

<p>Goulburn Ovens Institute of TAFE</p> <p>Policy no. E7 <small>(Copy on Web Site)</small></p>	<p>Title: Student information privacy policy Executive Management approved: 29/04/2009 <i>Reviewed: 13/07/2011, 29/10/2013, 12/06/2015</i></p> <p><i>Responsible officer: Manager Student Services</i> <i>Authorising officer: Human Resources Manager</i> <i>Review: Biennial (12th September 2015)</i></p>
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Student information privacy policy

1. PURPOSE

To protect the privacy, in relation to the collection, use, storage, security, disclosure and right to access personal information of all Goulburn Ovens Institute of TAFE (GOTAFE) students in accordance with the Information Privacy Principles (IPPs) of the Commonwealth Privacy Act 1988.

2. SCOPE

This policy applies to the collection, use, storage, disclosure of and access to personal, health and sensitive information collected by Goulburn Ovens Institute of TAFE in relation to past, present and prospective students of the Institute.

3. PRINCIPLES

In complying with the Privacy Act, 1988, GOTAFE shall meet the minimum standards for the collection, use and disclosure of personal information in the following manner.

3.1 Collection of information

GOTAFE shall only collect personal information that is necessary to carry out legitimate activities. Information shall be collected in a legal and just method and shall not, where reasonably possible, be intrusive.

If practical, personal information shall be collected from individuals.

When collecting personal information, GOTAFE shall take reasonable steps to inform the person about:

- The identity of this organization
- The purpose of collection
- Their rights to access Personal Information held by the organisation.

3.2 Use and disclosure

GOTAFE shall only use or disclose information for the primary purpose (original reason for information being collected), for which it was collected. GOTAFE shall not use or disclose information for a secondary purpose (any other purpose than the primary purpose) unless the individual has consented to the use or disclosure.

GOTAFE shall provide reasonable opportunity for an individual to opt-out of any activity that shall make use of their personal information.

GOTAFE may be requested to make personal information available to authorised Australian Commonwealth and State agencies when required. For example, personal information about international students studying with GOTAFE may be shared with the Australian Government and designated authorities, including the Tuition Assurance Scheme and the ESOS Assurance Fund Manager. This information includes personal and contact details, course enrolment details and changes, and the circumstance of any suspected breach of a student visa condition. Personal information may also be collected to assess an individual's entitlement to Commonwealth assistance under the *Higher Education Support Act 2003* and to allocate a Commonwealth Higher Education Student Support Number (CHESSN). GOTAFE will disclose this information to the Department of Education Employment and Workplace Relations (DEEWR) for these purposes. DEEWR will store the information securely in HEIMS or the VET FEE-HELP IT System. DEEWR may disclose information to the Australian Taxation Office. Personal information gathered for these purposes will not otherwise be disclosed without the individual's consent unless required or authorised by law.

GOTAFE social networking tools such as Moodle, forums and chat rooms may become public information due to their electronic form. GOTAFE recommends being cautious of disclosing personal information and discourages inappropriate communications.

3.3 Data Quality

GOTAFE shall take all reasonable steps to make sure that personal information is accurate, complete and up-to-date at the time of collection and use.

3.4 Data storage and security

GOTAFE shall take all reasonable steps to ensure personal information is suitably and securely stored including ensuring that appropriate filing procedures are in place.

GOTAFE shall take reasonable steps to ensure the security of physical files, computers, networks and communications are maintained at all times.

GOTAFE shall also ensure personal information is safe from misuse, loss, and unauthorised access, alteration or disclosure. Personal information shall be destroyed or de-identified when it is no longer needed for either the primary or approved secondary purpose.

The Institute uses the following operational systems for the collection and recording of student information:

Operational System	System Purpose	System Owner
QLS	Records student enrolment, Maintain student results, Processing Awards/Graduation	Registrar
SIRISI	Records student and other borrower details	Manager Information Access

FINANCE ONE	Record of personal details required to effect financial transactions	General Manager Business
Australian Multicultural Education Services (AMES)	Record personal details, course and results for Australian Migrant English Program (AMEP)	Divisional Manager - Services

3.5 Openness

GOTAFE shall make available, on request, our Privacy Policy. We shall also, on request and within reason, inform an individual of:

- The type of personal information collected and held
- The purpose for this information
- The method by which it is collected
- How it is used and disclosed.

3.6 Access and Correction

If requested, GOTAFE TAFE shall give individuals access to and correction of their personal information held by the organisation. If requested, a copy shall also be provided. This information is provided on the condition that none of the following exceptions apply:

- In the case of personal information other than health information - providing access would pose a serious and imminent threat to the life or health of any individual.
- In the case of health information - providing access would pose a serious threat to the life or health of any individual.
- Providing access would have an unreasonable impact upon the privacy of other individuals.
- The request for access is frivolous or vexatious
- The information relates to existing or anticipated legal proceedings between the organisation and the individual, and the information would not be accessible by the process of discovery in those proceedings.
- Providing access would reveal the intentions of the organisation in relation to negotiations with the individual in such a way as to prejudice those negotiations.
- Providing access would be unlawful.
- Denying access is required or authorised by or under law.
- Providing access would be likely to prejudice an investigation of possible unlawful activity.
- Providing access would be likely to prejudice the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
- The enforcement of laws relating to the confiscation of the proceeds of Crime.
- The protection of the public revenue.

