



Privacy Policy

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1 PURPOSE

This *Privacy Policy* sets out the commitment of the Australis Business School ("Australis") to protecting the privacy of the information it collects about individuals, including staff, contractors, visitors, students and prospective students, in compliance with its legal and regulatory obligations. It demonstrates how Australis complies with the *Privacy Act 1988 (Cth)* as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and the National Code for Education and Training Providers to Overseas Students 2018.

This policy also explains how a person can see their personal information, make necessary corrections, and file a complaint if they think it was improperly obtained or handled.

2 SCOPE

The policy applies to all domestic and international students of Australis. It applies to all staff of Australis, including academic and non-academic staff, board and committee members, internal and external stakeholders, as well as independent contractors and consultants, when collecting and dealing with personal information on behalf of Australis. Any other person whose personal information Australis may occasionally acquire or keep is likewise covered by this policy.

3 DEFINITIONS

For definitions, refer to the *Australis Glossary of Terms*.

4 POLICY

4.1 Policy Statement

Australis acknowledges the responsibility to protect student, staff and stakeholder information. This policy ensures that Australis will collect, store, and handle personal data in accordance with the *Privacy Act of 1988* and the Australian Privacy Principles (APPs). These principles guide the manner in which Australis collects, uses, discloses, and protects personal information.

Australis is committed to making sure that all personally identifiable information that is gathered, used, or exposed is true, full, and current. Only the personal data required to deliver goods and services is collected.

Staff must be honest and forthright about the sensitive or personal data they obtain from a person and how that data is used. As part of its commitment to continual improvement, Australis does not gather information that is unrelated to any particular person and does not divulge personal information to outside parties for marketing reasons.

Information is protected against unauthorised access, loss, misuse, and unauthorised disclosure by reasonable means. If Australis no longer requires personal information for

any purpose for which it may disclose or use it, personal information will be permanently erased or de-identified.

4.2 Policy Principles

Every approach used by Australis to obtain personal data will be ethical and legal. Personal information will only be collected with care and used for necessary purposes. All personal data will be handled with confidentiality and kept private in compliance with this policy. Only where necessary and in compliance with this policy will personal information about individuals be disclosed to third parties.

All staff and student communications with Australis, including emails and phone conversations, may be monitored when necessary for security and conflict resolution. Personal data held by Australis will be accessible to staff and students as necessary.

5 COLLECTION OF PERSONAL INFORMATION

When Australis collects personal information, the individual will be informed of why it is required. Australis will only collect information required to fulfil its business functions, provide details of study opportunities, to enable efficient course administration, to maintain proper academic records, to provide access to Commonwealth funding (if applicable), ensure tuition fees are protected and, if required to report to government agencies as required by law. If an individual chooses not to give Australis certain information, then Australis may be unable to enrol that person in a course or supply them with appropriate information.

Sensitive information: This will only be collected when legally required or permitted. Australis will collect sensitive information only if the individual has consented to its collection and the information is reasonably necessary to Australis's operations and activities. Australis may also be required to collect such information by Australian law or a court or tribunal order.

Admission and enrolment application process: Australis will gather information such as name, address, date of birth, contact information, visa status, prior academic records, employment history, credit card details, parents' details, and emergency contact information when accepting admissions or enrolling students in a course of study. Information about health or disability may also be gathered when it is necessary to meet particular needs.

The Commonwealth Higher Education Student Support Number (CHESSN) and the Student Concession Number (SCN) may also be requested by Australis if doing so is necessary to administer financial aid eligibility, check enrolment eligibility, or otherwise authenticate a person's identification. Other government-related data may also be gathered, including tax file number (TFN), passport number, and confirmation of enrolment (CoE).

Recruitment of staff and generation of staff contracts: When a person is enquiring about or applying for a position, Australis will collect information such as name, date of birth,

address, contact details, educational qualifications and previous work history. Some additional information may be collected when Australis offers a position such as TFN, Australian Business Number (ABN), bank account details, superannuation details, visa status, Working With Children Check, Police Check and emergency contact details.

