



Privacy Policy and Procedure

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1. PURPOSE

Delta Therapy Dogs values the privacy of all individuals and is committed to handling their information in a lawful and responsible manner.

This Policy and Procedure outlines the collection, storage, use and disclosure of personal information handling practices at Delta.

2. SCOPE

The Policy applies to all Delta Board Members, employees, contractors, and volunteers ("Personnel"), Students, Graduates, Members, Program Beneficiaries, donors, suppliers, and all other individuals with whom Delta Therapy Dogs interacts.

3. DEFINITIONS

Definitions are included in Appendix 1.

4. RESPONSIBILITIES

Role	Responsibility
Chief Executive Officer / Leadership Team	• Implement policy and procedures across the organisation • Ensure Personnel have access to and understand this policy and procedure • Ensure all managers/supervisors have access to support and advice to understand and implement policy and procedures • Review and update this document and supporting resources in consultation with relevant stakeholders • Provide training and advice in the application of policy and procedures
People Managers	• Ensure Personnel have access to and understand this policy and procedure • Ensure policy and procedure is followed and implemented
All Personnel	• Compliance with policy and procedure.

5. POLICY

Delta collects Personal Information – including in some instances Sensitive and Health Information – pertaining to its Personnel, Students, Program Beneficiaries, Graduates, Members, donors, suppliers, and other individuals with whom Delta interacts through a variety of paper and electronic formats.

All information collected is for the purposes of the operations of Delta or where dictated by legislative guidelines.

Delta values the privacy of individuals and is committed to handling their personal information in a lawful and responsible manner. Delta is committed to ensuring that it is compliant with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth), applicable State and Territory Privacy and/or Health Laws.

6. PROCEDURE

Collecting Information

Delta collects information only where it is necessary in order to carry out its functions and activities.

As part of running the organisation, Delta collects information for various purposes, including but not limited to:

- the recruitment and engagement of Personnel;
- the provision of program and education delivery;
- the placement of Personnel in placements with its Program Partners;
- the education of Students;
- the engagement and support of Graduates;
- the administration of Company records;
- the provision of supports to facilitate access and participation; and
- the management and engagement of donors and donations.

Delta may collect Personal Information such as:

- name;
- mailing and/or street address;
- email address;
- telephone number;
- date of birth;
- gender;
- emergency contact information;
- profession, occupation or job title;
- employment and/or volunteer experience;
- skills or qualifications; and
- details about the services received or enquired about.

In addition it may collect Sensitive Information such as:

- criminal records;
- identification to support application for criminal history checks;
- citizenship;
- racial information;
- details of memberships of a professional association; and
- banking information.

Health Information may also be collected from Applicants and Personnel, including:

- support requirements to facilitate access and participation;
- vaccination and/or immunity information; and
- health (physical or mental) status as applicable to the performance of duties of the Work to be / being undertaken.

We may also collect some information that is not Personal Information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how program beneficiaries access our services.

We collect your Personal Information directly from you unless it is unreasonable or impracticable to do so. When collecting Personal Information from you, we may collect in ways including:

- through your access and use of our website and social media platforms;
- when you complete an application for a position with our organisation;
- when you complete an application for the services provided by our organisation;
- when you complete a student or graduate membership enrolment application;
- during recruitment processes;
- via reports submitted by you following delivery of programs;
- via reports submitted by you from third parties – for example clearance to work from health practitioners
- during conversations between you and our representatives; or
- or purchase order.

We may also collect personal information from third parties including:

- from professional and personal referees;
- from third party companies such as credit reporting agencies;
- law enforcement agencies; or
- other government entities.

Delta will not use or disclose information unless the person about whom the information relates is aware of, or has consented to, the use or disclosure of their information. Personal information may be disclosed where an individual has consented to the disclosure.

In addition, information may be disclosed in situations where individuals have been informed of the usual practice of disclosure, for example provision of the immunisation status of a volunteer to a Delta Program Partner with whom that volunteer is to be placed as part of their volunteer role.

When collecting information, Delta will only collect it by lawful and fair means and not in an unreasonably intrusive way. When collecting information, the individual to whom the request relates should be advised of:

- a. the purpose for which Delta is collecting the information;
- b. how the individual can access or amend their information;
- c. to whom the information may be transferred or disclosed, and under what circumstances;
- d. whether the collection is required by law; and
- e. the consequences of not providing the information.

Delta will only collect sensitive or health information in limited circumstances (e.g. with the individual's informed consent, if required by law or regulatory authorities).

7. COMMUNICATION

We communicate our Privacy Policy and Procedure to all Personnel, to our Program Partners, and to our Institute Students and Graduates.

We involve our Personnel in reviews of our Privacy Policy and Procedure and communicate any significant alterations to all Personnel.

8. MONITORING AND REVIEW

This document will be reviewed at least annually. Some circumstances may trigger an early review, this includes but is not limited to legislative changes, organisational changes, incident outcomes and other matters deemed appropriate by the Board and/or Chief Executive Officer.

