	<b>Australian International Aviation College</b> <b>Personal Information &amp; Privacy policy</b> <b>Quality Control supporting document</b> <b>AIAC-QHS-PP-004_v1</b>	Page 1
		VERSION: 1
		01-Mar-2021

## Personal Information & Privacy Policy

This policy applies to students and staff. AIAC understands that student/staff privacy and the protection of personal information is critical. The Personal Information & Privacy policy (PIPP) outlines how AIAC manages and protects personal information.

### Purpose

The purpose of the PIPP is to provide information about:

- The information AIAC collects,
- How AIAC handles personal information,
- How students or staff can access their information or make a complaint about the way personal information is handled,
- AIACs' data breach policy and procedure (section 6).

AIAC and its employees will at all times act with integrity and respect when handling or disclosing personal information.

### Scope

The PIPP outlines how AIAC complies with the obligations under the Privacy Act 1988. The Australian Privacy Principles regulate how agencies may collect, store, use and disclose personal information and how individuals may access and correct any personal information stored by AIAC. AIAC is bound by and will adhere to the regulations as set out in the privacy act. The Privacy Act only applies to the collection of personal information by AIAC that is used in materials such as: printed documents, electronic documents/devices, website information and other published materials.

Referring to the Privacy Act, **personal information** 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.

## 1 Personal Information Collected by AIAC

The following personal information is collected and stored appropriately by AIAC.

- a) For identification purposes, AIAC collects certified copies of passports or birth certificates, drivers licence, or any other document to make up 100 points of identification as per the student enrolment application.
- b) For future students enrolled in VET student loan courses, AIAC will need to collect the student's Tax File Number (TFN).
- c) The Unique Student Identifier (USI) from relevant students and staff as required by the Australian Government, unless an exemption applies under the Student Identifiers Act 2014.
- d) AIAC will book student CASA exams through the Assessment Services LTD website on behalf of the student. This will require AIAC to login with a personal login to book exams.
- e) Any student or staff feedback to the flight school, AIAC will record the individual's information if provided in the feedback form.
- f) For any external training, seminars or conferences booked by AIAC, AIAC will need to collect registration details from its staff.
- g) As part of the application for employment process, AIAC will collect personal information that has been provided in the application form which may include; contact details, employment history, education details and qualifications.
- h) AIAC may also need to collect sensitive information from staff or students such as; medical history, criminal history, etc. if it is necessary for their role. This may also include information from third parties (previous employees, references etc.).
- i) When interacting with AIAC through social media, AIAC may collect names, photos and any other publicly posted information for marketing purposes.

AIAC will only collect personal information that is reasonably necessary for, or directly related to, one or more of its services or activities as listed below:

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- a) Flight training and other flight services.
- b) To manage complaints, alleged misconduct, professional development requests, and other forms/procedures within the scope of the school or business.
- c) To monitor compliance with regulations and to identify, investigate and take action in relation to the contravention of those regulations.
- d) To enable AIAC to consult with stakeholders in order to consider, determine and apply policies and procedures.
- e) To cooperate with domestic and foreign law enforcement agencies and other regulatory bodies.
- f) To manage employees, clients, contractors, service providers and students.
- g) To allow users to gain access to online tools and systems, including but not limited to, the AIAC intranet.
- h) In order to celebrate certain milestones/achievements in your career/study, AIAC may ask you to take part in other photographic opportunities for company literature, or for publishing aforementioned achievements on social media, the AIAC website or other marketing material.

### 1.1 Consent

Unless otherwise notified in writing, AIAC will assume that staff and students consent to the collection of personal information provided to AIAC, either directly or indirectly, for the use of and disclosure by AIAC in accordance with this PIPP. For students, completing the enrolment application and signing the student contract is considered as the student accepting and agreeing with all AIAC policies and procedures. AIAC will only collect sensitive information (information regarding health, religion etc.) from staff or students with written consent from the staff member or student where it is necessary for AIAC to carry out or provide services/activities.