Collection of Information via Australis Website: Australis uses cookies and website analytics tools to improve the user experience and gather insights into how visitors use our website. These tools may collect information such as IP addresses, browser types, and browsing activity. This data is used solely for improving the website's functionality and enhancing marketing efforts. Visitors can opt-out of tracking by adjusting their browser settings or using the relevant opt-out features provided by third-party services. Australis is committed to ensuring that all digital data collection complies with Australian privacy laws, including the *Privacy Act 1988 (Cth)*.

6 QUALITY AND SECURITY OF PERSONAL INFORMATION

Australis endeavours to employ all rational measures to ensure that the personal data it gathers, utilises, or reveals is solely intended for its designated purpose and is precise, current, and comprehensive. All pertinent individuals will receive routine instruction on utilising the online resources for the purpose of updating their personal information. Verification of personal information will be conducted during communication in order to ensure the standard of quality. Australis is mindful about the importance of data security matters and treats personal data with the utmost care and respect. Reasonable steps are taken to protect personal information from unauthorised access, modification or disclosure. Access to personal information is secured and restricted. Sensitive personal information, such as health information, is secured through at least password protection and further protection as required.

7 USE AND DISCLOSURE OF PERSONAL INFORMATION

An individual's information will be used and disclosed for the primary purpose for which it is collected. The utilisation or revelation of an individual's personal data shall not occur for any other objectives, except with the individual's consent or if Australis is legally authorised or obligated to do so.

The utilisation or revelation of personal data will be carried out for the purpose of providing Australis's products, services, or activities, which may include admission, enrolment, evaluation, regulation, issuance of certificates of completion and Testamurs, among others. The utilisation or revelation of an individual's data is also necessary to conform with Australis's regulatory and legal responsibilities, which encompass the submission and revelation of information to government agencies at the Commonwealth, State and Territory levels for purposes of planning, evaluation, administration, and funding.

The utilisation or revelation of personal information is also intended for the execution of diverse management and administrative operations, including but not limited to billing administration, debt retrieval, personnel training, supervision of staff career advancement and work performance, quality assurance and assessment, testing and upkeep of information technology systems, seeking guidance from professional advisors and consultants, and management of legal claims and liabilities.

Personal information about students studying with Australis may be shared with the Australian Government and designated authorities, including the Tertiary Education Quality and Standards Agency (TEQSA), the Commonwealth Department with responsibility for administering the *Higher Education Support Act 2003*, or a Tuition Protection Scheme (TPS) manager (who in turn may disclose personal information to a replacement higher education provider or the Australian Government Actuary). This information includes personal and contact details, course enrolment details and changes, and in the case of international students the circumstance of any suspected breach of a student visa condition.

Australis will not knowingly share any personal information with any third party other than any service providers who assist Australis in providing the information and/or services Australis provides. Australis does not and will not sell or deal in personal information. Australis may use information gathered in a general sense without any reference to an individual's name to create marketing statistics, identify user demands and to assist it in meeting client needs generally. In addition, Australis may use the information that individuals provide to improve its website and online services but not for any other use.

Australis will not disclose an individual's personal information to another person or organisation unless:

- a) the individual concerned is reasonably likely to have been aware, or made aware, that information of that kind is usually passed to that person or organisation;
- b) the individual concerned has given written consent to the disclosure;
- c) Australis 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 individual concerned or of another person;
- d) the disclosure is required or authorised by or under law; or
- e) the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.

Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of the public revenue, Australis shall include in the record containing that information a note of the disclosure.

Australis will only disclose information to an overseas recipient if that disclosure relates to an individual's course containing an overseas component (study or practicum). Australis will take all reasonable steps to ensure that any overseas recipient complies

with the APPs. Overseas agents may collect information on behalf of Australis where an individual from a foreign country seeks to study in Australia.

Any person or organisation that collects information on behalf of Australis or to whom personal information is disclosed as described in this procedure will be required to not use or disclose the information for a purpose other than the purpose for which the information was collected by them or supplied to them.

8 RIGHT TO ACCESS AND CORRECT PERSONAL INFORMATION

Australis acknowledges the importance of clear communication with individuals regarding access to personal information, as it is necessary to gain trust and build relationships. Students and staff may access the personal information that Australis holds about them.

