety;
- Improving information sharing, and;
- Collaboratively producing workplace health and safety training standards.

To this end, the HSAN works with member organizations to develop joint strategies to move forward with these initiatives.

HSAN has a membership comprised of health and safety associations, owner/employer groups, and labour groups. The HSAN has a mandate, in partnership with industry, to set standards for industry health and safety training across Alberta. HSAN is responsible for the process of setting standards, accrediting health and safety training programs and overall quality assurance.

The HSAN works to do the following:

- Facilitate open discussion that balances the common interests of all the groups;
- Recognize the unique needs of individual industry sectors;
- Avoid duplication of effort among participating organizations;
- Share products among participating organizations to allow customization by industry sectors;
- Endorse agreed upon training providers;
- Promote recognition of existing workplace health and safety training;
- Promote standardization of health and safety training programs;
- Develop HSAN training standards based on the OHS Act Regulations and Code that will promote mobility of workers across industries in Alberta;
- Continually maintain the integrity of the standards as set out by HSAN;
- Ensure each member of HSAN has some type of accreditation process to accredit training providers against the agreed standard – all members of the network will need to understand each other's accreditation process and examine how well it fits with their own; and
- Ensure HSAN members will accredit training providers against the agreed standard.

As much of HSAN is focused on health and safety training, a mechanism to track relevant, appropriate, and required health and safety training will be extremely beneficial. Training tracking will allow employers to recognize existing worker training, as well as promote mobility of workers across industries in Alberta, as it will allow new employers to view previous accredited training programs completed by new workers through an access code provided by the worker. This mechanism will help employers meet their need for skilled workers.

The project also furthers the OHS branch *operational plan* role to:

- Support the continuous improvement of AE&I's workplace programs through the development of effective practices, evaluation and measurement, auditing, program design and project management.

And *operational plan* activities to:

- Facilitate processes to establish criteria for targeted OHS programs.

- Research and develop best practices for AE&I employment standards and workplace health and safety programs.
- Develop measurement approaches to measure changes in workplace health and safety over time.

1.4.2 Current Situation

AE&I has contracted with an IT Vendor to develop, maintain, host and support the ITTS.

AE&I has entered into a Memorandum of Agreement for Services with HSAN. Refer to *Appendix 1* which outlines AE&I's and HSAN's responsibilities.

1.4.3 ITTS Project

Develop a Health and Safety training tracking capability to provide a single-window access point for provincial accreditation bodies, training providers, students/workers, employers/labour providers and AE&I authorized users.

The tracking system shall enable processes that culminate in:

- Enhanced quality of training
- Enhanced safety in the workplace
- Increased flow of information on completed accredited training
- Reduction of costs and time delays for re-training (due to incomplete records)
- Sharable record keeping for authorized partners

1.5 ITTS Benefits

A centralized health and safety training registry has the potential to provide a more coordinated approach along with improved access to existing information. It would create a one-stop information source for accreditation bodies, trainers, students/workers, employers/labour providers and AE&I, thereby simplifying the training process and providing stakeholders with a complete picture of accredited training opportunities and completed training.

A key business objective of Industry is to increase worker safety, avoid the high cost of unnecessary duplicate Health and Safety training in the workforce, improve the portability of workers by tracking the approved training the worker has successfully completed, and making that information available to perspective employers through an access code provided by the worker.

The implementation of the project to standardize, approve, and track student/worker's Health and Safety training will provide many benefits to stakeholders including:

Industry:

- Approved Health and Safety training programs that offer industry recognized credentials will attract and retain workers.
- Workers will have more appropriate Health and Safety training.
- Will lead to a pool of workers with accredited, portable Health and Safety training.

Organizations:

- Will have trained and skilled workers with quality Health and Safety training leading to reduced incidents, increased productivity, increased client satisfaction.
- Increased worker satisfaction, loyalty, motivation, reduced absences.
- Will save costs in duplicating training or re-training new workers.
- Well trained workers are more capable of identifying potential problems.
- Corporate commitment to Health and Safety training will make organizations more competitive.

Student/worker:

- Industry-wide approved Health and Safety training will lead to more employment opportunities.
- Easier transition for workers because they can go to work right away.
- Lower incidents.
- Do not have to retrain for a new employer.
- Do not have to carry with them training certificates.

