



Privacy Policy

1. Purpose

The purpose of this policy is to outline how ALACC collects, stores, uses, discloses, protects, and corrects personal and sensitive information in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**. It ensures ALACC meets its obligations under relevant laws and the **2025 Standards for RTOs**, particularly **Standard 8, Clause 8.5**, regarding the accurate management and security of personal information.

2. Scope

This policy applies to all personal and sensitive information collected by ALACC relating to students, staff, contractors, alumni, applicants, and stakeholders.

3. Definitions

- **Personal Information:** Information or opinion about an identified individual or an individual who is reasonably identifiable, whether the information is true or not, and whether recorded in material form or not.
- **Sensitive Information:** Personal information that includes racial or ethnic origin, political opinions, religious beliefs, health information, sexual orientation, or criminal record.
- **Unsolicited Information:** Personal information received by ALACC that it did not actively seek to collect.
- **Authorities:** Government or statutory bodies with legal authority to request information.
- **Permitted General/Health Situations:** Situations as defined under the Privacy Act in which the collection, use or disclosure of personal or sensitive information is permitted without consent.

4. Collection of Personal Information

ALACC collects personal and sensitive information for functions including:

- Enrolment, education, assessment, graduation



- Providing support services (e.g. counselling, IT, library)
- Employment and recruitment of staff
- Engaging with alumni and community stakeholders
- Reporting to government bodies (e.g., ASQA, ANMAC, DHA, DET)
- Business operations and compliance

Information is primarily collected via applications, forms, interviews, and digital platforms.

5. Anonymity and Pseudonymity

Where lawful and practicable, individuals may deal with ALACC anonymously or using a pseudonym. However, due to compliance requirements, full identification is usually necessary.

6. Notification of Collection

Where practical, ALACC will inform individuals at or before the time of collection about:

- ALACC's identity and contact details
- Purpose of collection
- Consequences of non-provision
- Disclosure recipients
- Access and correction procedures
- Complaints process
- Overseas disclosures (if any)

7. Use and Disclosure of Personal Information

ALACC uses and discloses personal information:

- For the purpose it was collected (primary purpose)
- For a secondary purpose only when:
 - The individual consents



- The individual would reasonably expect it
- Required or authorised by law
- For enforcement or permitted general/health situations

8. Direct Marketing

ALACC will not use personal information for direct marketing unless:

- It was collected directly from the individual
- The individual would reasonably expect such use
- A simple opt-out is provided

ALACC will provide the source of the information upon request, unless unreasonable to do so.

9. Cross-Border Disclosures

If ALACC discloses personal information to overseas entities (e.g., education or migration agents), it will take reasonable steps to ensure the overseas recipient does not breach this policy.

10. Use of Government Related Identifiers

ALACC will not adopt or disclose government-related identifiers (e.g., TFNs, USI) unless required by law or for identity verification purposes.

11. Quality of Information

ALACC takes reasonable steps to ensure that information collected, used, and disclosed is accurate, up-to-date, complete, and relevant.

Individuals must inform ALACC of any changes to their personal information within **7 days**.

12. Security of Information

ALACC protects personal information through:

- Staff confidentiality awareness
- Secure login access and audit trails



- Limited access to authorised staff only
- Remote access controls (only by CEO/IT)
- Auto-revocation of access for resigned or inactive users
- Secure destruction or de-identification of information no longer required, unless retention is required by law

13. Access and Correction

Individuals have the right to request access to their personal information by submitting a request via the ALACC website or emailing **info@alacchealth.edu.au**.

ALACC will:

- Respond within **30 days**
- Provide access in a practical format (usually electronic)
- Refuse access only in cases outlined under APP 12 (e.g., safety, legal proceedings)
- Provide written reasons and complaint options if access is denied

Correction of personal information will be made if:

- The data is inaccurate, incomplete, or outdated, or
- The individual requests a correction and ALACC agrees

Where correction is refused, ALACC will:

- Explain the reasons
- Inform the individual of complaint options
- Attach a statement of dispute to the record, if requested

14. Complaints

Complaints about a breach of this policy or the APPs can be submitted through the:

- **ALACC Complaints and Appeals Process** (online form or in person)
- **Office of the Australian Information Commissioner** via <https://www.oaic.gov.au>



15. Record Keeping

ALACC maintains records of:

- Access and correction requests
- Appeals and outcomes
- Complaints and correspondence with OAIC

16. Non-Compliance

Any breaches must be reported in accordance with the **Complaints and Appeals Policy**. The CEO will investigate all suspected or confirmed breaches.

17. Related Legislation and Policies

- Privacy Act 1988 (Cth)
- National VET Data Policy 2018
- Information Privacy Act 2000 (VIC)
- ALACC Complaints and Appeals Policy
- ALACC Fees Policy

18. Contact Details

Privacy Officer

Australasian Lawrence Aged Care College
189 Plenty Road, Preston VIC 3072
Email: info@alacchealth.edu.au
Website: www.alacchealth.edu.au

19. Document Control



Policy:	Privacy Policy
Policy owner:	CEO / Director of Studies
Reviewed by:	Compliance Team
Approval authority:	Dr Janet Lawrence, D.Ed., FACN CEO/Director of Studies
Last Review date:	April 2025
Version:	2025.1
Next review:	April 2027
Summary of changes:	Policy reviewed and updated to align with the Australian Privacy Principles (APPs) under the Privacy Act 1988 and the revised 2025 ASQA Standards, particularly regarding data collection, security, access rights, and staff responsibilities. Clarified roles, updated legal references, and added explicit contact information for the Privacy Officer. Also merged the separate student privacy policy we had.