Privacy Policy and Procedure

<table>
<thead>
<tr>
<th>Name of Policy</th>
<th>Privacy Policy and Procedures</th>
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<tbody>
<tr>
<td>Version</td>
<td>2.0</td>
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<tr>
<td>Comply with</td>
<td>Australian Privacy Principles</td>
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<tr>
<td>Department responsible</td>
<td>Operations and Compliance</td>
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<tr>
<td>Responsible person to monitor and interpret</td>
<td>Chief Operating Officer</td>
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1. Policy objective
The objective of this policy is to ensure that information collected for and by the Institute is within the Australian Privacy Principles (2014) (APPs) and the Freedom of Information Act (1982) and protected and utilised only in the light of its primary purpose.

2. Scope
In the course of its business, the Institute’s Privacy Policy and Procedure will be applicable from the date of the student’s enrolment at the Institute. The collected information will be either in electronic or in hard copy format. Implementation of the policy applies to all Institute staff and Training Representative (where applicable) staff who handle personal student information.

3. Responsibility
The Chief Operating Officer is responsible for the implementation of this policy and all departmental managers are responsible for ensuring that staff and students are made aware of its application.

4. Policy statement
4.1 The Institute takes privacy very seriously and is committed to protecting the privacy of individuals. This includes personal, health, financial and other confidential information which is necessary for the Institute to carry out its functions.
4.2 The Institute will take all reasonable steps to protect individual information from loss, misuse or unauthorised disclosure or destruction.
4.3 The Institute’s students’ personal information will be collected by fair and lawful means as necessary for the purpose of enrolment and other functions of the Institute with a commitment to ensuring the confidentiality and security of the information provided at all times.

5. Procedures
5.1 Managing personal information
When managing a student’s personal information, the Institute is required to comply with Government legislation and policy as mentioned above.
the Institute endeavours to balance the rights of privacy with the need to be accountable and transparent in its dealings. The Institute manages students’ personal information in an open and transparent way. However certain information will not be available under Freedom of Information laws. This includes private information relating to another individual, the Institute’s internal working documents and material obtained in confidence. In addition, the Institute’s Document and Record Register provides a framework and instructions to staff regarding how and why the Institute collects, stores and uses students’ personal information and how individuals may access their personal information, as well as procedure for making complaints about Institute breaches of the APPs and how the Institute will deal with a complaint.

5.2 Collection and use of information
The Institute will not collect personal information unless the information is reasonably necessary for one or more Institute functions or activities. Any personal information supplied by individuals to the Institute and/or its Training Representative (where applicable) will only be used to provide information about study opportunities, to enable efficient administration, and to maintain proper academic records. Only authorised managers and other authorised persons have access to this information. All information collected is governed by the APPs (2014).

The Institute collects personal information for:
- Statistical purposes for use by State and Commonwealth Administration
- Teaching purposes
- General student administration

The Institute may use personal information for the purposes of planning, reporting, communicating, research, evaluation, financial administration (including debt recovery), auditing, marketing, and for any other purposes where the individual has provided consent for such use.

The Institute will not use the information without taking reasonable steps to ensure that, while having regard for the purpose for which the information is to be used, the information is accurate, up-to-date and complete.
At or before the time or, if that is not practicable, as soon as practicable after the Institute collects personal information about an individual, the Institute will take steps to notify the individual about its intended use of the information. The Institute will not use or disclose the information for the purpose of marketing without prior written student consent.

5.3 Storage and security of personal information
The Institute and/or its Training Representative (where applicable) will act lawfully and, so far as is reasonable and practicable, in a fair and non-intrusive way. The Institute ensures that the personal information it collects is accurate, up-to-date, complete and relevant. Wherever possible, it will collect information directly from its students rather than from third parties. Institute staff will do their best to tell students if the Institute collects information about them from a third party. When the Institute collects information it will advise why the information is being collected, and the law which requires it to be collected. The Institute will take all reasonable steps to protect individual information from misuse, interference and loss, and from unauthorised access, modification or disclosure. If (a) the Institute holds personal information about an individual; and (b) the Institute no longer needs the information for any purpose for which the information may be used or disclosed by the Institute; and (c) the information is not contained in a Commonwealth record; and (d) the Institute is not required by or under an Australian law, or a court/tribunal order, to retain the information, then the Institute will take reasonable steps in circumstances to destroy the information or to ensure that the information is de-identified.

5.4 Disclosure of personal information
Personal information about student(s) studying with the Institute may be shared with Australian Government and designated authorities. This information includes personal and contact details, course enrolment details and changes and, for international students, the circumstances of any suspected breaches of the student’s visa conditions.

The Institute will not disclose any personal information about a student, except as permitted under these policies. The Institute will not disclose personal information to a person, body or agency (other than the individual concerned) unless: 
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- The individual concerned has expressly or implicitly consented to the disclosure in writing,
- The person disclosing the information 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 student or of another person,
- The disclosure is required or authorised by or under law,
  The disclosure is reasonably necessary for the enforcement of a criminal law, or a law imposing a pecuniary penalty, or for the protection of the public revenue, or for the protection of the interests of the government, statutory authority or statutory office holder, such as an employer; or
  The Institute will disclose information for the purpose of the protection of public revenue. The Institute will include a note of the disclosure in the record containing that information. Personal information may be shared with other institutes where students enrol or have applied to enrol.

For students under the age of 18 years, personal information, attendance details, progress and results may be disclosed to a respective parent(s)/guardian(s). Except in the case where information is released to a parent or guardian, when the Institute releases information to a third party it will advise the third party that it should not use the information for any purpose other than the purpose disclosed.

5.5 Correction and update of personal information
The Freedom of information Act 1982 and APPs (2014) provide for persons (including the Institute’s students) to make an application for access to information (including personal information) held by the Institute.

The Institute will make all reasonable efforts to ensure any personal information recorded is kept up-to-date. If a student believes that the personal information retained by the Institute is out-of-date or otherwise misleading or inaccurate, the student may request that the Institute amend their personal information and the Institute will comply with this request if it is found that the information is out-of-date, misleading or inaccurate.

If the Institute corrects and updates personal information about an individual that it previously disclosed to another education provider and the individual requests that the Institute notify the
other provider of the correction, the Institute will then take steps, as are reasonable in the circumstances, to give that notification unless it is impractical or unlawful to do so.

If the Institute refuses to correct the information as requested by the individual, the Institute will give the individual written notice that sets out: (a) the reasons for the refusal; and (b) the mechanisms available to complain about the refusal; and (c) any other matter prescribed by the regulations. In the case of refusal, if an individual requests the Institute to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, then the Institute will take reasonable steps in the circumstances to associate the statement in such a way that will make it apparent to users of the information.

If a request is made for correction or for associating a statement as mentioned above, the Institute will respond to the request within a reasonable period after the request is made. The Institute will not charge the individual for making the request, for correcting the personal information or for associating the statement with the personal information.

5.6 Access to personal information
The Institute policy allows students to apply for and receive personal information that it holds according to the above requirements.

A student may access their own personal information held by the Institute at no charge. The request should be lodged in writing, addressed to the Student Services Manager, providing full details of the student’s name, ID number and details of the specific information required.

Individuals will be advised of how they may access or obtain a copy of their personal information within 10 days of the Institute receiving the written request.

6. Revision history

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