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Related documents	<i>Academic Documents Policy Bullying, Discrimination and Harassment Policy Disability Policy Information Management Security Policy and Protocols IT Acceptable Usage Policy Records Management Policy and Procedures Student Code of Conduct Policy Staff Code of Conduct Policy Student Information Protection and Access Policy Student Performance Data Policy and Procedures Student Equity, Diversity and Fair Treatment Policy Whistleblower Protection Policy and Procedures</i>

1. Purpose

This document sets out the Analytics Institute of Australia (AIA) policy on protecting the privacy of the information it collects and holds about individuals, including students, prospective students, staff, contractors, and visitors.

The objectives of the policy are to ensure compliance with the:

- Australian Privacy Principles in the Privacy Act 1988
- Privacy Amendment (Private Sector) Act 2000

2. Scope

This policy applies to:

- All AIA employees
- All volunteers, consultants, contractors, title holders and agents of AIA when collecting and/or dealing with personal information on behalf of AIA.

3. Definitions

Information: Information in electronic or hard copy form, including written records, photographs, images, video or audio footage, and health information.

Personal information: Any information that identifies an individual, whether recorded in a material form or not and whether true or not. Personal information that is commonly collected by AIA may include:

- Name
- Address (residential, postal and email)
- Phone number

- Date of birth
- Gender
- Citizenship
- Ethnic origin
- Passport and visa details
- Banking and credit card details
- Tax file number
- Emergency contact details
- Photographs or video recordings, including CCTV footage
- Student application forms and supporting documentation
- Student CHESSN and/or USI numbers associated with HELP loans
- Academic records, transcripts, enrolment data and assessment details
- IT access logs
- Learning Management System access logs
- Metadata from use of online services and facilities
- Records of donations and transactions
- Social media account details
- Information regarding use of AIA 's website, social media platforms/pages, products and services.

Sensitive information: As defined in the Privacy Act 1988 is:

Information or an opinion about an individual's:

- Racial or ethnic origin; or
- Political opinions; or
- Membership of a political association; or
- Religious beliefs or affiliations; or
- Philosophical beliefs; or
- Membership of a professional or trade association; or
- Membership of a trade union; or
- Sexual orientation or practices; or
- Criminal record
- Health information about an individual; or

- Genetic information about an individual that is not otherwise health information; or
- Biometric information that is to be used for the purpose of automated biometric verification of biometric identification; or
- Biometric templates

4. Principles

Collection of Information

- When collecting information AIA undertakes to inform the individual why it is required.
- AIA will not collect information unless it is reasonably necessary to enable it to:
 - Provide services to its students and to people enquiring about study at AIA
 - Process applications for enrolment
 - Facilitate the recruitment of staff and the creation of staff contracts
 - Communicate with students and staff
 - Maintain appropriate academic and financial records
 - Perform other internal administrative functions
 - Maintain contact with AIA alumni
 - Provide required data to Commonwealth and State government departments and professional authorities to comply with AIA 's legal requirements.
- AIA collects sensitive information only if the individual has consented to its collection and the information is reasonably necessary to its business or activities, unless required or permitted to do so by Australian law or a court/tribunal order.
- Before or at the time of collecting information from an individual, or where not practicable as soon as practicable after its collection, AIA will take reasonable steps to provide a Privacy Statement to the individual.
- Different personal information may be collected and held in different forms depending on how an individual interacts with AIA.
- If an individual contacts AIA for any reason, there may be a record of the person's name, address, email address, phone number, or other contact details kept.

Holding and Securing Personal Information

- AIA takes reasonable steps to protect personal information from unauthorized access, modification or disclosure.

- b. Except where required by law to be kept, personal information is destroyed or permanently de-identified when no longer required.
- c. Where personal data is stored digitally, it is located within Australia only, on site and in a secure back-up data base off campus.

