

# Privacy Policy

## Purpose

This policy is to ensure that all information collected and used by MILCOM Institute is managed according to the Commonwealth Privacy Act 1988 and explains how personal information is collected, stored and managed by the RTO.

## Scope

This Privacy Policy will be made available to anyone free of charge and will be easily accessible for anyone who asks for it. It is available for easy download from the MILCOM Institute Web Site at [www.milcom.edu.au](http://www.milcom.edu.au). It may be viewed in alternative formats, if required, by contacting MILCOM Institute by letter, or email via the MILCOM Institute web site. MILCOM Institute endeavours to provide the policy in clear language that is easily understandable. The policy outlines how MILCOM Institute collects, uses, stores, and discloses personal information; and the purpose for which it requires personal information.

Personal information collected and stored about minors (clients under 18 years of age) will require written permission from a parent or guardian prior to it being supplied and stored.

Highly sensitive information about any client (adult or minor) should be discussed with the RTO prior to it being submitted and an arrangement for special handling and security should be agreed.

## Procedure

### Purpose of Data Collection

MILCOM Institute collects personal data from clients who apply for and enrol in training courses.

Some information is collected on behalf of State and Commonwealth Government Authorities, under legislative direction. This information is passed on to those authorities at their request and through official channels that ensures the privacy of personal information (see individual authorities privacy policies for details of their management of personal information)

MILCOM Institute also collects personal information to assist clients to apply for and study the most appropriate course for their needs and career aspirations.

Whilst studying at MILCOM Institute, personal information is held to ensure the safety, physical and emotional welfare of enrolled clients.

### Types of information collected

The following information is collected on behalf of the Commonwealth Government and is retained for the period of at least 2 years after the client graduates from their course or up to 30 years for information required to be kept under the *National Vocational Education and Training Regulator Act 2011*.

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It includes

- Name
- Address
- Contact details (telephone, email)
- Date of Birth
- Gender
- Country of birth
- Language spoken at home
- Level of English spoken
- Disability information
- Highest secondary schooling completed
- Other qualifications completed
- Current employment status
- Unique Student Number (USI)
- Victorian Student Number (VSN) - only for Victorian Students under 25 years of age
- Indigenous Status
- Residency status - for some government funding sources
- Health Care Card - for some government funding sources

This information is reported to the Commonwealth Government through the AVETMISS reporting system and other methods as directed by relevant Government authorities.

Additional information that may be held or used by MILCOM Institute and retained for the period of at least 2 years after the client graduates from their course or up to 30 years for information required to be kept under the *National Vocational Education and Training Regulator Act 2011* includes

- physical, intellectual or emotional disabilities or special needs that may be required to assist clients with learning and involvement with MILCOM Institute
- emergency contact details
- results of assessment and study progress
- complaints and appeals made by or against the client
- payment details (credit card and bank account details are not stored)
- Identification - used for enrolment and some assessment submissions

## **Method of collection and storage**

Date is collected during the enrolment process, through paper forms or on-line electronic enrolment processes. Information is transferred to the RTO's electronic student management system. Access to the student management system is provided to selected, highly trusted, MILCOM Institute's staff members via unique login and password. Data is either held on the RTO's internal server, or on a secure 'cloud based' storage platform provided by the provider of the student management system. Backup of the storage is provided on a secure server.

Clients are requested to advise MILCOM Institute of changes to their personal information to ensure that data held by the RTO is accurate and current.

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## **Management of Personal Information**

Personal information collected under Commonwealth Government regulations is submitted to the Government through the VET regulator, Australian Quality Skills Authority (ASQA), each year during February.

Information required by State Governments, such as State funding authorities and the Victorian Curriculum and Assessment Authority (for VSN - Victorian Student Number), is submitted according to the authority's nominated schedule; usually monthly.

Information collected during application and enrolment is used to assist clients to select a suitable course that will provide the outcomes they desire for their career goals.

Information stored about emergency contacts, medical conditions, disabilities and learning issues are filed securely in the RTOs electronic system with trusted nominated staff log-ins with passwords or in a locked filing cabinet in the RTO office. Information is shared with staff who require it to service the client needs. This information is not shared or passed to any third parties.

Personal information of clients is not shared or passed on to any marketing organisation or entities or overseas bodies. If sub-contractors or support organisation require personal information collected and/or stored by MILCOM Institute, the client will be approached to gain their permission to share the information.

Photos taken during training sessions or taken on-campus at the RTO's premises will not be publically displayed or used for promotional purposes without gaining written permission from the people displayed in the photo(s).

This Privacy Policy is binding to all staff directly employed by MILCOM Institute, contractors, sub-contractors, support personnel and organisations

## **Client Access to Records and Data**

Personal information held by MILCOM Institute on individual clients is made available to those clients. This includes all records relating to data collected for Government Authorities, information collected by MILCOM Institute for safety and educational purposes, records of complaints and appeals, other correspondence with the RTO, and records relating to academic progress.

Clients wishing to review their personal information held by MILCOM Institute should complete and submit a form to request access to personal information, outlining the type of information they wish to review. A suitable time and location will be arranged for the client to undertake the review. MILCOM Institute undertakes to process the application to review information within 5 days, or if a

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longer period is required, provide a written explanation of the reason for the delay and outline a process for the review to occur.

## **Corrections to Personal Information**

MILCOM Institute regularly requests clients to review their personal information held by the RTO and advise of appropriate corrections, updates, incomplete information, additional relevant information or changes to information that may be misleading. MILCOM Institute requests updates of personal information from clients at least every 12 months. Once advised of necessary corrections, the RTO will update information within 5 days.

## **Privacy Concerns**

MILCOM Institute encourages clients to raise any concerns they have regarding personal information handling practices by the RTO.

Complaints about the collection and management of personal information should initially be directed to MILCOM Institute by completing and submitting a Complaints Form. If the RTO is unable to resolve the complaint, the client may pursue the RTO's complaints process and have the complaint referred to an external mediation organisation.

The Privacy Act 1988 (Privacy Act) is administered by:

Office of the Australian Information Commissioner  
GPO Box 2999 Canberra ACT 2601  
Telephone: 02 9284 9800  
TTY: 1800 620 241 (no voice calls)  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Web: [www.oaic.gov.au](http://www.oaic.gov.au)

Please refer to the Office of the Australian Information Commissioner for further details on Privacy of Personal Information held by organisations.