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Relevant documents	<i>Critical Incident Policy</i> <i>Graduation and Certification Policy</i> <i>Information Management Security Policy</i> <i>Student Grievance and Resolution Policy and Procedures</i> <i>Records Management Policy and Procedures</i> <i>Privacy Act (1988)</i> <i>Higher Education Standards Framework (Threshold Standards) 2015</i> <i>Tertiary Education Quality and Standards Agency Act 2015 (TEQSA Act)</i> <i>*as amended from time to time</i>

1. Overview

- a. Analytics Institute of Australia (AIA) recognises its responsibility to collect, manage and disclose student information in accordance with relevant legislation and guidelines and prevailing community expectations.
- b. The Privacy Act (1988) Australia regulates the way in which organisations collect, use, disclose, keep secure and allow people access to their personal information. AIA affirms the 13 Australian Privacy Principles (APP) from schedule 1 of the Act and will respect the dignity and privacy of all individuals with whom it is engaged.

2. Purpose

- a. This Policy establishes a framework for the management and handling of student information and records which protects the privacy of students and promotes the responsible handling of student information by staff.
- b. This Policy also establishes procedures through which a student may access his or her personal information, or make a complaint in respect to the loss, misuse, or unauthorised disclosure of, or unauthorised access to, information about them.

3. Scope

This Policy applies to student records and information relating to applicants, current and former students.

4. Guiding Principles

- a. Student information will be collected, stored, used, and disclosed only where it is necessary to carry out one or more legitimate functions or activities of the AIA.

- b. The AIA will take all reasonable steps to ensure responsible handling and management of student information in accordance with the *Records Management Policy and Procedures*.
- c. The AIA will take all reasonable steps to protect student information from misuse, loss, unauthorised access, modification, or unauthorised disclosure.
- d. Student information should be treated as confidential, and should not be disclosed to other persons except:
 - staff who have been authorised to do so because they have a demonstrated need for this information to carry out their duties; or
 - where disclosure is permitted under the provisions of this Policy.
- e. In certain circumstances, the confidentiality requirements in this Policy will be overridden by legal or legislative obligations of disclosure.

5. Collection, storage, use and disposal of Student Information

- a. The AIA collects and stores a range of information about its students. This includes personal information, academic records, and sensitive information. Some information is collected from students, while other information is generated by the Institute during its activities (e.g. assessment results and grades)
- b. AIA will collect personal information directly from a student wherever possible.
- c. Where information is collected, all reasonable steps will be taken to inform students of:
 - the purpose for which the information is collected
 - any law or legal authority that requires or authorises information to be collected or disclosed to a third party, and
 - any third party to whom AIA usually discloses the student information that is being collected.
- d. AIA will take all reasonable steps to:
 - ensure that student information is accurate, relevant, up-to-date, complete, and not misleading
 - adequately protect student information that it collects and stores to prevent misuse or unauthorised access or disclosure of the information.
- e. Staff responsible for the management of sensitive information about a student must ensure this information is stored and managed securely and confidentially.
- f. Legitimate purposes for which information may be used, include but are not limited to:
 - the administration of admission, enrolment, and class registration
 - the administration of course completions and award conferrals
 - course and topic administration
 - administration of prizes and scholarships

- student retention and academic progress matters
 - communication with students
 - the Institute 's internal planning purposes
 - the provision of student services including health and well-being programs
 - provision of associated services such as security, parking, and information technology
 - arrangement of work-integrated learning placements
 - conduct of student elections
 - administration of student fees and charge
 - fostering alumni relations
 - verification of student records for employers or external bodies with legitimate reasons for checking the academic credentials of students, and
 - mandatory reporting to government departments and agencies under Commonwealth and State legislation.
 - provision of information to current and former students and applicants about Analytics Institute of Australia's courses, activities, and programs
- g. Where student information has been obtained for one or more legitimate purposes, it will not be used for any other purpose, unless:
- the individual concerned has consented to its use
 - use of the information is required by law, or
 - AIA believes it is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned, or another person.

6. Staff access

- a. Staff access to student information will be restricted to those staff members who require the information to carry out their duties and responsibilities.
- b. Staff who are granted access to student information will only use that information for legitimate purposes and activities, in accordance with this Policy and the scope of their duties and responsibilities.
- c. Staff requesting access to student information, held electronically, must acknowledge their responsibility to maintain confidentiality of information.

7. Student access

- a. AIA will take all reasonable steps to allow individual students to view the information it holds about them.

- b. A student may directly view a limited amount of information about themselves which is held on AIA's Student Information System
- c. Requests to view additional information or documents held by AIA must be directed to the Registrar.
- d. Where access is granted, this information may only be viewed in the presence of a member of staff. A student will not be permitted to view any document which is marked confidential or which contains information on another student but will be provided with a brief description of any such document or with a copy of the document with information regarding other student(s) redacted/deleted.

