

# R

## RTO Management

### R6 Privacy

Standards Evidenced	
Standards Referenced	Standard 3, Clause 3.6 Standard 5, Clause 5.2(d)

## Purpose

Master Plumbers, as a national Registered Training Organisation, is committed to the protection of personal privacy as required by the [Privacy Act 1988](#) (Privacy Act), including the [Australian Privacy Principles](#) (APPs), and the *Privacy and Data Protection Act 2014* (Vic) and the *Health Records Act 2001* (Vic.) and will fully comply with the principles set out in the National Privacy Principles contained in Schedule 3 of the Privacy Act.

## Definitions

Personal information is defined under the Privacy Act as information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not, and
- b. whether the information or opinion is recorded in a material form or not.

Some examples of personal information include names, addresses, phone numbers and email addresses.

The definition of personal information only relates to 'natural' persons. It does not extend to other 'legal' persons, such as companies.

## General policy

Master Plumbers RTO is committed and complies with the principles of both state and federal legislation that protect the privacy of staff, students and employers. This policy ensures that the Master Plumbers RTO will:

- Only collect personal information (including images) with the consent of the individual;
- Only collect personal information with the knowledge and consent of the person;
- Only use personal information for the purposes for which it was collected;
- Not disclose, resell, licence, distribute or share personal information with, a third party without the prior written consent of the person;
- Only disclose personal information to state institutions or authorities where required by law or regulation or where a binding legal undertaking is in place;
- Ensure that demographic and other statistical information is not linked to any personal information that can disclose the identity of a person; and
- Use from time to time, a person's contact details to provide them with information about its programs or activities.

## How information may be collected

Personal information may be collected through:

- Online enrolment and enquiries including resolving Unique Student Identifier (USI) issues
- Attending events and seminars

- In phone, email or face to face conversation
- Application for RPL or Credit Transfer
- Completion of a Pretraining Review and Induction (Apprentice)
- Application for fee relief or payment plan
- Payment of fees online or over the phone

The protection of an individual's privacy and obligations under this policy applies regardless of how the personal information was obtained.

## Why we collect personal information

Master Plumbers RTO will collect personal information as part of our legal obligations with the Victorian government and regulatory requirements with Commonwealth agencies. When personal information is being collected, Master Plumbers will take reasonable steps to notify the individual of their rights under this policy.

Master Plumbers also collects information to assist students in the education services provided and provision of access to the student and employer online information portals.

In some instances, Master Plumbers RTO may release personal and enrolment information, including academic results, of students undertaking apprenticeship training to their employer.

## Student access to personal information

Students may access personal information including training files, personal records and file notes by completing form [MPF004 Request for student information](#) and providing appropriate identification. Personal information will only be released to the owner of the information with the exception of apprentice academic progress which can be released to the employer.

Master plumbers will correct any personal information that it holds provided that it can be verified by Master Plumbers RTO that the information is inaccurate or incomplete.

## Staff access to personal information

Personal information (including name, contact details, working history and relevant qualifications) is retained for all staff. Information to provide information to determine vocational and VET currency of training staff. Digital copies of all records are stored on a secure SharePoint site. Staff may upon request access their digital records.

## Master Plumbers website

The Master Plumbers RTO continues to take all reasonable steps to protect the privacy and security of all users. Secure payment transactions are through a third party encrypted gateway that protects users from fraudulent activity.

The Master Plumbers website uses cookies to gather basic statistical information only including:

- server address;
- top level domain name;
- date and time of each visit to the site;
- pages accessed and documents viewed;
- previous site visited;
- browser type;
- browser language;
- cookies that may uniquely identify a browser.

Master Plumbers RTO website may contain links to external sites and is not responsible for the accuracy or the privacy practices of such sites.

Visitors to the Master Plumbers RTO will be directed to this policy and for enrolment purposes acknowledge they have accessed and accepted the privacy statement.

## Disclosure of personal information

Master Plumbers RTO may release personal information to:

- Government authorities and organisations with legitimate legal right such as courts or law enforcement agencies as required by a summons, subpoena or other appropriate document;
- State or federal authorities in specific circumstance (e.g. child abuse, dangerous/threatening behaviour, medical emergency)
- Government authorities for the collection of personal details for national surveys.

## Data security

Master Plumbers will take reasonable steps to ensure the security of all data collected and retained. Reasonable efforts will be taken to ensure the integrity of data that is held and implement processes to avoid unauthorised access, loss or alteration of data.

Access to digital data on servers, cloud storage or within the student management system (VETtrak) is password secured. Level of staff access to personal and sensitive information is managed through assigned password-based privileges to server drives, SharePoint sites and software functionality.

Personal information no longer required will be destroyed as per the Master Plumbers RTO *Document retention and destruction policy*.

## Online portal security

Students, staff and employers are provided unique passwords to access online portals operated by the RTO. All passwords are automatically generated by the student manager system and conveyed to authorised recipients via SMS and/or email supplied.

## Finance

Master Plumbers RTO will collect personal information in relation to financial transactions for the payment of fees. Online payments via credit card or funds transfer are conducted via a secure transaction gateway that complies with industry data security standards. Master Plumbers RTO will not store or retain credit card details. Financial information collected over the phone or by email will be destroyed once processing has been completed.

## Further information and privacy enquiries

All enquiries must be in writing to Manager Training and Industry Development, 22-28 Phoenix Street, Brunswick, Vic 3056. Further advice on privacy matters may also be referred to 03 9356 7300.

## Supporting processes

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

Process Name	Purpose
Document retention and destruction policy	Secure retention and destruction of personal information held by Master Plumbers RTO

## Supporting Forms and Documents

Document Identifier	Name
MPF004	Request for student information
MPF010	Enrolment Form
MPF016	Individual Copyright Permission and Release
MPF037	National Recognition (Credit Transfer) Application Form
MPF050	Complaint and Appeals Form
MPF083	Pretraining Review & Induction (Apprentice)

## Evidence

To Evidence	Source

--- End of Policy ---

## Approval

Approved By	Position	Signature	Date
Brendan Gould	Manager Training and Industry Development		15/01/2021

## Version Control

Version #	Date	Changes
1.0	15/01/21	First release