

RTO Management

R6 Privacy

Standards Evidenced	8.5
Standards Referenced	

General policy

PICAC complies with the Australian Privacy Principles and the requirements of privacy legalisation, including:

- Only collecting information with the knowledge and consent of the person;
- Only using personal information for the purposes for which it was collected;
- Not disclosing, reselling, distributing to or sharing personal information with a third party without the prior written consent of the person;
- Not disclosing personal information to state institutions or authorities except as required by law or regulation;
- Ensuring that demographic and other statistical information is not linked to any personal information that can disclose the identity of a person; and
- Using, from time to time, a person's contact details to provide them with information about its programs or activities.
- National VET Data Policy¹
- Making this policy freely available

PICAC Compliance with Australian Privacy Principles

Australian Privacy Principle 3 – Collection of solicited personal information

PICAC only collects personal information that is reasonably necessary for our business activities.

We only collect sensitive information in cases where the individual consents to the sensitive information being collected, except in cases where we are required to collect this information by law, such as outlined earlier in this policy.

All information we collect is collected only by lawful and fair means.

We only collect solicited information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner.

Australian Privacy Principle 5 – Notification of the collection of personal information

Whenever PICAC collects personal information about an individual, we take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.

Our notifications to individuals on data collection include:

¹ Endorsed by COAG Industry Skills Council November 2017

PICAC's identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters;

The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party;

If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection;

The purpose of collection, including any primary and secondary purposes;

The consequences for the individual if all or some personal information is not collected;

Other organisations or persons to which the information is usually disclosed, including naming those parties;

Whether we are likely to disclose the personal information to overseas recipients, and if so, the names of the recipients and the countries in which such recipients are located.

A link to this APP Privacy Policy on our website or explain how it may be accessed; and

Advice that this APP Privacy Policy contains information about how the individual may access and seek correction of the personal information held by us; and how to complain about a breach of the APPs, or any registered APP code, and how we will deal with such a complaint.

Where possible, we ensure that the individual confirms their understanding of these details, such as through signed declarations, website form acceptance of details or in person through questioning.

Collection from third parties

Where PICAC collects personal information from another organisation, we:

Confirm whether the other organisation has provided the relevant notice above to the individual; or

Whether the individual was otherwise aware of these details at the time of collection; and

If this has not occurred, we will undertake this notice to ensure the individual is fully informed of the information collection.

Detailed implementation of the APP as PICAC

Details of how PICAC implements each of the 13 Australian Privacy Principles is contained in [R05a Australian Privacy Principles](#) policy document

Agreement to PICAC Privacy Policy

Learners will be required to sign a privacy declaration that includes the requirements of the National VET Data Policy on enrolment and evidence of this will be retained on file.

Staff access to information

Personal information is not available to staff, except on a need to know basis. For example trainers will be given sufficient information to identify a learner, but personal private information will not be made available.

Access to data stored on the Learner Management System is password-protected. Only the CEO or their authorised delegate are authorised to give access.

PICAC website

This privacy policy will be published and kept up to date on the website

Where the PICAC website contains links to other sites, PICAC is not responsible for the accuracy or the privacy practices of such sites.

PICAC advises visitors to its website that, when they follow a link to another website from the PICAC website, they should read the privacy statements of each and every website which collects identifiable personal information.

Access to personal Information

Any person (learner, applicant or staff member) can gain access to the personal information PICAC holds about them by making a request in writing, detailing the information they seek, and by providing proof of their identity.

After reviewing this information, a person can provide, in writing, any corrections which in their view should be made to the information that PICAC holds about them.

Supporting processes

The following processes are defined to ensure these policy requirements are met:

Process Name	Purpose
R05a Australian Privacy Principles	Detailed implementation of Australian Privacy Principles
Assigning User access to SMS	Provide user access to the VETtrak SMS
Providing a copy of personal information	Release of personal information for personal review
PicPr45	Pre-Training review process

Supporting Forms and Documents

Document Identifier	Name
PicF05	Request for student information
	Confidentiality Agreement (staff)
PicF16 Consent to use personal information	Permission to use images and other identifying information for promotional or other purposes
PicFP19 Change of Personal Information	Notifying the RTO of personal data changes

Evidence

To Evidence	Source

--- End of Policy ---

Version Control

Version #	Date	Changes
1.0	27/10/17	First release
1.1	1/4/18	Renumbering to reflect moving of Complaints and Appeals