

1. Purpose

1.1 This policy outlines the Organisation's commitment and requirements to comply with the applicable Australian Privacy Principles set out in the *Privacy Act 1988* (Cth).

2. Scope

2.1 This policy applies to all staff who are involved in the collection, use and storage of personal information held by Aviation Australia (AA).

3. Regulatory References

3.1 [Privacy Act 1988 – Australian Privacy Principles.](#)

4. Related Documentation

4.1 N/A

5. Glossary of Terms

5.1 **NCVER** – National Centre for Vocational Education and Research

5.2 **VET** – Vocational Education and Training

5.3 **Personal Information** - information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

5.4 **Sensitive Information** - is defined in the Privacy Act to mean information or an opinion about an individual'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.

6. Responsibilities

6.1 Business Managers are responsible for ensuring their staff adhere to and comply with the Australian Privacy Principles.

7. Policy

7.1 Collection

- 7.1.1 AA adheres to the Australian Privacy Principles in its collection, use, storage, disclosure and destruction of personal information.
- 7.1.2 AA only collects personal information necessary to perform AA's primary function and the collection of such information is managed in an open and transparent manner. All personal and sensitive information provided by students is stored confidentially and securely and in accordance with the Australian Privacy Principles.
- 7.1.3 AA seeks consent before the collection of sensitive information of which the collection of is a requirement governed by the National VET Regulator Act 2011.
- 7.1.4 AA ensures the students' consent is requested prior to soliciting personal or sensitive information.

7.2 Use

7.2.1 Information collected is used for the following purposes:

- Student administration
- VET administration, regulation and research

7.3 Disclosure

- 7.3.1 AA may collect personal and sensitive information from students at the point of enrolment. AA has a legislative obligation to collect this information and disclose it to the NCVER for the purpose of reporting VET statistical information. AA at times may also be obligated to disclose personal or sensitive information to Commonwealth and State government authorities and agencies.
- 7.3.2 AA will not disclose personal information to any other entity or individual without the students' consent except in the following circumstances:
- AA may be required or authorised by or under Australian Law.
 - AA may disclose personal information to the relevant government departments who may disclose the information to another government agency i.e. Department of Immigration.
 - Disclosure is necessary to reduce or prevent a serious threat to the health and safety of an individual or to the public.
 - It is suspected that unlawful activity of a serious nature that relates to AA's functions has been, is being or may be engaged in and AA reasonably believes that the disclosure is necessary in order to take appropriate action in relation to the matter.

7.4 Storage and Security

7.4.1 AA takes all reasonable steps to ensure personal information held by the organisation is protected from misuse, interference and loss, unauthorised access, modification or disclosure.

7.4.2 Information that is stored electronically is maintained in a secure and confidential manner. AA employs Internet firewalls and the AA network is password protected to control access as part of AA's data protection and security measures.

7.4.3 Access to electronic files located on the AA network where personal and sensitive information is stored is restricted only to employees who require the access in order to perform their work functions effectively.

7.5 Destruction and De-identification

7.5.1 AA is governed by multiple pieces of legislation requiring the organisation to hold personal information for a specified length of time. AA will take reasonable steps to destroy personal information if it is not required to be held for a legislative or a legitimate purpose.

7.6 Quality of personal information

7.6.1 AA makes all reasonable attempts to ensure that when personal information is collected, it is accurate, up-to-date and complete.

7.6.2 Should AA be required to disclose personal information, having regard to the purpose for disclosure, AA will ensure the personal information is accurate, up-to-date, complete and relevant.

7.7 Access to personal information

7.7.1 AA must be satisfied that a request for personal information is made by the individual concerned, or by another person who is authorised to make a request on their behalf (e.g. legal guardian). Depending on the circumstances, verification may be conducted over the phone; in this instance sufficient information is provided to the staff member by the individual in order for the staff member to release the information requested.

8. Records

8.1 Records of personal information held are stored on AA's secure network or in hard copy in accordance with the applicable regulatory guidelines.

9. Flowchart

9.1 N/A