- The prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct.
- The preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders by, or on behalf of, an enforcement body.
- An enforcement body performing a lawful security function asks the organisation not to provide access to the information on the basis that providing access would be likely to cause damage to the security of Australia.

3.6.1. When requesting access to personal information, individuals shall:

- Request to access their personal information formally in writing
- Provide two (2) acceptable forms to prove their identity
- Advise what format they require the information
- Provide data storage, if necessary
- Allow 14 working days for processing.

3.6.2. GOTAFE will provide individuals access to any personal information held about them free of charge. GOTAFE may choose to charge a fee to make a copy of personal information. Should a fee apply, it will not be excessive.

3.6.3. If an individual considers their personal information to be incorrect, incomplete, out of date or misleading, they can request that the information be amended by submitting the GOTAFE 'Student Personal Details Amendment Form' to the campus Administration Centre.

Where a record is found to be inaccurate, a correction will be made. Where a student requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment will be noted on the record.

3.7 Unique Identifiers

GOTAFE shall not assume, as its own identifier of a person, an identifier that has been assigned by:

- A Government agency or agent
- A contracted service provider for a Commonwealth Contract.

Please note: A person's name or ABN number is not considered to be an identifier.

3.8 Transborder Data Flow

GOTAFE shall only transfer personal information to a foreign company if:

- The foreign recipient has similar compulsory privacy limitations;
- The individual's permission has been gained.
- It is necessary to conduct business which involves the individual

3.9 Sensitive and Health Information

GOTAFE shall not collect personal information that is of a sensitive nature unless prior permission has been sought from the individual.

3.10 Publication

This policy will be made available to students and prospective students by publication on Goulburn Ovens Institute of TAFE's website and in the GOTAFE Student Diary.

To ensure that students have given their informed consent, regarding their personal information as outlined in this policy, GOTAFE will advise students on enrolment about these procedures and where they are located.

All GOTAFE staff are made aware of and trained in this procedure as part of the compulsory GOTAFE Online Induction Program.

4. DEFINITIONS

For the purposes of this policy, and in accordance with the VIPA and the HRA:

Consent	Express consent or implied consent.
Health information	Information or an opinion about a physical, mental or psychological health (at any time) of an individual; or a disability (at any time) of an individual; or an individual's expressed wishes about the future provision of health services to him or her; or a health service provided, or to be provided, to an individual – that is also personal information.
Individual	A client, or a prospective client of GOTAFE.
Personal information	Information or an opinion (including information or an opinion forming part of a database), that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, but does not include information of a kind to which Schedule 2 [of] the Health Records Act 2001 applies.
Primary purpose	Is the original reason for information being collected, At GOTAFE the provision of vocational education and training programs and services is the reason for the collection of personal information. This information includes enrolment identification information, tracking and reporting data, assessment information, recognition and award data, statutory statistical information, ethically approved research, internal marketing information.
Sensitive information	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 preferences or practices; or criminal record – that is also personal information.
Unique identifiers	An identifier (usually a number) assigned by an organisation to an individual uniquely to identify that individual for the purposes of the operation of the organisation. A GOTAFE

	identification number is allocated to each enrolled student.
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5. POLICY

Goulburn Ovens Institute of TAFE is committed to complying with the Information Privacy Principles as defined in the Commonwealth of Australia Privacy Act 1988.

All personal, sensitive and health information collected and held within the Institute will be held securely and used for the primary purpose for which it was collected and will only be provided to agencies for which it is collected, to enable the Goulburn Ovens Institute of TAFE to meet its statutory obligations.

Any information held within the Institute will not be used for a purpose other than the primary purpose for which it was collected without the individual's consent, unless the use or disclosure of the information is authorised by, or under law.

6. REFERENCES

Victorian Health Records Act 2001

Commonwealth Privacy Act 1998

Standards for NVR Registered Training Organisations 2012

Information Privacy Act (Vic 2001)

References Freedom of Information Act (Vic, 1982)

Goulburn Ovens Institute of TAFE website: www.gotafe.vic.edu.au

7. GOTAFE DOCUMENTATION

[Training and assessment procedure – 1. Plan – E2-P1a](#)

[Training and assessment procedure – 2. Select and Enrol – E2-P1b](#)

[Training and assessment procedure – 3. Conduct – E2-P1c](#)

[Training and assessment procedure – 4. Review and Improve – E2-P1d](#)

[Fees and charges policy – E13](#)

[Excursions and external activities procedure – E15-P35](#)

[Marketing permission form – FMA-15](#)

[Student personal details amendment form – FSA-35](#)

[Student code of conduct policy – E6](#)

[Student information release form – FSA-56](#)

[Practical Placement procedure – E14-P34](#)