

# Privacy Procedure

## Purpose

1. The purpose of this Procedure is to give effect to the Privacy Policy by explaining how personal information is collected, used, protected, destroyed and disclosed by GHE in carrying out its business.

## Scope

2. This procedure applies to:
  - a) all GHE staff, prospective and current students, and contractors working on behalf of GHE, including education agents;
  - b) all personal information (data and records) retained by GHE.

## Definitions

3. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

## Suite documents

4. This Procedure is linked to the Privacy Policy.

## Procedure

### Collection

5. Common activities where personal information will be collected by GHE include:
  - a) admitting students, including assessing the student's capacity to participate and progress in a course offered by GHE;
  - b) general administration, including transactions relating to fees;
  - c) staff recruitment processes;
  - d) promoting equity and diversity in the recruitment of staff and students;
  - e) ensuring students have access to support services;
  - f) grievance and appeals processes, including when GHE investigates potential breaches of relevant codes of conduct and policies;
  - g) conducting surveys to inform continuous quality improvement e.g. student surveys about their experience at GHE;
  - h) institutional reporting;
  - i) events and testimonials;
  - j) authenticating graduation certificates and testamurs;
  - k) GHE's legislative or regulatory obligations.
6. The personal information collected by GHE includes:
  - a) full name, contact details, date of birth, and gender;
  - b) banking and financial information;
  - c) information restricted by Law (such as Tax File Number);

- d) passport, migration and visa details;
  - e) full name and contact details of emergency contacts and next of kin;
  - f) photographs, videos and recordings;
  - g) feedback on a student's educational experience.
7. Personal information will be collected directly from the individual to whom the information relates, unless the individual has authorised collection of the information from someone else.
  8. GHE will collect personal information through a variety of methods, including online forms, direct interaction with individuals, security cameras, network use, or audio and video recordings of events.
  9. In the collection of personal information GHE will ensure that students and staff are:
    - a) appropriately notified; when
    - b) made aware of the purpose(s);
    - c) intended recipient(s);
    - d) whether it is required by law or is voluntary;
    - e) the existence of any right of access to and correction.
  10. Where consent is required for the collection of specific personal information, including audio-visual information at events, it must be:
    - a) on an informed basis;
    - b) freely and unambiguously given;
    - c) timely;
    - d) with the option to withdraw consent at any time;
    - e) with corrections able to be made;
    - f) relevant to the purpose;
    - g) not unreasonably intrusive;
    - h) provide the option for anonymity wherever possible.
  11. To protect the privacy of those affected by the collection of personal information (e.g., students or staff), when conducting surveys as part of continuous improvement, GHE will provide staff or students the opportunity to remain anonymous when participating in the survey and use de-identified information when analysing the data.

### **Storage and security**

12. GHE will store personal information securely according to requirements of the **Records and Data Management Policy**, for no longer than necessary, and securely disposed of.
13. Wherever possible, GHE will capture collected information and store it directly in an approved records and/or data management system, with the requisite access controls and security. Where this is not possible, staff must take all reasonable steps to ensure security and physical controls are exercised and transferred to the approved records and/or data management system as soon as possible.
14. GHE will take reasonable steps to protect personal information from misuse, interference, loss and from unauthorised access, modification or disclosure and unauthorised disposal. This includes:
  - a) training – conducting training and regular refreshers on physical and ICT security and the handling of personal information to all staff and contractors. The training includes information on the importance of not accessing personal information or databases unnecessarily, what would constitute misuse of personal information, identity authentication procedures, and on recognising and avoiding inadvertent disclosures when

for example verifying students' identity or publishing information on the GHE's website or Learning Management System.

- b) access – limiting access to personal information to those staff necessary to enable GHE to carry out its functions and regularly reviewing their access rights. Access rights are revoked from staff upon leaving GHE or changes roles such that the staff should no longer have such access rights.
- c) protection – to protect possible attacks on personal information stored electronically, using anti-virus and firewall software, and continuously monitoring servers for possible attacks, installing regular patches and updates, encrypting data and login details, and regular and multiple back-ups of data.

