

1. Policy objective

The objective of this policy is to ensure that information collected and handled, for and by RGIT Australia, is within the Privacy Act 1988 (Cth), Freedom of Information Act (1982), Australian Privacy Principles (APPs) (2014), VET Student Loans Act (1996), and protected and utilised only in the light of its primary purpose.

2. Scope

This Policy applies to all RGIT Australia students, managers, officers, workers and contractors. The collected information will be either in electronic or in hard copy format.

3. Responsibility

The Chief Operations Officer is responsible for the implementation and monitoring of this policy and all Departmental Manager will be responsible to ensure that staff and students are made aware of its application.

4. Policy statement

- 4.1 To enable to fulfil our responsibilities as a Registered Training Organisation (RTO), RGIT Australia will collect, use, store, and disseminate personal information, as defined by the Privacy and Personal Information Protection Act 1998, in a manner consistent with the Information Protection Principles contained within that Act and those requirements as outlined in the Data Provisions of the VET Quality Framework NVR Standards for RTOs, including all data required for AVETMISS and other required reporting.
- 4.2 RGIT Australia takes privacy very seriously and is committed to protecting the privacy of individuals. This includes personal, health, financial and other confidential information which is necessary for RGIT Australia to carry out its functions;
- 4.3 RGIT Australia will take all reasonable steps to protect individual information from loss, misuse or unauthorised disclosure or destruction. The right to privacy is a value that is highly regarded;
- 4.5 RGIT Australia students' personal information will be collected by fair and lawful means which is necessary for the purpose of enrolment and function of RGIT Australia and the institute is committed to ensuring the confidentiality and security of the information provided.

5. Procedures

5.1 Managing personal information

When managing a student's personal information, RGIT Australia is required to comply with Government legislation and policy as mentioned above.

RGIT Australia endeavours to balance the rights of privacy with the need to be accountable and transparent in its dealings. RGIT Australia manages students' personal information in an open and transparent way. However, certain information will not be available under freedom of information laws. This includes private information relating to another individual, RGIT Australia's internal working documents and material obtained in confidence. In addition, RGIT Australia's Document and Record Register provides a framework and instructions to staff regarding how and why RGIT Australia collects, stores and uses students' personal information and how an individual may access his or her personal information held by RGIT Australia. It also consists of a procedure for making complaints about RGIT Australia breaches of the APPs and how the RGIT Australia will deal with a complaint.

5.2 Access and correction of information

- i) Access of data available with RGIT Australia
 - (1) RGIT Australia acknowledges that as per the APP 12, it is required to provide access to all of an individual's personal information it holds, even if that information is also the personal information of another individual, unless there are mitigating circumstances precluding access or legal grounds to refuse access.
 - (2) RGIT Australia shall consider whether the individual has a right of access to the information under other legislation. If not, RGIT Australia may make a discretionary decision to either grant or deny access to the information.
- ii) Verifying an individual's identity
 - (1) RGIT Australia must be satisfied that a request for personal information under APP 12 is made by the individual concerned, or by another person who is authorised to make a request on their behalf, for example, a legal guardian or authorised agent.
 - (2) It would be impracticable for RGIT Australia to deal with an anonymous request for personal information.
 - (3) The steps appropriate to verify an individual's identity will depend on the circumstances. In particular, whether the individual is already known to or readily identifiable by RGIT Australia. The minimum amount of personal information needed to establish an individual's identity will be sought and this information would be verified on RGIT Australia's systems (i.e. its Student Management System). Where possible, the information may be sighted rather than copied or collected for inclusion in a record. For example, in a face-to-face dealing with an individual RGIT Australia may reserve the right to record that an identity document was sighted without copying the document.
 - (4) RGIT Australia also provides that, without limiting APP 12.5, 'access may be given through the use of a mutually agreed intermediary.' where direct access would otherwise be refused. For example, an intermediary may need to be a qualified health service provider if used to give access to health information.
- iii) Correction of information available with RGIT Australia
 - (1) In line with the APP 13.1, RGIT Australia will take reasonable steps to correct personal information it holds, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard for the purpose for which it is held.
 - (2) The requirement to take reasonable steps applies in two circumstances:
 - (a) Where RGIT Australia is satisfied, independently of any request, that personal information it holds is faulty; or
 - (b) Where an individual requests RGIT Australia to correct their personal information.
 - (3) RGIT Australia will follow minimum procedural requirements in relation to correcting personal information by:
 - (a) Providing a written notice to an individual when a correction request is refused, including the reasons for the refusal and the complaint mechanisms available to the individual;
 - (b) Responding in a timely manner to an individual's request to correct personal information or to associate a statement with the information; and
 - (c) Not charging an individual for making a request to correct personal information or associate a statement, or for making a correction or associating a statement.