

ALC Privacy Policy and Procedure

Introduction

Australian Lutheran College [ALC] collects personal information in its capacities as:

- a registered provider of courses for Australian and overseas students—both internally on campus at ALC, North Adelaide, and externally through flexible study modes
 - This personal information is required by the Department of Education, Employment and Workplace Relations [DEEWR] for the purpose of the Commonwealth Higher Education entitlements.
 - DEEWR may provide unit record data to State and Territory Higher Education authorities for the purposes of state related analysis.
 - DEEWR will comply with the provisions of the Privacy Act 1988.
- an employer of staff—academic, administrative/management and ancillary
- a provider of a theological and educational library which is open to students and the wider ALC and Church community
- an operator of boarding and hospitality facilities.

ALC will collect personal information, manage and use it, and disclose it in a way that is in accordance with relevant guidelines, instructions and legislation. The latter includes the:

- *Commonwealth Privacy Act 1988*
- *Privacy Amendment (Private Sector) Act 2000 [National Privacy Principles]*
- *Information Privacy Principles (IPPS) Instruction, Government of SA circular PC012 [Cabinet Instruction, first issued in 1989, re-issued 30 July 1992 and 18 May 2009] as administered by the Privacy Committee of South Australia [established 17 May 2001].*

Scope

This policy applies to all areas of ALC operations.

Privacy Officer

The Business Manager/Human Resource Manager is nominated as the ALC Privacy Officer and is the point of first contact for any matters arising in relation to privacy issues.

Collection of personal information

In collecting personal information ALC will:

- only collect information for lawful purposes related to its function
- only collect the information that is necessary and by lawful means
- where possible only collect personal information that is provided by the individual to whom the information relates, collecting in a way that minimises personal intrusion
- where information is provided by someone else, ensure that collection has been authorised by the individuals concerned, or by someone who is legally authorised to provide it on their behalf
- not disclose information to those outside ALC except where there is a legal entitlement, unless disclosure is authorised in writing by students. Restrictions apply also to parents, spouses or other relatives of students.

Openness

ALC will declare to individuals from whom information is collected:

- the purpose for collecting the personal information
- whether or not the collection is voluntary and any consequences arising from not providing it
- in what form of media and in what locations the information is to be held; those who may have access to it, and the intended recipients
- the name and address of any agency used to collect information on ALC 's behalf

ALC will notify the individuals concerned that personal information is being collected, either at the time of collection or as soon as practicable afterwards.

Data quality

ALC will manage personal information responsibly by:

- taking reasonable steps to ensure that personal information held is
 - relevant to the purpose for which it was collected
 - accurate
 - up to date
 - not misleading

Access and correction

ALC will:

- provide access to the personal information it holds about an individual when requested by that individual; however, access may be denied in cases where the *National Privacy Principles* provide exceptions
- inform individuals how they can obtain access to their information, check it for accuracy and completeness, and make application to correct it
- take reasonable steps to correct the information held if the individual is able to establish that the information is not accurate, complete and up-to-date
- provide reasons for denial of access or refusal to correct personal information.

Data security

ALC will take reasonable steps to:

- retain personal information for no longer than necessary, then dispose of it securely in accordance with approved methods
- protect it from loss or unauthorised access, use, disclosure, or misuse; and from unauthorised modification
- prevent its disclosure unless authorised by external service providers.

Disclosure of information

ALC will:

- only disclose personal information outside ALC or its affiliated bodies where:
 - disclosure has been consented to by the individual to whom it relates; or
 - disclosure is required by law and requested in an authorised written form [see procedures]; or
 - it is reasonably believed to be necessary to prevent or lessen a threat to life, health or the safety and welfare of any person.

- only disclose personal information to staff inside ALC on a 'need to know' basis, who require the information to carry out their duties and responsibilities in the interests of students.

Procedures

Information on students is properly secured at all times to prevent unauthorised access.

Appropriately trained nominated staff oversee the security of information and release it only to individuals and organisations who demonstrate that they have a legitimate and lawful entitlement to that information.

ALC grants students access to all records containing their respective information; regardless of whether the information is classified academic or non academic, confidential or non confidential, hard copy or electronic.

Students are able to view the information in the presence of an authorised ALC employee. However, whilst students are not permitted to remove records from the presence of the ALC employee, they may request photocopies of any information therein.

Information is provided to third parties [other than those identified below] only as specified by and on written authorisation from students. However, with regard to the provision of academic results history or transcripts to third parties, ALC has discretion to deny requests as deemed appropriate in cases where students have not dealt satisfactorily with financial obligations. Likewise with regard to students in this situation, the right to have photocopies made of such information may be withdrawn.

For the sake of administrative convenience, ALC staff are to be given appropriate notice by students requiring access to their records. In the normal course at least one clear working day's notice is required. A longer time may be necessary if circumstances justify a greater lead time. However, it is envisaged that the longest lead time from the initial request should not exceed five working days. Conversely, if the need for information is urgent, ALC staff will endeavour to provide access as soon as practicable.

ALC also will provide information, on request, in respect of all enrolled students to:

- The Australian Taxation Office in respect of liabilities under respective Commonwealth student loans schemes
- DEEWR in support of various administrative matters including verification of entitlement to ABSTUDY/AUSTUDY and associated allowances where applicable
- Centrelink, providing information in support of claims for social security allowances
- The Department of Immigration and Multicultural Affairs in connection with overseas student visa requirements
- The Australian International Development Assistance Bureau [AIDAB] in relation to overseas students
- Other recognised education institutions and tertiary admission centres where students apply for admission
- The police, in the process of criminal law enforcement
- The court, in response to subpoena in respect of civil legal actions
- Other agencies as required and approved by the Executive/Academic Dean.