AE&I and HSAN:

- Better non-identifying research data for auditing and quality management.
- Better non-identifying research data on outcomes of Health and Safety training programs.
- Better non-identifying research data for targeting improvements.

Alberta needs to be able to attract workers to the province, have a competitive and sustainable economy, and ensure a fair, safe and healthy work environment; a workplace registry of health & safety training would be a useful tool to support this.

A key business objective of AE&I is to ensure quality Health and Safety training is available to students/workers.

1.6 ITTS Implementation

The First Phase of the Project is expected to be implemented August – September 2009. This phase will provide access to the ITTS by HSAN accrediting bodies, training providers, students/workers and Government of Alberta representatives.

The Second Phase of the Project is expected to be implemented in fiscal 2010-11, but that will be dependent on sourcing suitable budget funding. The second phase is expected to streamline and provide additional means of ITTS data entry (e.g. enhanced data entry screens and allowance for web services), enhance employer access to the system to conduct worker training inquiry, provide the Audit record keeping functions, and implement the Archiving and Purging functions based on the Records Retention Schedule.

Chapter 2: Personal Information Collected, Used and Disclosed by the Industry Training Tracking System (ITTS)

2.1 Personal Information Involved

Figure 1 outlines the personal information to be collected (before the ITTS goes live) by an employer/labour provider through consent.

This information is used to provide the worker's current completed courses to the ITTS which will be uploaded when the development of the ITTS has been completed. The employer/labour provider will have a paper form that can be completed by the worker or an employer/labour provider may provide the worker the opportunity to provide consent electronically through their web site. (Refer to forms in *Appendix 2*).

The upload of this information is a one time operation.

Figure 1

Personal Information Collected by an Employer/Labour Provider for ITTS

Personal Information	Rationale
First Name	Identification
Last Name	Identification
Date of Birth	Identification
Personal Information (OPTIONAL)	Rationale
Middle Name	Identification if required
Email address	Notification when information has been uploaded
Address	If unique identification is required

Figure 2 outlines the personal information to be collected (before the ITTS goes live) by a Training Provider.

This information will be used to create a student/worker’s unique ID and populate the ITTS with the personal information and course completion. If the student/worker provides an email address a notice will automatically be sent to the student/worker providing the link to the ITTS when it goes live. (Refer to *Appendix 3 and 4*).

Figure 2

Personal Information Collected by a Training Provider’s Student Information Form Before ITTS goes Live

Personal Information	Rationale
First Name	Identification
Last Name	Identification
Date of Birth	Identification
Personal Information (OPTIONAL)	Rationale
Middle Name	Identification if required
Email address	Notification when the ITTS goes live
Address	Identification

Figure 3 outlines the personal information collected by a Training Provider at the time of training after the ITTS goes live. This information is used to create a student/worker’s unique ID and populate the ITTS with the personal information and course completion. (Refer to *Appendix 5*).

Figure 3

Personal Information Collected by a Training Provider’s Student Information Form

Personal Information	Rationale
First Name	Identification
Last Name	Identification
Date of Birth	Identification
Currently Registered on ITTS (yes, no,	Identification

don't know)	
If yes, ITTS Worker ID number	Identification
Personal Information (OPTIONAL)	Rationale
Middle Name	Identification if required
Email address	Notification when information has been uploaded
Address	Identification

Figure 4 outlines the personal information collected by the ITTS when a student/worker sets up their account.