Different staff have access to different records. The Administration and Human Resources Manager is in charge of managing personnel records as well as student records, including grievance records.

Individuals have the right to access or obtain a copy of the personal information that Australis holds about them. Requests to access or obtain a copy of personal information must be made in writing. There is no charge for an individual to access personal information that Australis holds about them; however Australis may charge a fee to make a copy. Individuals will be advised of how they may access or obtain a copy of their personal information and any applicable fees within 10 working days of receiving their written request. Where it is reasonable to do so, access to the information will be provided in the manner requested by the individual.

If an individual considers their personal information to be incorrect, incomplete, out of date or misleading, they can request that the information be amended. Where a record is found to be inaccurate, a correction will be made as soon as practical. Where an individual requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment will be noted on the record. There is no charge for making a request to correct personal information.

Written requests for access to, to obtain a copy of, or correct personal information held by Australis should be sent to the Registrar at admin@asob.net.au.

9 STORAGE AND DISPOSAL OF PERSONAL INFORMATION

Australis is committed to ensuring the confidentiality, security and integrity of the personal information it collects, uses and discloses.

Australis will take all reasonable steps to ensure that any personal information collected either electronically or in hard copy is relevant to the purpose for which it was collected, is accurate, up to date and complete.

Personal information is stored only on approved Australis software. Employees are not permitted to store personal credit card information in any way. A password will always be required to access any personal information kept on a portable storage device (PSD). The PSD and the data it stores must be kept safe by device owners who are in charge of protecting personal information.

Any sensitive personal or health information that Australis is no longer required by law to keep will be permanently de-identified or destroyed in accordance with the governing legislation. Employees are not allowed to dispose of data that is necessary to fulfil a current request or data that might be needed during grievance or legal processes.

10 BREACHES AND COMPLAINTS

In the event of a data breach involving personal information that is likely to result in serious harm, Australis will notify affected individuals as soon as practicable. This is in line with the Notifiable Data Breaches (NDB) scheme under the Privacy Act 1988 (Cth). The notification will include details of the breach, the information involved, and recommended steps individuals can take to protect themselves. Australis will also notify the Office of the Australian Information Commissioner (OAIC) where required by law.

Individuals who believe Australis has breached the Australian Privacy Principles or this policy may lodge a formal complaint. Complaints must be submitted in writing to the relevant staff member and will be handled in accordance with Australis's *Staff Complaints and Appeals Policy and Procedure* or the *Student Complaints and Appeals Policy and Procedure*. Australis is committed to responding to privacy complaints promptly, with an initial response provided within ten (10) working days and resolution sought as soon as possible thereafter.

Any complaint about a breach of this policy will be considered by contacting the appropriate staff. Australis will address all complaints in accordance with the *Staff Complaints and Appeals Policy and Procedure* or the *Student Complaints and Appeals Policy and Procedure*.

11 Related Documents, External References and Version Control

11.1 Related/Referenced Documents

- Academic Documentation and Graduation Policy and Procedure
- Academic Integrity and Misconduct Policy and Procedure
- Admission and Student Selection Policy and Procedure
- Bullying, Discrimination and Harassment Prevention and Management Policy and Procedure
- Code of Conduct
- Facilities, Resources, ICT and Infrastructure Plan
- Marketing and Student Recruitment Policy
- Records and Information Management Policy
- Risk Register
- Staff Complaints and Appeals Policy and Procedure
- Student Academic Progression, Monitoring and Intervention Policy and Procedure
- Student Complaints and Appeals Policy and Procedure

11.2 Related Legislation and External References

- Higher Education Standards Framework 2021
- Privacy Act 1988 (Cth)
- Tertiary Education Quality and Standards Agency Act 2011
- Higher Education Support Act 2003

11.3 Version Control

Version	Date	Reviewed/approved by	Key notes/changes
1.0	07/11/24	Board of Directors	Updates to align to HESA requirements

11.4 Document Review

To be reviewed at least every five (5) years from the date of final approval.