9. VERSION HISTORY

V0.1, October 2021

V1.0, October 2022

APPENDIX 1 – Definitions

Term	Definition
Applicants	Applying for a role
Delta	The organisation Delta Therapy Dogs.
Graduates	Graduate student members of the Delta Institute.
Health Information	'Health information' is generally afforded a higher level of protection under Privacy Laws. 'Health information' includes information or opinions about a person's: • physical and mental health • disability (at any time) • health preferences (including future provision of health services) • use of health services • bodily donations (for example, blood, organs), and • genetics
Members	Organisational members of Delta Therapy Dogs.
Personnel	All board members, staff, contractors and volunteers who undertake Work for the organisation, whether in a paid or unpaid capacity.
Policy	Refers to this document, the Privacy Policy for Delta Personnel.
Program Beneficiaries	Benefactors of the organisation's programs (including Therapy Dogs, Classroom Canines, Paws the Pressure, Dog Safe and Digi-Dogs).
Work	Activities undertaken by Personnel as part of their role with Delta Therapy Dogs, whether in a paid or unpaid capacity.
Personal Information	Personal information' is information or an opinion about an identified person (or a person who is 'reasonably identifiable'). Personal information includes a person's name, address, contact details (such as telephone number or email), date of birth, gender, sexuality and race.
Sensitive Information	'Sensitive information' is a special category of personal information and is subject to stricter legal requirements for collection, storage, use and disclosure. Under Privacy Laws, information is 'sensitive information' if it's information or an opinion about a person's: • racial or ethnic origin • political opinions • membership of a political association • religious beliefs or affiliations • philosophical beliefs • membership of a professional or trade association • membership of a trade union • sexual preferences or practices, or • criminal record Health information (discussed further below), genetic information or biometric information is also 'sensitive Information' under the federal Privacy Laws.
Students	Learners who are enrolled with the Delta Institute.



DI-PP402

RTO Privacy Notice

Purpose:	Delta Institute values the privacy of all individuals and is committed to handling their information in a lawful and responsible manner. This Policy and Procedure outlines the collection, storage, use and disclosure of personal information handling practices at Delta.
Responsibility:	The CEO is responsible for approving this policy and ensuring it is implemented. The General Manager – Institute is responsible for implementing and following this policy. Delta Institute staff and educators are responsible for following this policy.
Scope:	This Policy applies to Delta Institute's: a) Board members b) employees c) contractor educators d) members e) students f) graduates g) volunteers
Policy/ Process:	<u>Why We Collect Your Personal Information</u> As a registered training organisation (RTO), we collect your personal information so we can process and manage your enrolment in a vocational education and training (VET) course with us. <u>How We Use Your Personal Information</u> We use your personal information to enable us to deliver VET courses to you, and otherwise, as needed, to comply with our obligations as an RTO. <u>How We Disclose Your Personal Information</u> We may be required by law (under the National Vocational Education and Training Regulator Act 2011 (Cth) (NVETR Act)) to disclose the personal information we collect about you to the National Centre for Vocational Education Research Ltd (NCVER). NCVER is the National VET Data Custodian responsible for collecting, managing, analysing and communicating research and statistics about the Australian VET sector. <u>How the NCVER and Other Bodies Handle Your Personal Information</u> NCVER will collect, hold, use and disclose your personal information in accordance with the law, including the Privacy Act 1988 (Cth) (Privacy Act), the NVETR Act and the Student Identifiers Regulation 2014. NCVER may use and disclose your personal information for purposes that include populating authenticated VET transcripts; administration of VET; facilitation of statistics and research relating to education, including surveys and data linkage; and understanding the VET market. NCVER may disclose information to the Australian Government Department of Employment and Workplace Relations (DEWR), other relevant Commonwealth authorities, State and Territory authorities (other than registered training organisations) that deal with matters relating to VET and VET regulators for the purposes for which the legislation above permits. NCVER may also disclose personal information to persons engaged by NCVER to conduct research on NCVER's behalf. NCVER does not intend to disclose your personal information to any overseas recipients. Data submitted through a VET data system may undergo validation and quality assurance checks, which involve checking the submitted data against data held in other information systems, for example, the Unique Student Identifier Registry or the Australian Business Register.

	For more information about how the NCVER will handle your personal information please refer to the NCVER's Privacy Policy at www.ncver.edu.au/privacy. DEWR is authorised by law, including the Privacy Act and the NVETR Act, to collect, use and disclose your personal information to fulfil its functions and activities, including: • administration of VET, such as program administration, regulation, monitoring and evaluation • facilitation of statistics and research relating to education, including surveys and data linkage • understanding how the VET market operates for policy, workforce planning and consumer information. DEWR may be authorised by law to share 'public sector data' with third parties, including under the Data Availability and Transparency Act 2022 (Cth) (DAT Act). 'Public sector data' is defined in the DAT Act to mean "data lawfully collected, created or held by or on behalf of a Commonwealth body..." and therefore includes any data collected by the department as part of performing VET related functions. For more information about how DEWR will handle your personal information, please refer to the DEWR VET Privacy Notice at https://www.dewr.gov.au/national-vet-data/vet-privacy-notice. <u>Surveys</u> You may receive a student survey from a government department or an NCVER employee, agent, third-party contractor or another authorised agency. Please note you may opt out of the survey at the time of being contacted. <u>Contact Information</u> At any time, you may contact Delta Institute to: • request access to your personal information • correct your personal information • make a complaint about how your personal information has been handled • ask a question about this Privacy Notice Phone: 02 9575 4194 Email: course@deltainstitute.edu.au Address: PO Box 221, Earlwood NSW 2206 Delta Privacy Policy: Privacy Policy			
Relevant Records:	▪ Privacy Policy published on Delta Therapy Dogs' website & link on Delta Institute website ▪ Student Handbook ▪ Course Guide ▪ Feedback & Complaints Policy & Procedure			
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