Figure 4

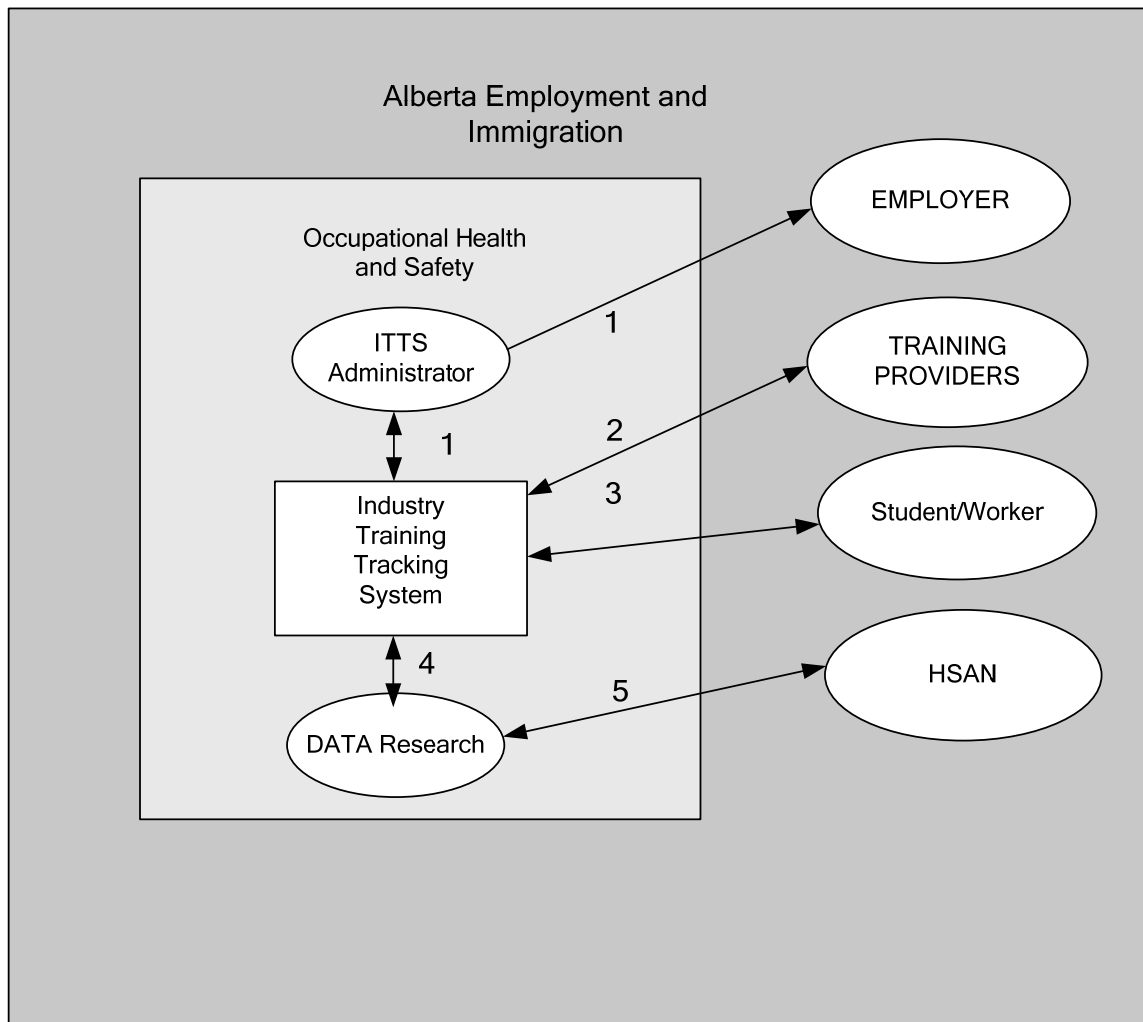
ITTS Login

Personal Information	Rationale
Username	Identification
Password	Identification
Security Questions	Security
Personal Information (OPTIONAL)	Rationale
Industry Sector	Analysis
Region of Alberta working in	Analysis

2.2 Personal Information Flow

Figure 5 is a highly simplified diagram of the information flows for the ITTS. Section 2.2.1 is a narrative of these flows.

Figure 5
 Industry Training Tracking System
 ITTS



2.2.1 Information Flow Narrative

1. The employer provides a worker with the information/consent form (*Appendix 2*) to authorize the employer to provide the ITTS the worker's personal information and current completed courses (Figure 1).

The information will be provided in an excel spreadsheet and the data is migrated into the ITTS by an accrediting body or training provider.

Once the ITTS has been developed and operational, the information will be uploaded. The upload is a one time operation.

2. Training Providers are required to collect personal information from the student/worker attending their courses. Refer to the 'Student Information Form' (*Appendix 3 and 5*). The personal information is uploaded into the ITTS (Figure 2 and 4).

