

1. Purpose

Australian School of Accounting's commits to its obligations under the *Privacy Act 1988* (revised) and the Australian Privacy Principles (APPs).

This document describes how ASA collects, uses, discloses and handles certain information in compliance with the 13 APPs as required by the applicable Privacy Act. It also details how interested parties may access personal information held by ASA about certain individuals and how they can lodge a complaint if they believe their privacy has been compromised.

2. Principles

Australian School of Accounting is bound by the APPs in Schedule 1 of the *Privacy Act 1988* (Cth). The APPs provide standards, rights and obligations in respect of how personal information is handled from collection, to use, disclosure, storage and access. ASA is required to be in compliance with regulations and laws of all Commonwealth and State jurisdictions in which it operates.

3. Context

Australian School of Accounting collects and stores personal information for the primary purpose of providing its higher education services. This purpose includes:

1. providing and administering approved courses, including admission, enrolment, teaching, assessment and payments;
2. student services;
3. student relations;
4. alumni relations;
5. conducting surveys and benchmarking activities;
6. research;
7. compliance with reporting requirements and administration of government programs such as the Higher Education Loan Program;
8. compliance with reporting requirements and administration of applicable laws and regulations of international students including under the *Education Services for Overseas Students Act 2000*, *Migration Act 1958* and the Migration Regulations 1994.
9. internal planning; and
10. promoting and marketing the services of ASA.

The personal information collected, held, used and disclosed is for legal obligations and internal ASA purposes. These include:

1. For students: to manage an individual's admission, enrolment, financial arrangements and payments in relation to the course, health insurance, requirements with regard to English language proficiency, passport, student visa,

breaches or suspected breaches of visa conditions; academic progress and performance and information that ASA is obliged by law to collect or report.

2. For employees, visitors and sub-contractors: to administer pay, entitlements, performance, research funding applications, access to ASA facilities and services, visa, immigration and taxation purposes and in relation to work health and safety, or rehabilitation and compensation matters.

4. Scope

This privacy policy applies to all personal information collected, used, stored and disclosed by ASA except information:

1. in a publication that is available to the public;
2. kept in a library, art gallery or museum for reference, study or exhibition purposes;
3. which is a public record that is available for public inspection; or
4. that is an archive within the meaning of the *Commonwealth Copyright Act 1968*.

5. Definitions

Term	Definition
Health information	includes information or an opinion about the health, including an illness, disability or injury (at any time) of an individual that is also personal information.
Personal information	is information or an opinion (including information or an opinion forming part of a database) about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in material form or not.
Sensitive information	Sensitive information is a type of personal information and includes information about an individual's: <ol style="list-style-type: none"> 1. health (including predictive genetic information) 2. racial or ethnic origin 3. political opinions 4. membership of a political association, professional or trade association or trade union 5. religious beliefs or affiliations 6. philosophical beliefs 7. sexual orientation or practices 8. criminal record 9. biometric information 10. biometric templates.
Students	may refer to current and prospective students and alumni.

6. Policy

6.1 Collection of Information

Australian School of Accounting will collect information by lawful and fair means, which are not unreasonably intrusive. ASA will collect information that is reasonably necessary to perform its functions and activities or to comply with the law. ASA will collect personal information through a variety of paper and electronic formats regarding its staff, students and external clients. ASA will generally collect and may record personal information when an individual:

1. lodges an online enquiry;
2. applies for admission;
3. enrolls in a course;
4. applies for an extension, deferred exam or intermission of studies;
5. applies for employment;
6. attends an interview with ASA;
7. sends ASA an email;
8. completes any forms relating to study or work; and
9. communicates personal information in any other way to ASA in relation to study or work.

Australian School of Accounting will collect personal information directly from an individual and may also collect information legally from third parties, such as a family member who contacts ASA on an individual's behalf, from authorised agents acting on an individual's behalf, through other education providers or a publicly maintained record. Information is only collected from third parties where necessary to verify the information, where an individual has authorised the third party to act on her behalf, or where ASA is required by law. ASA will obtain an individual's permission to collect information from third parties except in emergency situations or when legally required to do so.

Australian School of Accounting will also collect cookie-derived information such as an IP address when an individual logs into the e- Learning system. This is done to maintain the connection and is not stored. Time and date of access is retained against an individual's e- Learning record and may be used to help manage study and academic progress for an individual.

If an individual refuses to provide relevant and requested personal information, ASA may not be in a position to continue any interaction with the individual.

6.2 Use and disclosure of Information

Australian School of Accounting will only use or disclose personal information for the primary purpose for which it was obtained or collected, for any related secondary purpose that you would reasonably expect, or with an individual's consent, or as permitted or required by law or as authorised by the APPs.

Australian School of Accounting may use or disclose personal information (other than sensitive information) for direct marketing, but must only do so in accordance with the APPs.

Australian School of Accounting will only disclose health information in accordance with the Health Privacy Principles.

