



# RTO Privacy and Data Protection Procedure

AMS-AUS-PR-03-35

## Scope

The purpose of this procedure is to detail Altrad Services' practices on the use and handling of personal and sensitive information, including the collection, retention and storage of an individual's data and to provide staff and other individuals with a better understanding of the personal information Altrad Services holds on record relating to its RTO operations.

This procedure relates to:

- The following Standards for Registered Training Organisations (RTOs) 2015: 3.4, 3.5 d) and 8.5
- The Privacy Act 1998
- The Australian Privacy Principles (APPs)
- Student Identifiers Act 2014
- National Vocational Education and Training Regulator Act 2011

## Process Map

Not Required

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## Procedure

### Definitions

For the purpose of this procedure, the following definitions apply:

**AVETMISS** Australian Vocation Education and Training Management Information Statistical Standards.

**Altrad Services** means Cape Australia Holding Pty Ltd, TOID 7131, as defined on the National Register.

**CEO** means the Chief Executive Officer listed as the responsible person for the RTO on the National Register and with ASQA.

**NVR Registered Training Organisation** as defined under the National Vocational Education and Training Regulator Act 2011, means a training organisation that is registered by the National VET Regulator as a registered training organisation.

**Personal Information** as defined under the Privacy Act 1988, means information or an opinion about an identified individual, or an individual who is reasonably indefinable:

- Whether the information or opinion is true or not; and
- Whether the information or opinion is recorded in a material form or not

**Sensitive Information** as defined under the Privacy Act 1988, means:

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- Racial or ethnic origin; or
- Political opinions; or
- Membership or a political association; 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

## Process Stages

### Collection on Information

1. Altrad Services recognises the importance of protecting an individual's right to privacy. Altrad Services is committed to ensuring the confidentiality and security of the information that is collected.
2. The Privacy Act 1998 requires companies to comply with the Australian Privacy Principles. Altrad Services is committed to the Australian Privacy Legislation in the way it collects, uses, secures and discloses personal information.
3. Altrad Services only collects personal and sensitive information by fair and lawful means and not in an unreasonably intrusive manner. Altrad Services only collects personal information in order to properly and efficiently carry out its functions as an NVR Registered Training Organisation and to:
  - Establish and maintain a candidate's relationship as a customer of Altrad Services
  - Provide and administer the products and services requested from Altrad Services
  - Report to State and/or Territory Registered Bodies in relation to the training services provided by Altrad Services
4. Candidates will be responsible for the application and supply of their own USI prior to the commencement of training. If no previous application exists, or if the candidate has forgotten their USI, they will be provided with access to a computer.
5. Altrad Services uses the information collected for the purpose for which it was provided. Altrad Services will not disclose any information that we collect about our staff, candidates or clients to a third party unless we have written consent, or are otherwise required by, or authorised under law.
6. The only exclusion to this is any requirement to provide information to the VET Regulator or their agent as part of Altrad Services' requirements to demonstrate compliance with the VET Quality Framework.
7. To provide training and assessment services, Altrad Services needs to collect personal and sensitive information when a candidate enrolls into a course that Altrad Services is providing. It is a requirement that this information is reported to State / Territory registered bodies under the requirements of AVETMISS.



8. In accordance with Altrad Services' RTO Enrolment Procedure, AMS-AUS-PR-03-27, information collected via the Application for Enrolment Form, AMS-AUS-F-0566, includes, but is not limited to:
- Name
  - Address
  - Contact details
  - Date of Birth
  - Gender
  - Country of birth
  - Language spoken at home
  - Level of English spoken
  - Disability information
  - Highest secondary school information
  - Qualifications completed
  - Current employment status
  - Indigenous status
  - Unique Student Identifier (USI)
9. There is no obligation for an individual to provide personal information, however Altrad Services may not be able to provide the services required without this information.

### **Use of Internet/Transfer of Data**

10. Altrad Services may use the internet to transmit personal information from delivery sites to other sites within the organisation and to transmit details to state registering bodies.
- State and territory registering bodies manage the security of data transmitted to them
  - Altrad Services will take all reasonable steps to protect the security of personal information when transmitting data via the internet, but is aware that no transmission of information by email or to a registering body's website is ever totally secure

### **Storage and Security**

11. Altrad Services will take all reasonable steps to ensure the security of personal information held from interference, unauthorised access, misuse, loss, damage or disclosure. Steps to ensure the security of data and personal information include:
- Password protection for all electronically stored records
  - Securing of paper files in locked cabinets
  - Physical access restrictions and validation of data
  - Restricted access to databases - Access to information is assigned on a need to know basis, and specific job roles within the organisation

### **Access and Seeking Correction to Personal Information**

12. Individuals have the right to access or to obtain a copy of their personal information held on file about them. Access to an individual's personal information is available on application in writing to the RTO Centre Manager. Access to personal information will be controlled at all times. Altrad Services will attempt to meet all requests for access or correction in a timely manner and without any cost to the enquirer.
13. Altrad Services endeavours to ensure that the personal information held is accurate, complete and up-to-date. If an individual believes the personal information held is inaccurate, individuals are to contact Altrad Services' Training Administration Department.
14. If Altrad Services disagrees with an individual's request, it will only do so on reasonable grounds, and we will provide the reason for refusal in writing.

### **Retention, Transfer and Destruction of Information**

15. In accordance with the RTO Records Management Procedure, AMS-AUS-PR-03-26, Altrad Services maintains all personal documentation, including training and assessment evidence, electronically.
16. As required under the National Vocation Education and Training Regulator Act 2011, in the event Altrad Services ceases to operate as an NVR Registered Training Organisation, all personal information relating to past and current students will be transferred to the Australian Skills Quality Authority (ASQA) within 30 days.

**Privacy Concerns**

17. Candidates and clients can raise any concerns they may have regarding the handling practices of personal information by either discussing concerns where the course is being delivered or by contacting Altrad Services' Training Administration Department.

**Key Related Documents**

Reference Number	Document
AMS-AUS-PR-03-26	RTO Records Management Procedure
AMS-AUS-PR-03-27	RTO Enrolment Procedure
AMS-AUS-F-0566	RTO Application for Enrolment Form