



## 1.0 Purpose

The purpose of this policy and procedure is to explain why and how Sonic HealthPlus will collect and use personal information in its processes and practices.

## 2.0 Scope

This policy and procedure is for Sonic HealthPlus, Registered Training Organisation (RTO Code 51535) and includes:

- All RTO staff
- All RTO operations
- All Vocational Education and Training (VET) students

This policy and procedure excludes students enrolling or undertaking non-accredited courses with Sonic HealthPlus.

## 3.0 Responsibilities

Student roles and responsibilities in regards to information, data, and privacy include:

- Providing accurate and complete personal information to the RTO in regards to each course enrolment
- Ensuring their personal information used for training purposes is correct and current
- Inform the RTO if personal information has changed as soon as reasonably possible
- Declaring and consenting to the RTO collecting, using, and disclosing information to others when completing their online course enrolment
- Create a USI (Unique Student Identifier) with the federal government and supply the USI to the RTO for verification
- Being aware of this policy and following the outlined procedure
- To seek assistance if they need to clarify understanding of this policy and procedure

Trainer and assessor roles and responsibilities include:

- Communicating with students regarding collection and use of personal information, as well as the requirements to hold a USI
- Complying with direction from the RTO Team regarding collection and management of personal information and student identifiers, and
- Directing students to resources to support the above

The RTO Coordinator's role and responsibilities include:

- Implementation of systems to support compliance with privacy and data use, including USIs
- Implementing quality assurance mechanisms to ensure safety of data, including USIs
- Monitor collection and use of personal information
- Validate student USI
- To ensure RTO staff made aware of any changes to legislative and regulatory requirements
- To ensure RTO staff and students are made aware of any changes to this policy and procedure

## 4.0 Definitions

<b>ASQA</b>	Australian Skills Quality Authority.
<b>Learner/Student</b>	Student/Learner/Participant is an individual who is formally enrolled to study at Sonic HealthPlus. The individual person is the person who appears on the RTOs documents such as enrolment and admission document, and who is assigned an individual student number.
<b>Notifiable Data Breach</b>	A data breach occurs when personal information that a learner/student holds is subject to unauthorised access, or disclosure, or is lost.
<b>Personal information</b>	Is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.
<b>RTO</b>	Registered Training Organisation.
<b>Trainer</b>	Is a persons who provides training in accordance with Standards for Registered Training Organisations (RTO's) 2015; Clause 1.13, 1.14 and 1.16.
<b>Training</b>	Is the process used by Sonic HealthPlus RTO 51535 to facilitate learning and the acquisition of competencies for a training product.
<b>Training Product</b>	Is a nationally recognised unit of competency, or accredited course, skill set, or qualification.
<b>USI</b>	Unique Student Identifier - A unique randomly generated alpha-numeric code allocated to an individual learner enrolled in Vocational Education and Training studies. The USI number allocated to an individual learner will be retained for life and be recorded with any national recognised VET curse that is undertaken form 2014 onwards.
<b>VET</b>	Vocational Education and Training.

## 5.0 Legislative Context

This policy and procedure reflects the following legislations, regulations, standards, and/or guidelines:

- [Standards for Registered Training Organisations \(RTO's\) 2015; Standard 2; Clause 2.2; Standard 7; Clause 7.5: and Standard 8; Clause 8.1.](#)
- [National Vocational Education and Training Regulator Act 2011](#), specifically Part 8; 187.
- [VET Data Policy](#)
- [Privacy Act 2011](#) (including the [Australian Privacy Principles](#))

## 6.0 Policy Statement

Australian business need to comply with privacy requirements set by federal protection laws. In addition to these business privacy requirements RTOs are required to abide by the Student Identifiers Act 2011. In general these requirements ensure Sonic HealthPlus' RTO is open and transparent about how a student's personal information is:

- Collected and managed
- Used and disclosed
- Kept up-to-date, correct and complete
- Kept secure, and
- Accessible for student to correct their information if required.

The RTO will endeavour to comply with the above by:

- Only collecting information directly from the person for one or more of our functions of the RTO. The student will be told the purposes for which the information is being collected for.
- Where information is being provided by another person, staff will take reasonable steps to validate the information for accuracy
- The information collected will be accurate, complete, and as up-to-date as possible
- Not disclosing a student's personal information to others unless the student has given their consent to do so
- Taking all reasonable steps to ensure student information collected and used is protected from misuse, loss, and from unauthorised access, modification or disclosure
- Collect and validate individual USIs
- Being open with students how we manage their personal information when asked by the student
- Not misusing or interfering with personal information
- Allowing students to request access, updates, and/or corrections to their personal information held by the RTO
- Only using Unique Identifiers e.g. proof of identify required to reissue certificate documentation
- Seeking consent from the student when collection sensitive information about the students such as health information or criminal record
- Notify students, SHP management, and the Australian Information Commissioner if a breach in data occurs (Notifiable Data Breach) as per the Australian Government; Office of the Australian Information Commissioner; [Data breach preparation and response, A guide to managing data breaches in accordance with the Privacy Act 188 \(Cth\)](#)
- Notifying staff and students of their and its obligations under the Australian Privacy Principles
- Ensure storage of personal information is secure
- Destroying personal information where required, and
- Disclose information to others where required. Others may include Commonwealth and State and Territory departments and authorised agencies, and NCVET.

