

# **Privacy Policy and Procedure**

## 1 Purpose and Objective

1.1 IIBIT is committed to protecting the privacy of individuals who interact with any aspect of our business, and will handle personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) in respect of the collection, use and disclosure of personal information from individuals.

# 2 Scope

2.1 This Privacy Policy applies to the collection, storage, use and disclosure of personal information by IIBIT. It also sets out information about how IIBIT may give access to personal information.

## 3 Policy

3.1 IIBIT will ensure it operates consistently with the Australian Privacy Principles and only collect the personal information that is necessary for the conduct of its business, and that it will use that information in the manner for which it was intended. Records Management policy outlines on retention and disposal of personal information that IIBIT holds.

#### Purpose of collecting and holding personal information

3.2 IIBIT collects and holds personal information for the purpose of providing educational products and services and requests information to manage and administer those products and services. When IIBIT collects personal information about individuals who are not students, IIBIT generally does so for the purposes for which the information was provided. All appropriate personal information will be held by IIBIT to satisfy record-keeping obligations.

#### 4 Information Collection

#### **Students**

- 4.1 When enrolling into a course of study, IIBIT will collect personal information such as name, address, contact details, date of birth, citizenship, educational history and prior academic results, work history (if required as a basis of admission), emergency contact details and credit card details. Additional information may be collected during a course of study and dealings with IIBIT.
- 4.2 IIBIT may collect other personal information which may identify racial or ethnic origins (including proficiency in languages other than English), information about health or disability (where this is relevant to accommodating specific needs) and membership of professional or industry associations (where required as a basis of admission or for credit transfer/recognition of prior learning).

- 4.3 IIBIT may collect government related identifiers, such as a passport number, Confirmation of Enrolment (COE) number, which may be necessary to verify a person's identity, to confirm eligibility for enrolment.
- 4.4 IIBIT may collect personal information because it is required to do so by laws that require IIBIT to report to Commonwealth, State and Territory government agencies such as:
  - a) Australian Skills Quality Authority (ASQA)
  - b) Director of Tuition Protection Services (TPS)
  - c) Department of Home Affairs (DHA)
- 4.5 IIBIT may collect personal information from other educational institutions where necessary to verify qualifications and course credits for enrolment and assessment purposes from education agents.
- 4.6 Communications with IIBIT may be monitored (including emails, telephone) for security and dispute resolution purposes, where it is lawful to do so.

#### Employees, contractors and staff

- 4.7 When making an enquiry about or applying for a position with IIBIT, the following information may be collected: name, home address, educational and work history and contact details (including telephone, fax and personal email address).
- 4.8 Information may be collected from third parties such as referees. When providing contact details of referees, consent is being given to IIBIT to collect personal information from the named referees.
- 4.9 When IIBIT is proposing to offer an employment position, additional personal information may be collected, such as date of birth, tax file number, emergency contact details, ABN (if relevant), bank account, superannuation information, visa, passport and licence details (if relevant), qualification information, awards, publications, copies of transcripts and details relating to working with children and police checks.
- 4.10 During employment with IIBIT other personal information may be collected, including records of work performance, medical certificates, nationality, membership of a professional or industry association, overseas health cover and information concerning any disputes relating to employment.
- 4.11 Staff will have access to all information we hold on them, and we will store and use the information appropriately and limit access to only those who have legal reason to have access to that information, or whom the staff member has given permission to.

#### **Security of information**

- 4.12 IIBIT maintains personal information in paper-based and electronic records and systems. Personal information may be collected in paper-based documents and converted to electronic form for storage (with the paper-based document either being archived or securely destroyed).
- 4.13 Archived records are stored at an external storage facility in Australia and information

- held in electronic form is generally held on servers controlled by IIBIT in Australia.
- 4.14 IIBIT uses physical security, password protection and other measures to ensure that all personal information is protected from misuse, interference and loss; and from unauthorised access, modification and disclosure.

