

# Management of Personal Information Policy

## INTRODUCTION

Surf Life Saving Western Australia Inc. (SLSWA), RTO code: 51104, abides by amendments to the *Privacy Act 1988* (Cth) – updated June 2021, that regulates the collection, use and storage of personal information by private sector organisations. This policy document is available to any person who requests a copy and is intended to set out the policies and practices of SLSWA on management of personal information. It also outlines how the personal information of individuals is managed by SLSWA.

In this document, personal information means “information or an opinion (including information on an opinion forming part of the data base) whether true or not and whether recorded in material form or not, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion”.

Personal information includes:

- Name
- Address
- Telephone/fax number
- Email address
- Residential and Postal addresses
- Other information that may identify an individual such a photograph
- Other information about an individual whose identity can be ascertained from that information (USI number).

## NCVER REPORTING

Under the Federal legislation, *National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020*, Surf Life Saving Western Australia Inc. (SLSWA) is required to collect personal information about you and to disclose that personal information to the National Centre for Vocational Education Research Ltd (NCVER).

Your personal information (including the personal information contained on your enrolment form), may be used or disclosed by SLSWA for statistical, administrative, regulatory and research purposes. SLSWA may disclose your personal information for these purposes to the:

- Commonwealth and State or Territory government departments and authorised agencies; and
- 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.

You may receive a student survey that may be administered by a government department or NCVET employee, agent or third party contractor or other authorised agencies. Please note, you may opt out of the survey at the time of being contacted.

NCVER will collect, hold, use and disclose your personal information in accordance with the *Privacy Act 1988* (Cth), the National VET Data Policy (December 2020) and all NCVET policies and protocols (including those published on NCVET’s website at [www.ncver.edu.au](http://www.ncver.edu.au)).

## COLLECTION OF INFORMATION

1. SLSWA does not seek to collect personal information unless that information is necessary for one or more of its functions or activities.
2. As far as is reasonable and practicable to do so, SLSWA will seek to collect personal information about an individual from that individual.
3. SLSWA will collect personal information only by lawful and fair means and not in unreasonably intrusive ways.
4. Where SLSWA collect personal information from an individual, SLSWA will take reasonable steps to ensure the individual is aware of:
  - a) the identity of SLSWA and how to contact the organisation;
  - b) the purpose for which information is collected;
  - c) the fact that the individual is able to gain access to the information;
  - d) the organisations or types of organisations to which SLSWA usually discloses information of that kind;
  - e) any laws that require the particular information to be collected;
  - f) the main consequences (if any) for the individual if all or part of the information is not provided.
5. Where SLSWA collects personal information about an individual from someone else, it will take reasonable steps to ensure that the individual is, or has been, made aware of the matters listed in sub clause 4 above, except in circumstances where, to do so, would pose a serious threat to the life or health of an individual.

## USE AND DISCLOSURE

SLSWA may use or disclose personal information for a purpose other than the primary purpose of collection where:

1. the purpose is related to the primary purpose of collection (and if personal information is sensitive information, directly related to the primary purpose of collection; and
2. the individual would reasonably expect that SLSWA would use or disclose information for the secondary purpose; or
3. the individual has consented to the use or disclosure; or
4. the information is not sensitive information and is used for the secondary purpose of direct marketing.

## DATA QUALITY

SLSWA will take steps to ensure that the personal information that it collects, uses, or discloses is accurate, complete and up to date.

## DATA SECURITY

SLSWA will take reasonable steps to protect the personal information it holds from misuse, loss, unauthorised access, modification, or disclosure. Where information is no longer needed for any purpose for which the information may be used or disclosed, SLSWA will take reasonable steps to destroy or permanently de-identify the personal information.

## ACCESSING INFORMATION

Where SLSWA holds personal information about an individual, it will provide the individual with access to that information on request by the individual in accordance with the relevant privacy principles. Whilst SLSWA may adopt its own identifier of an individual, it will do so only in accordance with the relevant privacy principles.

## ANONYMITY

Whenever it is lawful and practicable, individuals dealing with SLSWA will have an option of not identifying themselves. Any individual who proposes to transact with SLSWA should expect that SLSWA is likely to require full and complete disclosure of name, address, telephone numbers, postal address and email address.

## SENSITIVE INFORMATION

SLSWA will collect sensitive information about an individual only where the individual has consented, where the collection is required by law, or otherwise in accordance with relevant privacy principles.

## USI VERIFICATION

Before verifying a USI, the candidate must give the exact information they used when they created their USI. This may be different to previous on record.

- SLSWA is responsible for verifying each USI collected from the candidate
- SLSWA only need to verify a candidates USI once
- If you have applied for the USI on behalf of a student and received the number from the USI Registry System, that USI is already verified.

### Different ways a USI can be verified:

1. one by one through the USI website (Organisation Portal)
2. one by one through your Student Management System (SMS) if it has a connection to the USI Registry System
3. in batches of up to 500 through your SMS if it has a connection to the USI Registry System

### How does the USI Registry System verify the USI?

The USI Registry System:

1. Checks that the USI contains the correct number and type of characters, this check results in a 'valid' or 'invalid' result.
2. Checks the student's first name, last name and date of birth, this check returns a 'match' or 'no match' result.

*If an incorrect 'match' occurs, the student may have provided an incorrect USI number, or altered their personal information.*

### ***Consent for collection, use or disclosure of personal information***

The following is provided to you on behalf of the Student Identifiers Registrar (Registrar).

You are advised and agree that you understand and consent that the personal information you provide in connection with your application for a Unique Student Identifier (USI):

- Is collected by the Registrar as authorised by the Student Identifiers Act 2014.
- is collected by the Registrar for the purposes of:
  - applying for, verifying and giving a USI;
  - resolving problems with a USI; and
  - creating authenticated vocational education and training (VET) transcripts;
- may be disclosed to:
  - Commonwealth and State/Territory government departments and agencies and statutory bodies performing functions relating to VET for:
    - the purposes of administering and auditing VET, VET providers and VET programs;
    - education related policy and research purposes; and
    - to assist in determining eligibility for training subsidies;
  - VET Regulators to enable them to perform their VET regulatory functions;
  - VET Admission Bodies for the purposes of administering VET and VET programs;

- current and former Registered Training Organisations to enable them to deliver VET courses to the individual, meet their reporting obligations under the VET standards and government contracts and assist in determining eligibility for training subsidies;
  - schools for the purposes of delivering VET courses to the individual and reporting on these courses;
  - the National Centre for Vocational Education Research for the purpose of creating authenticated VET transcripts, resolving problems with USIs and for the collection, preparation and auditing of national VET statistics;
  - researchers for education and training related research purposes;
  - any other person or agency that may be authorised or required by law to access the information;
  - any entity contractually engaged by the Student Identifiers Registrar to assist in the performance of his or her functions in the administration of the USI Registry System; and
- Will not otherwise be disclosed without your consent unless authorised or required by or under law.
  - The consequences for not providing the Registrar with some or all of your personal information are that the Registrar will not be able to issue you with a USI.

**Reference;** <https://www.usi.gov.au/user-guide-and-fast-facts>

### ***How to contact SLSWA***

If you have any questions in relation to privacy, please contact Surf Life Saving Western Australia Inc. via our website <http://www.mybeach.com.au/>.