VFH PRIVACY POLICY AND PROCEDURE

SRTO Ref: Standard 5 – 5.1 – 5.4

Purpose
The Imperial College of Australia takes privacy very seriously and is committed to protecting the privacy of individuals. This includes personal, health, financial and other confidential information, which is necessary for the College to carry out its functions. The College will take all reasonable steps to protect individual information from loss, misuse or unauthorised disclosure or destruction. The right to privacy is a value that is highly regarded.

Responsibility
The CEO or the delegate will be responsible for ensuring that VFH student privacy requirements are understood and implemented by all staff in order to maintain the integrity and reputation of the industry as well as of the Imperial.

The College students’ personal information will be collected by fair and lawful means which is necessary for the purpose of enrolment and function of the College and is committed to ensuring the confidentiality and security of the information provided. This policy is issued in accordance with:

- The Higher Education support ACT 2003 (HESA)
- Privacy Act (2000)

When managing a student’s personal information, The College is required to comply with a number of different pieces of Government legislation and policy when governed the area of Privacy. These are:

- As required under Clause 23 schedule 1A of HESA, the information Privacy Principles set out in Privacy Act 2000 when managing personal information relating to VFH students under this policy; and

The College endeavours to balance the rights of privacy with the need to be accountable and transparent in its dealings. Certain information will not be available under Freedom of Information Laws. This includes private information relating to another individual, The College’s internal working documents and material obtained in confidence.

The College is collecting the personal information of students for the purpose of assessing eligibility for the VET FEE-HELP under the Higher Education Support Act 2003 and allocating a Commonwealth Higher Education Student Support Number (CHESSN). The College must comply with the information privacy principles relating to information obtained by the provider for the purposes of VFH assistance and repayment of VFH loans.

Collecting and Use of Information
The personal information supplied by individuals to The College will only be used to provide information about study opportunities, to enable efficient administration, and to maintain proper academic records. Only authorised managers and other authorised persons have access to this information. All the information collected is governed by the Privacy Act 2000.
The Imperial College of Australia collects personal information for:

- Statistical purposes for use by State and Commonwealth Administration
- Training purposes by The Imperial College of Australia
- General student administration; and
- VET administration and regulation.

**Personal information will not be collected by unlawful or unfair means.**

The Imperial College of Australia may use personal information for the following purposes:

- Planning
- Reporting
- Communicating
- Research
- Evaluation
- Financial administration (including debt recovery)
- Auditing
- Marketing purposes
- For any other purposes where the individual has provided consent for such use.

The College will not use the information without taking reasonable steps to ensure that, having regard to the purpose for which the information is proposed to be used, the information is accurate, up to date and complete.

**Storage and Security of Personal Information**

The College will act lawfully and as far as is reasonable and practicable in a fair and nonintrusive way. Wherever possible, it will collect information directly from its students rather than from third parties. The members and staff will do their best to tell students if The College collects information about them from a third party. Information will be collected and used in accordance with the privacy principles (see below) described in the legislation, which sets standards in relation to the collection, storage, use or disclosure of individual information.

When the College collects information it will advise of why it is being collected, and the law which requires it to be collected. The College will take reasonable steps to ensure that any personal information collected is relevant to the purpose for which it was collected, is up to date and complete. The College will take all reasonable steps to protect individual information from loss, misuse or unauthorised disclosure or destruction. To protect information from possible misuse The College may require that inquirers establish their identity before discussing individual information.

**Disclosure of Personal Information:**

Personal information about student(s) studying with The College may be shared with Australian Government and designated authorities, including the Tuition Assurance Scheme, ATO, and the Department of Education and Training.

The College is required to provide the Department of Education and Training, through the VET FEE-HELP student loan scheme, with student and training activity data. Information is required to be provided in accordance with the VET guidelines. The
Department may use the information provided for planning, administration, policy development, program evaluation, resource allocation and reporting and/or research activities. For these and other lawful purposes, the Department may also disclose information to its consultants, advisors, other government agencies, professional bodies and/or other organisations.

The College will not disclose the personal information of a student, except as permitted under these policies. The College will not disclose personal information to a person, body or agency (other than the individual concerned) unless:

- Individual concerned has expressly or impliedly consented to the disclosure in writing; or
- The person disclosing the information believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the student or of another person; or
- The disclosure is required or authorized by or under law; or
- The disclosure is reasonable necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue, or for the protection of the interests of the government, statutory authority or statutory office – holder as an employer; or
- The student is acquiring financial assistance from the Department of Human Services (i.e. Austudy, Abstudy or Youth Allowance). Therefore a student’s personal information entailing enrolment details is expected to be disclosed to the respective agency concerned.

The College will disclose information for the purpose of the protection of the public revenue. The Imperial College of Australia will include a note of the disclosure in the record containing that information. Personal information may be shared with other institutes where students enrol or apply to enrol.

For students who are under the age of 18 years; personal information, attendance details, progress and results may be disclosed to respective parent(s)/guardian(s).

When The Imperial College Of Australia releases information to a third party, it will advise the third party that they should not use the information for any purposes other than the purposes for which it was disclosed.

**Update of Personal Information**

The College will make all reasonable efforts to ensure that personal information recorded by The Imperial College of Australia is kept up to date. If a student believes that their personal information retained by The College is out of date or otherwise inaccurate, the student may amend personal information through The College student management system.

**Access to Personal Information**

The College policy allows students to apply for and receive personal information that The College holds about themselves according to the above requirements. The request should be lodged in writing, addressed to the Admissions Officer, providing full details of the Students' Name, ID Number And Details Of The Specific Information Required.

When the College does not believe the record should be amended, the student may request that a notation is placed on the record giving their version of how the record should be read. A student may access his or her own personal information held by The College at no charge. Individuals will be advised of how they may access or obtain a copy of their personal information and any applicable fees within 10 days of receiving their written request. Alternatively, The
Freedom of information Act 1982 provides for persons (including The Imperial College Of Australia students) to make an application for access to information (including personal information) held by The College to be amended if the person believes that the information is incomplete, incorrect, out of date or misleading.