Information on knowing your rights regarding privacy can be found at:

- [http://www.lawstuff.org.au/nsw\\_law/topics/privacy](http://www.lawstuff.org.au/nsw_law/topics/privacy)
- <https://www.oaic.gov.au/individuals/.../australian-privacy-principles>
- <https://www.oaic.gov.au/privacy-law/rights-and-responsibilities>


### 1.2 How AIAC collects personal information

Personal information is collected by AIAC from individuals or from an authorized representative/agent. In some instances, it may be required that AIAC will collect personal information from third parties such as:

- a) Information collected from third parties about individuals that are the subject of reports of misconduct made to AIAC.
- b) Information collected from third parties relating to compliance issues.
- c) Information collected from airlines to whom the individual is contracted to or enrolled through.
- d) Information provided from third parties to AIAC in the course of its registration, licensing or any other statutory purposes. These functions may include personal information about individuals, information gathered from curriculum vitae, tender documents or any other documents required for the normal operations of the flight school.
- e) Interviews, student/staff briefings or general conversation

Agencies have a general obligation under the Australian Privacy Principles (APP) to inform individuals when they collect personal information about them from third parties. However, AIAC may occasionally collect information from third parties without notifying the individual due to one or more of the following exemptions;

- I. AIAC expects that the individual would have consented to the collection of the information.
- II. AIAC is required or authorized to collect the personal information from third parties by law.
- III. In some cases, it may not be reasonable for the individual to know about the personal information collect through a third party by AIAC because, for example, it may relate to a student's course report.

	<b>Australian International Aviation College</b> <b>Personal Information &amp; Privacy policy</b> <b>Quality Control supporting document</b> <b>AIAC-QHS-PP-004_v1</b>	Page 3
		VERSION: 1
		01-Mar-2021

### 1.3 Anonymity

The Australian Privacy Act requires organisations to allow individuals the option of not identifying themselves or handing over their private information. AIAC acknowledges this right and provides the option to opt out of providing information. However, due to the nature of Aviation and Licensing there are circumstances when AIAC will not be able to allow this. Some examples are:

- Aviation Reference Number - An aviation reference number (ARN) is similar to a customer number and you'll need it to fill in most of our application forms.
- ASIC Students and some staff will be required to obtain an ASIC. This includes a Federal Police Check.
- AIAC will require the results from aviation medical examinations
- Pilot Licenses
- Previous and current student records or assessments
- Pilot log books
- Course enrolment forms
- VET student loans (when applicable).
- Employee wages and superannuation entitlements.

If providing personal information is a problem, the individual might need to re-consider their study to become a Pilot. AIAC cannot provide the adequate training required to complete our courses if information is withheld.

### 1.4 Consequences of not providing personal information

As stated earlier, it is an individual's right to decline a request for information. However, if information is withheld the following consequences might apply


- If a person's identity cannot be adequately substantiated an enrolment application might be declined
- Necessary documents and licenses to become a pilot can be refused
- Withholding information may be interpreted as a breach in safety obligations therefore flying refused
- Access to AIAC services and facilities may be refused.
- VISA applications could be delayed or declined
- Necessary CASA requirements for flying could be declined
- Course may not proceed.
- AIAC may not be able to adequately investigate or resolve complaints/misconduct made by individuals.
- Wages/superannuation may not be able to be paid.
- Employment may not be able to be offered to an individual.

### 1.5 Use of information

AIAC will only use personal information collected for the purpose for which it was collected. Information you provide can be used for the following:

- Booking CASA exams through the ASPEQ assessment specialist website
- Creating or Verifying a USI
- The provision of flight training services
- Handling of complaints or student misconduct
- Co-operate with various stakeholders directly relating to the successful completion of your course
- Co-operate with government requirements and agencies such as CASA, CRICOS, VISA, DIBP and other regulatory bodies where required
- Photos and comments may be used for social media or other marketing purposes (a media release form is available for students and staff).
- Fulfil all administrative functions required to complete courses

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	<b>Australian International Aviation College</b> <b>Personal Information &amp; Privacy policy</b> <b>Quality Control supporting document</b> <b>AIAC-QHS-PP-004_v1</b>	Page 4
		VERSION: 1
		01-Mar-2021

- To provide student support services
- Communicating college events, activities, safety and operational notices
- Reporting through PRISMS
- To validate a person's identity
- Monitor course progress

### 1.6 Disclosure to other bodies (third parties)

At times, AIAC will be required to disclose personal information to third parties or with our parent company. These could include:

- Financial sponsors
- Department of Home Affairs
- Hospitals and other health related clinics and support services
- CASA
- ASQA
- NCVET
- Law enforcement
- Emergency departments such Fire, Ambulance, SES
- Various other Government agencies (Taxation office, Foreign regulators etc.)
- Marketing organisations
- Applicants under the Freedom of Information act 1982
- Contractors appointed by the college to deliver any part of the course requirements

Where personal data is disclosed to third parties, it will be done so only to the extent necessary to fulfil the purpose of such disclosure. Personal information may be disclosed by AIAC under the following circumstances:

- The individual consents to AIAC using, or would reasonably expect AIAC to use, the provided information for different purposes.
- AIAC is required by law (domestic or foreign) to disclose personal information.
- AIAC is required to report to governing agencies such as CASA, ASQA, CRICOS regulator etc.
- AIAC reasonably believes that disclosing information is necessary for enforcement activities.