Disclosing Personal Information

- a. Personal information is collected for AIA to carry out its obligations under contract with the individual from whom it was collected and may disclose the information, as required, in order to perform those functions.
- b. AIA will take reasonable steps to ensure that personal information is not disclosed to a third party except in certain permitted situations, including:
 - Where AIA has obtained the individual's consent
 - It is necessary to provide the information to a third-party who provides services to AIA
- c. Where disclosure is required or authorized by law or regulatory obligations, such as:
 - To the Australian Tax Office
 - Through PRISMS to the Department of Home Affairs
 - To Services Australia
 - Disclosing information required by the Higher Education Support Act 2003
 - Any other circumstance permitted by the Australian Privacy Principles.
- d. If it is identified an employee has breached the policy in regard to the use, security and protection of personal information held by AIA, they will be reported to the Chief Operating Officer. Following investigation of the incident and depending on the seriousness of the breach a decision will be made if discipline action is warranted. In serious cases there may be grounds for dismissal. The AIA Staff Code of Conduct policy refers

Use of Personal Information for Marketing Purposes

- a. AIA may use personal information for a range of purposes including:
 - i. The provision of information requested about the products or services AIA offers
 - ii. Contacting people who have expressed interest in receiving information about AIA through use of direct marketing and promotional materials, including the provision of information about new products or services, events and functions.
 - iii. From time to time AIA may also request participation in surveys or questionnaires to help AIA improve its levels of service and to maximize the opportunities and products it offers.

- iv. AIA may also send electronic messages with updates about products and services. This will only be done where consent has been given to receive them or it can be inferred from existing business or other relationship with AIA, and where there is a reasonable expectation of receiving those electronic messages. All electronic messages will identify AIA.
- v. Where a person no longer wishes to receive marketing information from AIA, a request to have it stopped can be made by phoning (to be provided) or by email to (to be provided). Within any marketing related emails there is an option to directly unsubscribe, by clicking on the 'unsubscribe' link. AIA will keep a record of such requests to ensure people do not receive that information in the future.

An Individual's Rights in Relation to Personal Information

- a. AIA takes reasonable precautions to ensure that the personal information collected is accurate, complete and current. It is important that students, staff and alumni ensure AIA is kept up to date with changes to their personal information, especially in regard to name and contact details.
- b. An individual has the right to request access to their personal information which AIA holds and to have it corrected at no charge if there is substantiated evidence of any errors.
- c. Current and previous students can view and update contact details through the Student Management System or by contacting Student Administration.
- d. AIA reserves the right to withhold personal information where its disclosure is restricted by law, is the subject of legal action, or may compromise the privacy of another person.

Breaches and Complaints

- a. If AIA staff or students become aware of an actual or suspected breach in the security of personal data held by the institution, whether it be due to unauthorized access, use, or modification, or other misuse, they must report it to the Chief Operating Officer. The COO must ensure that measures are taken to contain the breach and then report it to Chief Executive Officer. If on investigation it is found there has been misconduct by an individual or individuals, whether staff or students, they may be disciplined and if the breach is serious, dismissed from the institution, in accordance with the Staff and Student Code of Conduct policies.
- b. If an individual believes that AIA has not handled their personal information in accordance with the Privacy Policy, they may submit a complaint in writing to the Chief Operating Officer. The complaint should be lodged within 12 months of the individual becoming aware of the breach. Complaints will be processed

within 20 working days of receipt. The individual who submitted the complaint will be advised of AIA 's decision in writing along with any action taken.

5. Responsibilities

The Chief Operating Officer is responsible for maintenance and implementation of this Policy.

6. Legislation and Associated Documents

The following legislation and guidelines are relevant to this Policy:

- Australian Privacy Principles in the Privacy Act 1988
- Privacy Amendment (Private Sector) Act 2000

The following Standards in the Higher Education Standards Framework are relevant to this Policy:

- Registration - 2.1.2, 2.3.4, 2.4.4
- Accreditation - 3.1.2a-c, 3.3.2, 5.4.1

Version History

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