8. Disclosure to third parties

Analytics Institute of Australia will not disclose information about students to persons, bodies or agencies outside the Institute including parents, spouses or other relatives or friends of the student, or to staff who have no need of the information, unless one of the following provisions apply:

a. Disclosure to third parties with the consent of the student concerned

Student information may be disclosed to third parties with the consent of the student concerned. Such consent should be given in writing. The consent should specify the extent and nature of the information the student agrees to disclose.

b. Disclosure under statutory or other legal authority in Australia

AIA is required under State and Commonwealth legislation to provide student information to the following government departments and agencies. It will take reasonable steps to inform students of the types of information that are usually disclosed or reported to government departments and external agencies:

- The Tertiary Education Quality and Standards Agency (TEQSA) established under the TEQSA Act (2015)
- The Australian Government department responsible for tertiary student support funding and programs, for reporting purposes and to enable the administration of Commonwealth student contribution, tuition fee and loans programs
- Centrelink, as required to enable verification of entitlement to Centrelink payments
- The Australian Taxation Office (ATO) on the liabilities of students who have elected to defer and repay costs incurred during their study under the range of Commonwealth loans and contribution programs
- The relevant Australian Government department (currently the Department of Home Affairs) responsible for student visa requirements in respect to relevant administrative information on student visas

c. Disclosure of information under court order

AIA must also provide information concerning a student if required to do so under a Court order.

d. Release of information to state or Federal Police

AIA may be required to release information to state or Federal police where a student is reasonably suspected of having committed a criminal offence or can assist in the prevention or solving a crime, or in the case of an emergency. Such requests must be directed to the Registrar who must confirm the identity and credentials of the person requesting the information and recommend release of information to the Registrar, except in case of an emergency where there is no time available for approval where the Registrar may make the decision.

e. Staff of an associated or affiliated institution or organisation

AIA may grant access to student information to staff of an associated or affiliated institution, who have a demonstrated need to access it in order to carry out duties relevant to the administration of admission or enrolment activities, course or topic administration or other relevant activities in connection with AIA students or prospective AIA students. Requests for access to student information should be directed to the Registrar who will review the request and approve further action as appropriate.

Access to student information to staff of an associated or affiliated institution or organisation will only be granted on the authority of the Registrar and will be limited to only that information which the Registrar considers appropriate to meet the need.

f. Verification of an academic record

- i Enquiries concerning a student's academic records from a person or body with a valid reason for seeking the information (e.g. another registered provider or a prospective employer who has been presented with transcript of academic record from the student) should be referred to the Registrar.
- ii Such requests must be in writing and include a copy of the transcript of academic record. On receipt of a request, the Registrar's Office will check the identity and credentials of the person or body making the request, and if appropriate, will verify the student's academic record.
- iii Where there is evidence that a student may have submitted to another educational institution, employer, or other person or body a falsified transcript of academic record, a formal report will be made to the Registrar. The report will include a copy of the falsified document, details of when and where this document was submitted, and a copy of the student's actual academic record. On receipt of the report the Registrar will investigate and write to the student or former student inviting them to respond to an allegation that they have falsified an official AIA document and undertake any additional investigation as appropriate.
- iv Where an allegation that a student or former student has falsified an official AIA document has been proven, the Registrar in consultation with the Academic Dean may take one of the following actions, taking into account, any statement or information presented by the student or former student, including any extenuating circumstances:
 - issue the student or former student with a formal warning about his or her conduct
 - approve the application of a sanction precluding the student or former student from further enrolment at AIA
 - refer the matter to an external authority

- v The Registrar will notify the student or former student of the outcome of the investigation.
- vi The above process will be in line with the AIA's policies on Academic Integrity, Graduation and Certification and the Student Code of Conduct

g. Serious and imminent threat to the life or health of a student or other person

AIA may disclose information about a student to the police, emergency services, an external health service provider, or nominated emergency contact person where there is a reasonable belief that disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the student or another person. Disclosure of student information in these circumstances will only be made by the respective Registrar.

h. Release of student information to contracted third parties

Where any staff needs to release student information to contracted service providers that the Institute uses to perform services on its behalf, release of student information must be approved by the Registrar and the contract must include provisions to protect the security and confidentiality of the student information.

i. Freedom of Information

AIA complies with the provisions of state and federal governments including Freedom of Information legislation. Any request for information concerning a student or a former student made under the terms of a Freedom of Information Act must be referred immediately to and be approved by the COO.

9. Correction of student information

- a. AIA will take reasonable steps to enable students to correct any inaccurate information held by the AIA as appropriate.
- b. Students who wish to correct personal information held by the Institute may correct certain details such as their address and emergency contact details directly via the Student Information System.
- c. Students who believe there is an error in other personal details (e.g. birth date, citizenship or residency status or name) should contact the Registrar and, where required, provide official documentation to support their request.
- d. A student who has a reasonable belief that there is an error or inaccuracy in other documents or records held with or issued by AIA about them or that is associated with them may make a written request, with documentary evidence if required, for a correction to be made to the document or record in question. Written requests for a correction to a document or record should be directed to the Registrar. A copy of the written request will be retained on the student's file.
- e. A student who has a reasonable belief that there is an error in an academic grade or result should raise his or her concern with the relevant Unit Convenor in the first instance.

10. Complaints regarding student information records

- a. Students may lodge a complaint about a breach of confidentiality, misuse or inappropriate disclosure of information held by AIA as detailed in the AIA's *Student Grievance, Resolution Policy and Procedures*.
- b. Where an investigation into a complaint establishes that there is a clear case that a staff member has deliberately disclosed or given unauthorised access to student information or breached student confidentiality or may be guilty of serious misconduct as a result of the misuse of student information, a recommendation may be referred to the Registrar to initiate disciplinary procedures under the Staff Code of Conduct.

Version history

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