### 1.7 Storage and Security of Personal Information

Personal information is stored both electronically and through paper documents. Electronic files are stored in the FSM. AIAC takes all reasonable steps to ensure that the personal information collected is protected against misuse, loss, unauthorized access, modification, unauthorized use or disclosure. AIACs' intranet is password protected with varying levels of access privileges for accessing the IT systems as well as physical restrictions for hard copies of documents. Hard copies are locked in filing cabinets or other lockable storage.

### 1.8 Destruction of Personal Information

Refer to the Quality Data Control Policy, document no. AIAC-QHS-SD-000\_v1.

**USI:** AIAC is required to securely destroy any information collected for the sole purpose of creating or verifying a USI.

## 2 AIAC Website

When an individual visits the AIAC website, the service provider logs the following information for statistical purposes:

- IP Addresses
- Top level domain (i.e. .com, .gov, .org, .uk etc.)
- Cookies
- Email forms
- Links visited, pages viewed, referral pages
- Time and date of a visit
- Browser used

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h) Documents downloaded.

AIAC will not attempt to identify individuals or their browsing history except in the event of an official investigation where a law enforcement agency may need to inspect the service providers' logs.

## 2.1 Cookies

Cookies are small pieces of data that is exchanged between a website server and an individual's web browser. Occasionally AIAC may carry out activities on its website such as surveys which will require the collection of cookies. Where the server uses an external survey provider that uses cookies, the individual will be directed to the providers' website offering information on the use of cookies.

## 3 Access and Correction of Personal Information

The privacy act allows individuals to access, review and correct any information held by the college. The Freedom of Information Act 1982 also advises individuals of the process by which you can access, change or annotate records that contain personal information held by AIAC. See the Office Manager at the college to request access to your personal information or download the 'change or update details' form from the server.

## 4 Marketing

Use of personal information including (but not limited to) photos and names for the purposes of marketing will be managed by the RCO. An individual's name, photo or other identifying information can only be used in marketing if the individual has agreed to release that information using the Media release consent form (AIAC-HR-FRM-008\_v1) available online at <https://www.cognitofrms.com/AIAC1/mediareleaseconsentform> or via the company Sharepoint page.

## 5 Links to Additional Privacy Information.

- <https://www.legislation.gov.au/Details/C2018C00016>
- <https://www.oaic.gov.au/freedom-of-information/foi-guidelines/>
- [http://www.lawstuff.org.au/nsw\\_law/topics/privacy](http://www.lawstuff.org.au/nsw_law/topics/privacy)
- <https://www.oaic.gov.au/individuals/.../australian-privacy-principles>
- <https://www.oaic.gov.au/privacy-law/rights-and-responsibilities>
- <https://www.legislation.gov.au/Details/C2018C00034>
- <https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/>

## 6 Review of policy and procedures

The Personal Information and Privacy policy and procedure will be reviewed 12 months from the date of implementation or after any significant change in regulation by the Compliance officer. The document map and control register (AIAC-QHS-RG-006\_V1) will be used to manage the review schedule.

Date implemented	15/03/2021	Review date:	01/03/2022
Authorised by:	D. Murray	New version no.	1

### 6.1 Amendments and Version history

Version no.	Amendment date	Amendment details	Amended by	Date of inclusion
1.0		Original document created and released	D. Murray	15/03/2021



## 7 Related Documents

- Personal Information and Privacy Policy-----AIAC-QHS-PP-004\_v1
- Personal Information and Privacy Procedure -----AIAC-QHS-PP-005\_v1
- Media Release Consent Form -----AIAC-SM-FRM-001\_v1
- Confidential Information Agreement (students)-----Enrolment confirmation
- Confidential Information Agreement (employees) -----Form 05
- Request to Change Details form -----AIAC-GA-FRM-005\_v1
- Student Register -----AIAC-QHS-RG-005\_v1
- Complaints Form-----AIAC-RTO-FRM-001\_V1
- Grievance Form Staff -----AIAC-HR-FRM-001\_V1
- Student Support Request Form -----AIAC-RTO-FRM-006\_v1
- AIAC Data breach preparation and response plan -----AIAC-QHS-PP-019\_v1
- AIAC Data breach reporting form 1-----AIAC-GA-FRM-001\_v1
- AIAC Data breach reporting form 2-----AIAC-GA-FRM-002\_v1
- AIAC Data breach register-----AIAC-GA-RG-001\_v1
- Quality Data Control policy -----AIAC-QHS-PP-006\_v1
- Quality Data Control procedure -----AIAC-QHS-PP-007\_v1