The Training Providers will use the personal information to create a unique ID for the student/worker in the ITTS and populate the student/worker's completion of the HSAN endorsed course (training credentials) with the student/worker's authorization. (Refer to *Appendix 4 and 6*).

Training credentials are accessible to HSAN approved Accrediting Bodies and Training Providers for only those courses offered by the Accrediting Body/Training Provider.

3. The student/worker can access the ITTS website through their unique ID (set up by the Training Provider) and then create their ITTS Access Account. The student/worker will be required to read and acknowledge the ITTS Privacy Notice & Terms and Conditions (refer to *Appendix 7*) before setting up their unique username and password. Answers to security questions are recorded to secure future access.

The student/worker can self update some of their personal information on the ITTS. In addition, the student/worker can request in writing at any time, to have their account be flagged inactive, rendering it inaccessible

4. AE&I authorized users will access the system to generate reports (non-identifying data), manage the legislated training standards (eg. first aid) and the approved training agencies
5. Non-identifying data may be shared with HSAN.

2.3 Information Users

Workers must have an ITTS Access Account and Named Users a User Account (in the case of other users) created for them before they are able to login and use the ITTS.

Named Users include Administrators, Accrediting Body Users, Training Provider Administrators, and Training Provider Users.

The ITTS provides help text and FAQs that can be accessed by all users from a link available in all the ITTS pages after the user logs in.

2.3.1 ITTS Administrator

An ITTS Administrator is a named user with full access to the ITTS. The ITTS Administrator is required for security, administration and control process of the ITTS. The ITTS Administrators are the HSAN administrators or AE&I employees.

AE&I has contracted an IT Vendor who will provide application maintenance and support. ITTS administrators from HSAN (and to a lesser extent AE&I) will provide support to all users and ensure that data integrity is maintained, look-up table values are updated and new enhancements or upgrades are tested on the system prior to release.

Access to all functions of the system is required to provide appropriate support and maintenance. To control deletions of any records, only ITTS Administrators have access to eliminate records in the databases.

2.3.2 Accrediting Body

An Accrediting Body is an organization that HSAN authorizes to administer a particular Training Standard(s), and accredited Training Providers and Courses.

2.3.3 Training Provider Administrator/Training Provider

A Training Provider Administrator is a named user on the ITTS. The Training Provider Administrator sets up Training Provider Users (within the Training Provider organization) accounts on the ITTS. The Training Provider Administrators and the Training Provider Users represent their organization that offers HSAN accredited courses.

With the consent of the student/worker the Training Providers will use the student/worker's personal information to create a unique ID for the student/worker in the ITTS and populate the student/worker's completion of the HSAN endorsed course (training credentials). The Training Provider is responsible to ensure they have verified the identity of the student/worker by viewing the student/worker's government issued identification.

Training credentials are accessible to HSAN approved Accrediting Bodies and Training Providers for only those courses offered by the Accrediting Body/Training Provider.

2.3.4 Student/worker

Once a student/worker has taken a HSAN endorsed course(s), accessed the ITTS through their unique ID and created their ITTS Access Account, they can create a View Access Code. This View Access Code can be provided for example to an employer, labour provider, or other party by the student/worker which will allow that party access to their training credentials. The student/worker can deactivate this access code at any time by changing it to a new value and not re-providing it to previous holders of this code.

Chapter 3: Protection of Personal Information Analysis

3.1 Collection of Personal Information

Section 8 of the *Government Organization Act* allows a Minister to establish any services he/she considers desirable in order to carry out the matters under his/her administration. This section is broad enough to include the creation and operation of the Industry Training Tracking System (ITTS), which is part of the efficient running of any government department.

Personal information collected for the ITTS is done under the authority of section 33(c) of the *Freedom of Information and Protection of Privacy Act (FOIP Act)*.

33 *No personal information may be collected by or for a public body unless*

(c) that information relates directly to and is necessary for an operating program or activity of the public body.

Personal information collected is used to populate a centralized health and safety training registry, the ITTS.

3.2 Manner of Collection of Personal Information

Section 34(1) of the *FOIP Act* establishes direct collection as the primary method for obtaining personal information. Personal information required to create and operate the ITTS is provided directly by the student/worker the information is about through consent and declaration.