The RTO will also endeavour to comply with privacy requirements of the organisation, Sonic HealthPlus by:

- Facilitating RTO staff training on organisational privacy requirements on induction
- Informing RTO staff of organisation privacy changes when required
- When possible, creating simulated patients/clients for learning purposes
- When using, real patient/client information for learning purposes all personal identifying information is retracted, removed, or unrecognisable
- Dispose and destruct any document that holds patient/client information as per the organisation's policy and procedure
- Respond to breaches of privacy as per organisational directions.

## 7.0 Procedure

### Collection and Use of Personal Information

The RTO will only collect personal information by fair and lawful means which is necessary for the functions of the RTO and is committed to ensure the confidentiality and security of the information provided. The RTO may collect personal information in electronic or hard copy format and the information may include, but not limited to an individual's:

- Name
- Date of Birth
- Address
- Contact details (email and phone)
- Ethnic background
- Schooling/ training history.

This information is collected primarily during student profile creation and course enrolment. During student profile creation, the student's workplace provides, at a minimum, the students name, date of birth, and email address. Additional information is then collected directly from the student via an electronic enrolment form.

The RTO will only use the information to supply material about study opportunities, to enable efficient course administration, and to maintain proper academic records. If an individual chooses not to give certain information then the RTO may be unable to enrol that individual in a course or supply them with appropriate information or certification documentation.

Personal information will not be used to remarket training opportunities.

### **Disclosure of Personal Information**

The RTO will not use or disclose personal information about a student for a purpose other than providing educational services and communication (primary purpose). However, the information that a student provides may be disclosed or shared with the Australian Government and designated authorities and organisations that run courses in conjunction with Sonic HealthPlus. The RTO will seek consent and written approval from an individual prior to disclosing their personal information other than when directed by law.

### **Security of Personal Information**

The RTO will take all reasonable steps to ensure the security of personal information held from any unauthorised access, misuse, loss, damage or disclosure. It will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed.

### **Access and Correction**

Students have the right to access or obtain a copy of the personal information that the RTO holds about them including VET personal information. Request to access or obtain a copy of personal information must be made in writing and sent to the RTO Team via [Training@sonichealthplus.com.au](mailto:Training@sonichealthplus.com.au)

The RTO will take all reasonable steps to ensure that any personal information collected is relevant to the purpose for which it was collected, is up-to-date and complete. However, if a student considers their personal information to be incorrect, incomplete, out-of-date or misleading, they can request that the information be amended by emailing [Training@sonichealthplus.com.au](mailto:Training@sonichealthplus.com.au)

### **Concerns and Complaints**

Individuals may express concerns or lodge a complaint about any breach of the Australian Privacy Principles code. Students are asked to initially lodge a concern or complaint with the RTO in writing to the RTO via email, [Training@sonichealthplus.com.au](mailto:Training@sonichealthplus.com.au) so the RTO can address the matter. A student can however lodge a concern or complaint to the Office of the Australian Information Commissioner (OAIC) at any time.

### **Breaches**

The RTO will notify students in the event of a data breach, in line with the amendments to the Privacy Act, for mandatory reporting of data breaches.

### **Unique Student Identifiers**

The RTO will take all reasonable steps to collect a Student's USI at enrolment and before training commences. However the RTO may take steps throughout the student's lifecycle to collect a student's USI. Once collected, USIs will be validated automatically through the Student Management System. Certificate documentation shall not be issued if a student does not supply a verified USI.

The RTO will provide students with resources to support the creation of a USI, or to gain access to their online transcript where required. No USI will be printed on any academic transcript, statement of attainment or certificate.

### **Quality Indicator Data**

The RTO will collect data on the quality indicators for the previous year's delivery of training as per the Data Provision Requirements 2012 and provide these to ASQA annually on the 30th June. The data shall be collected via a learner engagement and employer satisfaction questionnaire and submitted as a quality indicator annual summary report. All records of collected surveys and submitted data needs to be retained by the RTO.

### **Total VET Activity Reporting**

The RTO will collect data for all learners, and for all competency enrolments and the outcomes achieved for the previous calendar year as per the Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) requirements. This data will be submitted as the Total VET Activity Report to the National Centre for Vocational Education Research (NCVER).

Personal information that has been disclosed to NCVER may be used or disclosed by 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.

## **8.0 Related Documents**

[Office of the Australian Information Commissioner website](#)

[Notifiable Data Breaches Scheme website](#)

[NCVER New National VET Data Policy](#)