#### Use and disclosure of personal information

- 4.15 IIBIT uses and discloses personal information for the purposes disclosed at the time of collection, or otherwise as set out in this Policy. Personal information will not be used or disclosed for any other purposes, unless consent has been given or IIBIT is authorised or required to do so by law.
- 4.16 Personal information will generally only be used or disclosed as follows:
  - a) to provide the products, services or information requested from IIBIT (including enrolment, assessment and issuing certificates of completion and testamurs);
  - b) personal information may also be disclosed to third parties (where applicable) to assist IIBIT with functions such as recruitment of students, work integrated learning placements or providing overseas student health cover;
  - c) to register and administer events, promotions or competitions;
  - d) to verify personal information details upon request from third parties, such as completion of courses, a request from a potential employer verifying a qualification and further enrolment into another institution;
  - e) to comply with IIBIT's legal and regulatory obligations, including disclosure and reporting to Commonwealth, State and Territory government agencies. This may include disclosure to government agencies with responsibility for administering immigration and student visa arrangements (including disclosure of suspected breaches of student visa conditions);
  - f) to assist IIBIT to make its sites, service and products more accessible and valuable to students; and
  - g) to perform various administrative or management functions including administering billing and debt recovery; training of staff and contractors and managing their work performance and career progression, quality assurance and evaluation; maintenance and testing of information technology systems; obtaining advice from consultants and professional advisers; management of legal liabilities and claims (including liaising with legal representatives and insurers).

#### **Direct Marketing**

4.17 IIBIT uses and discloses the personal information it collects for direct marketing purposes. Individuals may contact IIBIT to request not to receive direct marketing communications. Direct marketing may include providing individuals with information regarding products, services and new developments. If an individual does not wish to receive marketing material, please note IIBIT will still contact them in relation to the ongoing relationship. For example, IIBIT will still send individuals invoices and information that are relevant to their course of study.

#### Disclosure of information to overseas recipients

4.18 IIBIT does not typically or routinely disclose personal information to overseas recipients. Unless consent has been given, or an exception under the Australian Privacy Principles applies, IIBIT will only disclose personal information to overseas recipients where reasonable steps have been taken to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information. In circumstances where information is disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which IIBIT operates.

#### **Access and Correction of Personal Information**

- 4.19 For simple enquiries regarding personal information (such as confirming current contact details or confirming results) please contact the relevant Student Services team.
- 4.20 To request access to personal information my do so by request in writing, please contact IIBIT's Student Services at StudentServices@itpeg.edu.au. In limited circumstances, access to personal information may be declined in accordance with the Australian Privacy Principles.
- 4.21 IIBIT endeavours to keep all personal information accurate, up-to-date and complete; however, if information held by IIBIT is considered to be inaccurate, out-of-date, incomplete, irrelevant or misleading, a request can be made for a correction of the information.
- 4.22 Please contact IIBIT student services at StudentServices@itpeg.edu.au . After receiving such a request, IIBIT will take reasonable steps to correct the information
- 4.23 A request to remove or delete personal information may not be possible to comply with where the personal information must be retained by IIBIT for a period specified by applicable legislative and regulatory requirements.
- 4.24 IIBIT may refuse a request to access, correct or delete personal information in certain circumstances. In such instances, IIBIT will provide a reason for the decision.

## The Australian Privacy Principles (APP)

4.25 IIBIT abides by the Australian Privacy Principles (APPs) and will not pass on students or other staff information to third party in any way what may be considered as breach of the Australian Privacy Principles. For more information please visit:

http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles

## **Enquiries and Complaints**

4.26 All privacy enquiries and complaints should be directed in writing to the IIBIT student services using the Request for Access to Personal Information form. IIBIT will respond to a complaint within a reasonable period of time. The contact details for IIBIT are:

Student services

IIBIT

Ground floor, 841 George Street

Sydney

NSW 2000 www.iibit.edu.au StudentServices@itpeg.edu.au

4.27 If IIBIT's response to a complaint is unsatisfactory or it is believed that IIBIT may have breached the Australian Privacy Principles or the Privacy Act, a complaint can be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

### 5 Review

5.1 A review of this policy and its associated procedures is undertaken annually by the Chief Executive Officer.

# 6 Roles and Responsibilities

6.1 The Chief Executive Officer is responsible for the control and issuance of this policy.

### 7 Definitions

APP Australian Privacy Principles

NPPs National Privacy Principles

Personal information Information or an opinion about an identified individual or

an individual who is reasonably from the information or opinion. The information or opinion does not have to be

true or recorded in a material form.

# **8** Associated Information

Related Documents  Related Legislation	<ul> <li>Complaints and Appeals Policy and Procedure</li> <li>Records and Data Management Policy</li> <li>Student Handbook</li> <li>Staff Handbook</li> <li>USI Policy and Procedure</li> <li>Privacy Act 1988</li> <li>Privacy Amendment (Enhancing Privacy Protection) Act 2012</li> </ul>	
	<ul> <li>Standards for Registered Training Organisations (RTOs)</li> <li>2015 – standard 8</li> </ul>	
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# 9 Change History

Version Control	Version 3.1		
Change Summary	V1 26/08/14	Overall review	
	V2 25/02/15	Overall review	
	V3 03/05/17	Formatting	
	V3.1 18/07/19	Applied new template, plus minor editorials,	
		GMASQA Approved	