There are currently two stages to the process.

3.2.1 Uploading of current completed accredited training courses

In order to upload current completed courses once the ITTS has been developed, the worker signs a consent form (refer to *Appendix 2*) authorizing their employer to provide the course information to the ITTS on their behalf. This is a one time upload.

3.2.2 Attendance/Completion of HSAN Endorsed Training

At the time of training the Training Provider explains the creation of the student/worker's unique ID and the recording of the completion of the course and has the student/worker fill out the Student Information Form (refer to *Appendix 3 and 5*). The student/worker reads and signs the authorization/declaration (refer to *Appendix 4 and 6*).

3.3 Accuracy and Retention

Information is collected directly from the student/worker. When a student/worker takes a course from the HSAN approved service provider, the Training Provider requires a student/worker to show a government issued identification for the verification of their identity.

The records maintained in the ITTS will be retained in accordance with the retention and dispositions schedules under the *Administrative Records Disposition Authority*. These schedules are currently being finalized.

3.4 Right to Request Correction of Personal Information

There is an established process to deal with requests to correct personal information. If a student/worker believe that the information about them is inaccurate (in error or something omitted), they have the right to ask that the information be corrected. The student/worker's training provider is the initial contact for such a request.

Under section 36 of the *FOIP Act*, individuals have the right to request corrections of their personal information. If an individual is dissatisfied with the responses to their request for correction, a formal request for correction under the *FOIP Act* can be made through the Information and Privacy Office.

3.5 Protection of Personal Information

3.5.1 Control and Custody

Alberta Employment and Immigration (AE&I) in partnership with the Health and Safety Association Network (HSAN) is developing the ITTS to implement a web-based system to register all Health and Safety training endorsed by HSAN and completed by students/workers.

AE&I have entered into a Memorandum of Agreement For Services with HSAN (refer to *Appendix 1*).

The development of the ITTS will create a Provincial Registry under the control and custody of AE&I, of all HSAN endorsed Health and Safety training, and all HSAN endorsed Health and Safety training completed by students/workers. The collection, use and disclosure of personal information is subject to the *FOIP Act*.

The personal information handled by the ITTS is considered to belong to the student/worker it is about. Protection of personal information is a joint Department, Branch, individual staff and HSAN responsibility.

HSAN has “Accrediting Body Guidelines” in place. This document is a guide for HSAN Full Members to submit an application to HSAN for recognition as an Accrediting Body. The document includes the application form, Memorandum of Understanding and an Accrediting Body Privacy Agreement sign off (refer to *Appendix 8*).

3.5.2 System Security

AE&I's security arrangements are guided by the department's Privacy Policy and Security Policy. The two policies ensure common privacy expectations across the Department. They are the foundation for Department-wide processes, detailed procedures and practices at the program and service level, and individual awareness.

In addition all Government of Alberta IT applications now require an Information Risk Assessment (IRA). The IRA will be completed by an external vendor with input from the business members. The IRA is a 3 part process.

Currently AE&I's Information Management and Application Support Division, with participation from HSAN, will be completing the first part of the IRA – Business Impact Assessment. It is anticipated that the IRA will be completed by August 21, 2009.

The ITTS employs an audit trail that monitors access to information by the user ID and the date of additions, deletions and/or modifications to data.

3.6 Use of Personal Information

The system will create a unique ID for each student/worker and populate the completion of an HSAN endorsed training course(s). The student/worker's training credentials will be accessible to HSAN approved Accrediting Bodies, Training Providers (for only those courses offered by the Accrediting Body/Training Provider) and student/workers.

Once a student/worker has taken a HSAN endorsed course(s), accessed the ITTS through their unique ID and created their ITTS Access Account, they can create a View Access Code. This View Access Code can be provided for example to an employer, labour provider, or other party by the student/worker which will allow that party access to their training credentials. The student/worker can deactivate this access code at any time by changing it to a new value and not re-providing it to previous holders of this code.

3.7 Disclosure of Personal Information

Section 40(1)(c) & (d) of the *Freedom of Information and Protection of Privacy Act* enables AE&I to exchange personal information with outside agencies to assist in the Health and Safety training of student/worker's and the tracking of the student/worker's Health and Safety courses.

