

# Management of Personal Student Information Procedure

## 1 Purpose

The purpose of this procedure is to ensure the collection and use of personal student information, including the way in which a student may apply for access to their personal information, is carried out in accordance with legislative requirements.

The release of information of an academic or personal nature relating to past or present students other than in accordance with this document is prohibited.

## 2 Scope

This procedure applies to all staff of the Institute.

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## 4 Definitions

ACRONYM / Term	Definition
<b>Academic Information</b>	Records which relate to student enrolments, progress, assessment, curriculum and awards in a course.
<b>Customer Relationship Manager system</b>	Salesforce
<b>Freedom of Information Officer</b>	Head of Governance
<b>Non-Academic Information</b>	Records which do not relate to student progress, assessment, curriculum and awards in a course and includes personal information that the provider holds in relation to the student.
<b>Personal Information</b>	Personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.
<b>Privacy Officer</b>	Head of Governance

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**Authorised by:** Leadership Team

**Original Issue:** 29/07/2002

**Maintained by:** General Manager, Operations

**Last Review Date:** 10/09/2023

**Next Review Date:** 10/09/2025

**Status:** Current

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## 5 Actions

### 5.1 Collection of Student Contact Details – Course Enquiry

- 5.1.1 Potential student contact information will be collected at time of enquiry within the Customer Relationship Management system.
- 5.1.2 Potential Student contact details will only be used for the purpose in which they were collected, that is, to provide information in relation to an enquiry about a particular course.
- 5.1.3 Students can at any time withdraw their consent in the use of their personal details for contact:
  - (a) Requests to withdraw consent must be directed to the Enrolment team where the request is communicated to a staff member outside of this team.
  - (b) The Enrolment Team will flag the potential student's contact record within the Customer Relationship Management system with:
    - (c) Do Not Contact
    - (d) Do Not Call
    - (e) Email Opt Out
    - (f) Marketing Opt Out

### 5.2 Collection of Personal Student Information – Enrolment Application

- 5.2.1 SuniTAFE collects personal information via the Enrolment Application as a requirement under the National VET Data Policy and covers the standard reasons for collection and use of the student's information.
- 5.2.2 SuniTAFE will make the student aware through the Privacy Statement included within the *Enrolment Application* of:
  - (a) contact details of the Privacy Officer;
  - (b) their right to gain access to their personal information;
  - (c) the purposes for which their information is collected;
  - (d) how their information is disclosed, including by government agencies;

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- (e) how to make a complaint about how their personal information has been handled;
- (f) how to correct their personal information; and
- (g) any law that requires the particular information to be collected.
- (h) Student's will be advised they will be unable to enrol if their information is not provided via the *Enrolment Application*.
- (i) Personal information collected via the *Enrolment Application* will be entered into the Student Management System in accordance with the *Enrolment Procedure* and *Student Statistical Data Procedure*.

## 5.3 Annual Privacy Notice

- 5.3.1 The Institute will include the Privacy Notice within the *Re-Enrolment Application* for continuing students.

## 5.4 Collection of Unique Student Identifier

- 5.4.1 The Institute will collect the Unique Student Identifier as part of the enrolment process in accordance with the *Unique Student Identifier Procedure* and provide the student with notification of collection and use within the *Enrolment Application*.
- 5.4.2 Enrolment Advisors will only enter the details of a student within the USI Registry where they have been provided with a completed *Enrolment Application* by a student.
- 5.4.3 Curriculum Officers will only search and download a student's USI Transcript within the USI Registry where they have been provided with a completed *Direct Credit Transfer Request* by a student.

## 5.5 Collection of Centrelink Concession Details

- 5.5.1 The Institute will collect details of a customer's eligibility for concession or Centrepay via the *Concession Confirmation form* where a request for an enrolment concession or Centrepay Payment Plan is requested by a student.
- 5.5.2 Customers will be advised by the collection notice of the following:
  - (a) Centrelink will disclose personal information to SuniTAFE including details of the customers personal details and concession type, Centrelink payment type and status.

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- (b) Consent remains valid whilst a customer of SuniTAFE unless withdrawn by the customer and the consequences of withdrawing the consent.

5.5.3 Enrolment Advisors will only enter the details provided via the Concession Confirmation form within the Centrelink Confirmation eServices platform where they have been able to confirm the identity of the customer either in person or via confirmation of their Green ID.

## 5.6 Release of Personal Student Information - Consent to Release and Obtain Information

5.6.1 Student's may give approval for their information held within their personal file to be released to another party in accordance with a *Consent to Release and Obtain Information* form.