Some examples of how ASA uses personal information include, but may not be limited to:

1. advising individuals about changes and/or matters affecting subject outlines, assessments, attendances, and other matters relating to the direct management and administration of their study;
2. managing and assisting an individual to achieve academic progress;
3. paying wages, superannuation and other employment benefits;
4. helping an individual resolve any issues that might affect their study or work;
5. inviting an individual to participate in non-study/work activities that ASA offers; and
6. inviting an individual to provide feedback on their teaching and learning or work experience.

The following are examples (but not limited to) where ASA discloses personal information for legitimate purposes:

1. acquiring products and services which an individual authorises ASA to purchase for them, such as overseas student health care;
2. offering and providing student support services (such as welfare related services, emergency and health services and complaints and appeals processes);
3. publishing examination and assessment results;
4. releasing academic details to another tertiary institution or tertiary admission centre if an individual applies to transfer their studies;
5. protecting a student or someone else from a serious and imminent threat to their life or health;
6. disclosure that is reasonably necessary for the enforcement of the criminal law; and
7. in the event of an emergency, requiring disclosure to police, hospital or medical personnel.

Australian School of Accounting may disclose personal information to third parties for the purposes set out in this Privacy Policy, such:

- as to a provider with whom ASA provides (or intends to provide or have provided) a course to an individual;
- an education agent;
- a person or body who sponsors an individual (if any); or
- any person entitled to the information or to any person whom an individual has authorised to disclose her personal information to.

Australian School of Accounting may also disclose personal information to third party service providers whom ASA has retained to perform services on its behalf. When ASA does

this, it will only provide the service providers with such information as required to perform those services.

Australian School of Accounting may also disclose an individual's personal information to their nominated overseas education agent. ASA shall comply with the APP in respect of any disclosure of personal information to overseas recipients.

Australian School of Accounting may also use and disclose information where required or authorised by law (meaning any Commonwealth, State or Territory law or the common law) or in accordance with the APPs.

Australian School of Accounting may also use or disclose an individual's personal information if it reasonably believes that such disclosure is necessary.

6.3 Storage and access of information

ASA maintains personal information which may be stored in electronic and/or hardcopy form. ASA will take reasonable precautions to ensure that information is stored securely, is accurate and protected from misuse, loss, unauthorised access, modification or disclosure.

Australian School of Accounting's staff are bound by confidentiality on the use of personal information and are required to respect the privacy of individuals and ASA has in place controls to protect personal information including managing access to ASA's premises, security access to ASA's computer networks and other security technology.

Australian School of Accounting may hold information about an individual while they are a student and before and after they are a student. Where information is no longer needed and no longer required to be retained under legislation, ASA will either destroy records containing personal information by reasonably secure means or de-identify the personal information.

Individuals may request access to information that ASA holds about them by submitting a written request with ASA. The request must be made by an individual personally or by another person that he or she has authorised to make the request on the person's behalf. ASA may permit either inspection, note taking, copying or provide a print out of information, as it considers appropriate. Any request for access to personal information will be dealt within a reasonable period after the request is made and ASA may charge a reasonable fee for the cost of accessing and supplying the requested information. In limited circumstances permitted under APP, ASA may refuse access to your personal records. In those specific cases, an individual will be duly notified of the reason behind ASA's refusal to grant access.

6.4 Data maintenance

Australian School of Accounting takes reasonable steps to confirm the accuracy of information it holds about an individual. From time to time, ASA asks for updated information including that required by legislation. Individuals also have the right under APP

to request corrections be made to any of their personal information that ASA maintains if, having regard to the purpose for which it is held, the information is incomplete, irrelevant, incorrect, out-of-date or misleading. ASA is, however, not obliged to update information it holds about an individual after she has ceased her connection with ASA.

6.5 Complaints

Concerned individuals may submit a complaint if they believe that ASA has breached the provisions of the Privacy Act 1988 and/or Australian Privacy Principles. Each breach will need to be dealt with on a case-by-case basis. All complaints and alleged breaches will be investigated by an independent privacy officer and the complainant will be advised of the results.

7. Related Documents

Privacy Act 1988

Australian Privacy Principles

8. Relevant Legislation

The authority to collect manage, use and disseminate an individual's personal information is contained in the following legislation:

- *Education Services for Overseas Students Act 2000*
- *Education Services for Overseas Students Regulations 2001*
- *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018*
- *Higher Education Support Act 2003*
- *Social Security (Administration) Act 1999*

9. Version Control

Document		Privacy Policy			
Approved by		Board of Directors		Date: 04 November 2020	
		Next review			2023
Version #	2.1	Replaces Version #	2.0	Update table	
	2.0		1.1	Board of Directors approval	
	1.1		1.0	Governance restructure	
	1.0		0.5	Council approval	
	0.5		0.4	Style review	
	0.4		0.3	Review post-Council meeting 4 Next Review	2022
	0.3		0.2	Styling	
	0.2		0.1	Council review	