## **Disclosure**

- 15. Wherever possible, requests for disclosure by third parties should be in writing.
- 16. GHE will not disclose an individual's personal information unless the following situations apply:
  - a) the individual has given written consent to the disclosure;
  - b) GHE believes that disclosure is reasonably necessary to prevent or lessen a serious and imminent threat to the life or health of the individual;
  - c) disclosure is required or authorised by law,
  - d) 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.
- 17. GHE may also disclose personal information to the following:
  - a) government agencies, such as the Department of Home Affairs, Department of Education, Skills and Employment, Australian Tax Office, relevant Overseas Student Health Care Providers, Federal and state police, or the Tuition Protection Service.
  - b) authorised third parties involved in the delivery of educational or support services for a student as part of their course, such as a work-integrated learning host organisation, support services, or health services. In those instances, GHE will ensure that only necessary personal information for the purpose of the placement or service is disclosed.
- 18. Where personal information is to be disclosed reasonable steps must be taken to ensure its secure transfer.
- 19. A record of disclosures must be maintained in the records management system.

## **Access and correction**

- 20. Upon request from an individual, and after the individual's identity has been confirmed, GHE will provide to the individual their personal information.
- 21. GHE ensures the personal information of individuals it keeps is accurate, complete and up-to-date, and will correct the personal information when requested by the individual.

## **Use**

- 22. The use of information collected about an individual will only be used for the purpose for which it was collected.
- 23. Those authorised staff using records will take reasonable steps to ensure the information is accessed via a central database, that it is valid and accurate prior to its use.
- 24. Contact lists may only be used for the purpose explained to subscribers and for which consent was obtained.
- 25. Where a public register (such as graduate, staff, governance board membership lists) is maintained, individuals to whom the information relates should have the opportunity to request amendment or removal by contacting the Privacy Officer ([privacy@globalhe.com.au](mailto:privacy@globalhe.com.au)).

## Disposal

26. GHE retains and disposes of personal records in accordance with the **Records and Data Management Procedure – Records, Schedule One Records Retention and Disposal Authority**.
27. GHE will regularly review the personal information stored to determine if the information is still required.
28. If GHE determines the personal information is no longer required, GHE will destroy the information and it will not be retrievable or de-identify the personal information.

## Complaints

29. Complaints relating to personal information may be addressed in accordance with the processes set out in the **Human Resources Framework** (refer cl 173-6 grievance resolution) for staff or the **Student Complaints and Grievances Procedure** for students.

## Roles and responsibilities

30. The Board of Directors is responsible for the oversight and governance of this Procedure.
31. The Operations Director is responsible for:
  - a) the proper handling of personal information;
  - b) regularly reviewing the database used to store personal information and assessing the robustness of the database's security to ensure personal information is protected;
32. The Operations Director is the nominated Privacy Officer for GHE. The Privacy Officer is responsible for:
  - a) providing assistance to the GHE community regarding privacy matters;
  - b) acting as the first point of contact for privacy matters including applications for access to personal information held by GHE.
33. The Manager, Quality and Compliance is responsible for:
  - a) ensuring compliance with this Procedure;
  - b) ensuring that staff and students are adequately notified of the existence of this Procedure;
  - c) benchmarking GHE policy and standards with those adopted elsewhere in the tertiary sector;
  - d) the monitoring of information available from reviewing records relating to the implementation of this Procedure;
  - e) all records management arising from this Policy and Procedure.
34. Staff with access to personal information will respect the privacy of the personal information that is stored and will limit their use of personal information to the performance of specific functions.
35. All staff are responsible for becoming familiar and complying with this procedure and the related procedures.

## Associated information

<b>Related Internal Documents</b>	Privacy Policy Human Resources Framework Records and Data Management Policy Student Appeals Procedure Student Complaints, Grievances and Appeals Policy Glossary of Terms
<b>Related Legislation, Standards and Codes</b>	<i>Tertiary Education Quality and Standards Agency Act 2011</i> <i>Education Services for Overseas Students (ESOS) Act 2000</i> <i>Higher Education Standards Framework (Threshold Standards) 2021</i> <i>Higher Education Support Act 2003</i> <i>National Code of Practice for Providers of Education and Training to Overseas Students 2018</i> <i>Privacy Act 1998</i> <i>Australian Privacy Principles</i>
<b>Date Approved</b>	17 September 2021
<b>Date of Effect</b>	17 September 2021
<b>Date of Review</b>	June 2026
<b>Approval Authority</b>	Board of Directors
<b>Policy Custodian</b>	Chief Executive Officer
<b>PinPoint DocID</b>	3019

## Change history

<b>Version Control</b>	Version 1.1	
<b>Change Summary</b>	1-Sept-21	V1.0 Draft approved by Board of Directors 17-Sept-21
	10-Oct-23	V1.1 administrative updates following TEQSA registration

Warning - Document uncontrolled when printed! The current version of this document is maintained on the GHE website at <https://www.globalhe.edu.au/policy>