3.8 Disclosure for Research or Statistical Purposes

Current AE&I practice is that disclosures for research or statistical purposes must be approved by the Assistant Deputy Minister responsible for the business area that manages the information. Any release of personal information will be in compliance with this policy.

The Department's Evaluation and Analysis Advisory Committee reviews requests to the Department from external researchers to undertake evaluation using Department information or resources and makes recommendations to the respective Assistant Deputy Minister(s).

Chapter 4: Potential Privacy Impacts

4.1 Mitigation of Potential Privacy Impacts

The Industry Training Tracking System (ITTS) will record the completion of Health and Safety Association Network (HSAN) endorsed course(s) and training credential of the student/worker. Training credentials are accessible to HSAN approved Accrediting Bodies and Training Providers for only those courses offered by the Accrediting Body/Training Provider as well as the student/worker to their own information, all as authorized users of the ITTS.

Alberta Employment and Immigration (AE&I) has contracted with an IT Vendor to develop, maintain, host and support the ITTS.

AE&I has entered into a Memorandum of Agreement for Services with HSAN which outlines AE&I's and HSAN's responsibilities.

HSAN will have a Memorandum of Understanding with the Accrediting Bodies. This Memorandum of Understanding reflects the relationship that is intended to ensure that the principles of HSAN and the roles and responsibilities of both parties are clearly defined and understood. This also includes a signed Accrediting Body Privacy Agreement which includes the responsibility of the Accrediting Body to ensure all their accredited training providers and instructors have policies and processes in place to comply with the privacy requirements of the *Freedom of Information and Protection of Privacy Act* and the *Personal Information Protection Act*.

The student/worker can access the ITTS website through their unique ID (set up by the Training Provider) and then create their ITTS Access Account. The student/worker will be required to read and acknowledge the ITTS Privacy Notice & Terms and Conditions (refer to *Appendix 7*) before setting up their unique username and password. Answers to security questions are recorded to secure future access.

Once a student/worker has taken a HSAN endorsed course(s), accessed the ITTS through their unique ID and created their ITTS Access Account, they can create a View Access Code. This View Access Code can be provided for example to an employer, labour provider, or other party by the student/worker which will allow that party access to their training credentials. The student/worker can deactivate this access code at any time by changing it to a new value and not re-providing it to previous holders of this code.

In addition, the student/worker can request in writing at any time, to have their account be flagged inactive, rendering it inaccessible.

The ITTS is under the control and custody of the AE&I and in partnership with the HSAN. The personal information is collected in compliance and managed in accordance with the *Freedom of Information and Protection of Privacy Act*.

Phase 2 of the project will include the ability for an employer, who has a signed an agreement with HSAN and registered on the ITTS, to search the ITTS to determine if a worker is in the system. Only the name will be visible, the student/worker's personal information; address, contact information and training credentials will not be visible.

An addendum to this PIA will be completed on Phase 2 in relation to the access by an employer to ensure all potential privacy concerns have been addressed.

4.2 Conclusion

A centralized health and safety training registry has the potential to provide a more coordinated approach along with improved access to existing information. It would create a one-stop information source for accreditation bodies, trainers, student/workers and government, thereby simplifying the training process and providing stakeholders with a complete picture of accredited training opportunities and completed training.

A key business objective of Industry is to increase worker safety, avoid the high cost of unnecessary duplicate Health and Safety training in the workforce, improve the portability of workers by tracking the approved training the student/worker has successfully completed, and making that information available to perspective employers by the student/worker.

The implementation of the project to standardize, approve, and track student/worker's Health and Safety training will provide many benefits.

The Information and Privacy Office is comfortable that the privacy and security safeguards to be put in place for the Industry Training Tracking System will adequately protect the personal information involved.

Appendix 1: Memorandum of Agreement between AE&I and HSAN

Appendix 2: Employer Consent Forms

Appendix 3: Student Inf. Form – before ITTS goes live

Appendix 4: Declaration Form – before ITTS goes live

Appendix 5: Student Inf. Form – after ITTS goes live

Appendix 6: Declaration Form – after ITTS goes live

Appendix 7: Privacy Notice - Student/worker

Appendix 8: HSAN Accrediting Body Guidelines