5.6.2 Information will only be provided to the third party as specifically detailed within the *Consent to Release Information* form.

5.6.3 The signed authorisation must be retained electronically on the student's file within the Student Management System.

5.6.4 The Administration team is responsible for ensuring *Consent to Release and Obtain Information* forms are scanned and uploaded to the student's file immediately upon receipt for the student.

5.6.5 A student may retract their consent at any time by advising in writing.

## 5.7 Requests to Disclose Personal Student Information

5.7.1 Requests to disclose student information to a third party must be made in writing and are to be directed to:

- (a) Information of a non-academic nature - to the Head of Governance; or  
(b) Academic records and related information - to the Senior Manager, Administration.

5.7.2 The age of the student will be taken into account in assessing each request for information.

- (a) In most circumstances information will not be released in regard to students over 18 years of age without first obtaining the student's consent in writing via a *Consent to Release and Obtain Information*.  
(b) Where the student cannot be contacted, the decision to release information will be determined by the Head of Governance.

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- (c) Where a student is under the age of 18 years and is able to judge the consequences of the disclosure, the privacy laws give the student the right to consent to disclosure without parental consent.
- (d) With respect to students with an Intellectual Disability and who are unable to judge the consequences of the disclosure, the guardian's/parent's consent will be obtained before information is released in conjunction with the Disability Liaison Officer.
- (e) In respect to the release of information to external agencies and organisations please refer to *Information Privacy Policy*.

5.7.3 Requests regarding attendance and/or progress of apprentices and trainees will be supplied to employers, and to schools where the student is enrolled as a School Based Apprentice or Trainee, only after confirmation that a current approved training contract is held in Institute records.

## 5.8 Complaints

- 5.8.1 An individual whose personal information is or has been held by the Institute has the right to make a complaint about an act or practice of the Institute that the individual believes is an interference with the privacy of that individual and should be addressed to the Privacy Officer.
- 5.8.2 Complaints will be managed in accordance with the *Complaints and Appeals Policy*.
- 5.8.3 Where a student is refused access to their personal information under Australian Privacy Law, the Institute will advise in writing the reasons for refusing and how they can make a complaint under the *Complaints and Appeals Policy*.

## 5.9 Requests made under 'Freedom of Information Act'

- 5.9.1 SuniTAFE is an agency under the Freedom of Information Act, and requests for release of information can be made to the Institute under the provisions of the Act.
- 5.9.2 The Act gives students the right to access documents about their personal affairs and the right to request that incorrect or misleading information held be amended or removed.
- 5.9.3 Requests for release of student information under the provisions of the Freedom of Information Act must be made in writing, using one of the prescribed methods for lodging a Freedom of Information request.

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5.9.4 The Freedom of Information Officer is responsible for reviewing requests in accordance with the provisions and exemptions of the Act and will make the decision to release or not release the requested information.

5.9.5 Appeals against these decisions can be lodged with the Chief Executive Officer.

5.9.6 Where a student is provided access to their personal information it will be provided in the way the student asked to access it, if it is reasonable and practical to do so. For example, a student may ask to access their personal information by receiving a copy in an email or post or by given information over the phone or by inspecting the information in person.

## 5.10 Personal Student Information – Unauthorised Access

5.10.1 Any suspected breach of personal information collected will be managed in accordance with the *Data Breaches Procedure*.

## 6 Associated Documents

- Complaints and Appeals Policy
- Concession Confirmation form
- Consent to Release and Obtain Information form
- Data Breaches Procedure
- Enrolment Application
- Enrolment Policy
- Enrolment Procedure
- Information Privacy Policy
- National VET Data Policy
- Re-enrolment Application
- Student Complaints and Appeals Policy
- Student Complaints Procedure
- Student Reviews and Appeals Procedure
- Student Statistical Data Procedure
- Unique Student Identifier Procedure

## 7 References

- Freedom of Information Act 1982 (*Vic*)
- Higher Education Support Act 2003 (*Cth*)
- Privacy Act 1988 – Australian Privacy Principles (*Cth*)
- Privacy and Data Protection Act 2014 (*Vic*)
- Spam Act 2003 (*Cth*)

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## 8 Forms / Record Keeping

All records generated by this procedure should be listed and must state title, location, responsible officer and minimum retention period.			
Title	Location	Responsible Officer	Minimum Retention Period
Records documenting Freedom of Information Requests which required action by the Institute	Quality and Risk	Freedom of Information Officer	Destroy 7 years after action concluded
Records documenting Freedom of Information Requests which did not proceed	Quality and Risk	Freedom of Information Officer	Destroy 2 years after action concluded

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