

PRIVACY POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline Smartlink Training's approach to ensuring the privacy and confidentiality of all its staff, students and authorised third- party providers and any other relevant parties.

Smartlink Training and all its staff and authorised third- party providers and any other relevant parties will ensure to follow this privacy policy throughout the student's training and assessment journey across all its operations.

This policy and associated procedures meet the requirements of information management of Standard 4.3 of the Outcome Standards for RTOs and Compliance Requirements (Section 1) regarding information management, as well as the National VET Regulator (Data Provision Requirements) Instrument 2020 and National VET Data Policy.

POLICY STATEMENTS

PRIVACY LEGISLATION AND PRINCIPLES

Smartlink Training has adopted the Australian Privacy Principles contained in the *Privacy Act 1988*.

COLLECTION OF PERSONAL INFORMATION

Smartlink Training collects personal information only for the purposes of its business operations as an NVR registered training organisation and must comply with all applicable Commonwealth, State and Territory laws and all other relevant RTO requirements related to Compliance Standards and Outcome Standards.

Smartlink Training also collects personal information about students undertaking nationally recognised training and discloses this information to the National Centre for Vocational Education Research Ltd (NCVER).

Smartlink Training provides notification to staff and students about why their information is being collected and how it will be used, as well as their ability to access information held about them.

Both staff and students have the right to request that their personal information be changed.

A Privacy Notice is included in the Enrolment Form to inform learners about the collection, use, and disclosure of their personal information in accordance with the *Privacy Act 1988* and the 2025 Standards for RTOs.

Staff contracts refer to privacy rights and obligations. All staff and authorised third party providers are provided with the relevant information during induction and through ongoing professional development and training activities on their legislative obligations, any breaches and how that affects their roles and responsibilities. All staff will ensure to follow privacy and confidentiality laws and ensure to get the students consent when dealing with any personal and or sensitive information.

All personal information is always kept secure and confidential, in line with *Privacy Act 1988* and reasonable cybersecurity principles.

All persons have the right to make a complaint or appeal in relation to privacy matters as per Smartlink Training's Complaints and Appeals Policy and Procedures.

Where a prospective student has chosen to disclose information regarding their disability, this information will only be used to inform reasonable adjustments (that apply to training and assessment) and will be stored safely according to the procedures in this document.

Student wellbeing is of paramount importance to Smartlink Training. Smartlink Training will provide the necessary support or guide the students to external support services through the external support referrals contact list based on their needs. However, Smartlink Training will not take action to address the wellbeing issues of students without their consent, to safeguard students' privacy.

SENSITIVE INFORMATION

Smartlink Training collects sensitive information. Sensitive information is defined in the *Privacy Act 1988* to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will only be used by Smartlink Training:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose; with an individual's consent or where required or authorised by law.

All sensitive information is always kept secure and confidential, in line with *Privacy Act 1988* and reasonable cybersecurity principles.

STUDENT IDENTIFIERS

Smartlink complies with the *Student Identifiers Act 2014* when handling personal information in relation to Student Identifiers, including the *Student Identifiers Act 2014*'s interaction with the *Privacy Act 1988*.

Smartlink Training's student management system (SMS) PowerPro RTO is interfaced with the USI (Unique Student Identifier) register, allowing to verify USI's in a private and protected manner. PowerPro RTO cannot be downloaded to any device without an access key given only by PowerPro RTO's administrators. A unique username and password is then required to access PowerPro RTO which contains student records. Smartlink Training will ensure that only authorised and trained RTO staff have access to PowerPro RTO and the student records stored within. Smartlink Training ensures to provide only limited access to relevant RTO personnel. PowerPro RTO's systems follow the same privacy legislation as Smartlink, to protect students' privacy.

PROCEDURES

1. MANAGE PERSONAL INFORMATION

- 1.1 Process all personal information by entering it into the PowerPro RTO Student Management System (SMS).
- 1.2 This personal information is stored securely in PowerPro RTO for at least the legislated period.

2. PROVIDE ACCESS TO RECORDS

- 2.1 Review written requests for access to records.
- 2.2 Arrange for the individual to view their personal information as requested.
- 2.3 Update personal information according to any requests made.
- 2.4 Keep all documentation relating to access to and change of records.

RESPONSIBILITIES

The RTO Manager is responsible for ensuring that the policies and procedures detailed in this document are followed at all times by all staff, including authorised third-party delivery partners. The RTO Manager will use the monitoring checklist to ensure that authorised third-party delivery partners follow Smartlink's privacy policy and procedures. The Administration and Student Support Officer are responsible for processing all personal information and providing access to records as required.