Procedure

**Document Title:** Management of Mater Education Limited students' personal information for the purposes of VET FEE-HELP

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- VET FEE-HELP
- VFH
- Mater Education Limited
- MEL students
- privacy

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**Our Mission**

In the spirit of the Sisters of Mercy, Mater Health Services offer compassionate service to the sick and needy, promotes an holistic approach to healthcare in response to changing community needs and foster high standards in health-related education and research. Following the example of Christ the healer, we commit ourselves to offering these services without discrimination.

**Our Vision**

In the Mercy tradition, Mater will be renowned as a leader in the delivery of exceptional healthcare and experienced by all as a community of compassion.

**Our Values**

- Mercy
- Dignity
- Care
- Commitment
- Quality

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**Affirmation**

This governance document is consistent with the Mater Values and supports the Mater’s Mission and Vision by establishing and mandating appropriate controls to support the delivery of health care services.
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# Document Controls

## 1.1 Document Revision History

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<th>Version</th>
<th>Date</th>
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<tbody>
<tr>
<td>1</td>
<td>02/06/2015</td>
<td>Final</td>
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<td>2</td>
<td>11/06/2015</td>
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## 1.2 Document Review and Approval

<table>
<thead>
<tr>
<th>Person Name / Committee</th>
<th>Position (if applicable)</th>
<th>Function (Owner</th>
<th>Review</th>
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<tbody>
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<td></td>
<td>Approve</td>
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## 1.3 References

### Internal Documents

<table>
<thead>
<tr>
<th>Document Type</th>
<th>Document ID</th>
<th>Document Title</th>
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<tbody>
<tr>
<td>Governing</td>
<td>PY-IID-100016</td>
<td>Information Privacy Policy</td>
</tr>
<tr>
<td>Supporting</td>
<td></td>
<td></td>
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<tr>
<td>Related</td>
<td>PY-MEL-040002</td>
<td>Mater Education Limited (MEL) Non-Academic Grievance Policy</td>
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<tr>
<td></td>
<td>PR-MEL-040005</td>
<td>MEL Students Complaints and Appeals</td>
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### External Documents

2. Australian Privacy Principles (APPs)
3. Privacy Act 1988 (C’th)
4. Guidelines from the Australian Information Commissioner on the application of the Australian Privacy Principles
2 Introduction

2.1 Purpose
This procedure is in addition to and should be read in conjunction with Mater Health Services Information Privacy Policy (PY-IID-100016).

This document sets out Mater Education Limited’s (MEL) procedure in relation to the management of personal information.

2.2 Scope and Context
This Procedure applies to all students who have access to personal information collected by MEL and all persons about whom personal information is collected.

2.3 Definitions

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>MEL</td>
<td>Mater Education Limited</td>
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<tr>
<td>MEL Student/s</td>
<td>All persons enrolled, or seeking to enrol, in a unit of study with MEL that meets the course requirements under subclause 45(1) of Schedule 1A of the Act who are, or would be, entitled to VET FEE-HELP assistance under clause 43 of Schedule 1A of the Act and/or all persons enrolled, or seeking to enrol, in a MEL training program.</td>
</tr>
<tr>
<td>Australian Privacy Principles (APPs)</td>
<td>The Australian Privacy Principles regulate the handling of personal information by Australian government agencies and some private sector organisations.</td>
</tr>
<tr>
<td>VET FEE-HELP</td>
<td>An income contingent loan scheme for the VET sector that is an extension of FEE-HELP, part of the Higher Education Loan Program (HELP)</td>
</tr>
<tr>
<td>The Act</td>
<td>The Higher Education Support Act 2003</td>
</tr>
<tr>
<td>Personal Information</td>
<td>means 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</td>
</tr>
<tr>
<td>Sensitive Information</td>
<td>(a) information or an opinion about an individual’s: (i) racial or ethnic origin; or (ii) political opinions; or (iii) membership of a political association; or (iv) religious beliefs or affiliations; or (v) philosophical beliefs; or (vi) membership of a professional or trade association; or (vii) membership of a trade union; or (viii) sexual preferences or practices; or (ix) criminal record; that is also personal information; or (b) health information about an individual.</td>
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</table>
3 Procedures

3.1 Notification

In accordance with legal and policy requirements, this procedure will be available on MEL’s website and copies made available at no cost to those who require a copy.

3.2 Collection of Personal Information

Personal information will not be collected unless:

- the information is collected for a purpose directly related to students; and
- the collection of the information is necessary for or directly related to that purpose

Sensitive information will not be collected unless:

- the individual consents to the collection of the information and:
  
  i. the information is reasonably necessary for, or directly related to, one or more of the MEL’s functions or activities;
  
  ii. the collection of the information is required or authorised by or under an Australian law

3.3 Use & Disclosure

Information collected by MEL shall only be used for the purposes of providing education or as otherwise authorised by law. Use for any purpose other than the provision of education, including any other use by MEL staff, must be referred to the Manager, RTO Quality and Compliance. MEL is not entitled to use information collected from staff where those staff members were students without the consent of the staff member or otherwise authorised by law.

MEL may be required by the legal process (subpoena, search warrant, Notice of Discovery) to disclose personal information. A fee will apply for the provision of records for this purpose.

3.4 Access to Personal Information

MEL students may apply to receive a copy of their personal information held by MEL at no cost. MEL will respond to the request for access within 30 days after the request is made.

3.5 Consent

For the purposes of VET FEE-HELP, students must give informed consent to their information being provided to the Commonwealth.

Information shall only be collected, used and disclosed with the consent of the student.

3.6 Correction

MEL will take such steps as are reasonable to ensure that the personal information that it collects is accurate, up-to-date and complete.
MEL students may apply to request a correction to their personal information held by MEL and MEL will consider all such requests.

All requests for access or correction to personal information are to be directed to the Manager, RTO Quality and Compliance whose details follow.

Contact Details

Manager, RTO Quality and Compliance
Mater Education Limited
Level 4, Duncombe Building
Raymond Terrace, South Brisbane 4101
Tel: 07 3163 1500 Fax: 07 3163 8899
Email: mel@mater.org.au

3.7 Transmission, Storage and Maintenance of Information

MEL has an obligation to protect the information it holds from misuse and loss, as well as from unauthorised access, modification or disclosure.

Information must not be transferred outside of the MEL unless authorised by the Manager, RTO Quality and Compliance.

If personal information is not securely stored and managed there is an increased risk of privacy breaches.

Risk minimisation requires that steps be taken to protect information against both accidental loss and intentional breach. Practices that may lead to breaches of security include:

- leaving student records unattended at a public counter;
- not disposing of records/information in a secure manner;
- sharing of passwords/logins; and
- storing sensitive data on a laptop computer that is taken ‘off-site’ and not stored securely

Where individuals become aware of a breach of privacy they shall report the breach to the Manager, RTO Quality and Compliance.

Where MEL holds personal information about an individual; and

a. MEL no longer needs the information for any purpose for which the information may be used or disclosed; and

b. the information is not contained in a Commonwealth record; and

c. MEL is not required by or under an Australian law

MEL will take such steps as are reasonable to destroy the information or ensure that the information is de-identified.

3.8 Complaints

Complaints about breaches of privacy by MEL relating to personal information should follow established procedures relating to non-academic matters as set out in Mater Education Limited (MEL) Non-Academic Grievance Policy.