



## PRIVACY POLICY

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### 1. PURPOSE

The purpose of this policy is to outline:

- MC's policy on how the institution collects and holds personal information provided to or collected by it;
- The types of personal information collected;
- Who the information may be disclosed to; and
- Security of the provided information.

### 2. DEFINITIONS

<b>Key Term or Acronym</b>	<b>Definition</b>
MC	Morling College
Personal Information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable: <ul style="list-style-type: none"><li>• whether the information or opinion is true or not; and</li><li>• whether the information or opinion is recorded in a material form or not</li></ul>
Sensitive Information	(a) information or an opinion about an individual's: <ul style="list-style-type: none"><li>• racial or ethnic origin; or</li><li>• political opinions; or</li></ul>

	<ul style="list-style-type: none"> <li>• membership of a political association; or</li> <li>• religious beliefs or affiliations; or</li> <li>• philosophical beliefs; or</li> <li>• membership of a professional or trade association; or</li> <li>• membership of a trade union; or</li> <li>• sexual orientation or practices; or</li> <li>• criminal record;</li> </ul> <p>(b) health information about an individual; or</p> <p>(c) genetic information about an individual that is not otherwise health information; or</p> <p>(d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or</p> <p>(e) biometric templates.</p>
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### 3. SCOPE

All current and prospective students and staff of Morling College (MC).

### 4. POLICY STATEMENT

MC values the privacy of its students and staff. All current and prospective students and staff of Morling College (MC) are entitled to:

- Know how MC manages personal information that is provided to or collected by it;
- Be aware that MC is bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Commonwealth);
- Be aware that MC may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the institution’s operations and practices and to make sure it remains appropriate to the changing educational environment.

### 5. PRINCIPLES

#### Personal Information Collected

- 5.1 The type of information MC collects and holds includes (but is not limited to) personal information, including sensitive information, about:
- students before, during and after the course of a student’s enrolment at the institution;
  - job applicants, staff members, volunteers and contractors, and
  - other people who come into contact with the institution.
- 5.2 MC will generally collect personal information held about an individual by way of forms filled out by students, face-to-face meetings and interviews, electronic communication and telephone calls.

- 5.3 In some circumstances, MC may be provided with personal information about an individual from a third party, for example a reference from another institution or a report provided by a medical professional.
- 5.4 Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the MC's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between MC and employee.

#### **Use of Personal Information**

- 5.5 MC will use personal information for the primary purpose of collection and for such other secondary purposes that are related to the primary purpose of collection and to which it is reasonably expected by you, or to which you have consented.

#### ***Students or Prospective Students***

- 5.6 MC's primary purpose for the collection of personal information relating to students or prospective students is to enable the College to provide an educational service throughout the student's enrolment period.
- 5.7 The purpose for which MC uses personal information of students includes:
- providing services to its students and to those enquiring about study at MC;
  - processing enrolment applications;
  - communicating with students;
  - maintaining appropriate academic and financial records;
  - performing other internal administrative functions;
  - maintaining contact with past students;
  - looking after students' educational, social and medical wellbeing;
  - seeking donations and marketing for the institution, and
  - satisfying MC's legal obligations such as providing statistical and other information required by government.
- 5.8 In some cases, where MC requests personal information about a student, if the information requested is not obtained, MC may not be able to enrol or continue the enrolment of the student.

#### ***Job Applicants, Staff Members and Contractors***

- 5.9 In relation to personal information of job applicants, staff members and contractors, MC's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.
- 5.10 The purposes for which MC uses personal information of job applicants, staff members and contractors include:
- in administering the individual's employment or contract, as the case may be;
  - for insurance purposes;

- marketing for the institution, and
- in satisfying MC's legal obligations.

### ***Volunteers***

5.11 MC also obtains personal information about volunteers who assist the institution in its functions or conduct associated activities, such as alumni associations, to enable MC and the volunteers to work together.

### ***Marketing and Fundraising***

5.12 MC treats marketing and seeking donations for its future growth and development as an important part of ensuring that MC continues to be a quality learning environment in which both students and staff thrive. Personal information held by the institution may be disclosed to an organisation that assists in MC's fundraising, for example, the Morling Foundation or alumni organisation. Staff, contractors and other members of the wider community may from time to time receive fundraising information. MC publications, such as newsletters and magazines, which include personal information, with the exclusion of sensitive information, may be used for marketing purposes.

### **Treatment of Sensitive Information**

5.13 Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless agreed otherwise, or the use or disclosure of the sensitive information is allowed by law.

### **Disclosure of Personal Information**

5.14 Subject to the privacy obligations of this policy, MC may disclose personal information, including sensitive information, held about an individual to:

- government departments;
- medical practitioners;
- people providing services to the College, including specialist visiting lecturers;
- another institution (such as the ACT) requiring information;
- recipients of MC publications;
- anyone authorised by the student/volunteer/staff member; or
- anyone to whom MC are required to disclose the information by law.

5.15 MC will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles.

5.16 MC may also store information on servers outside Australia (in the "cloud").

### **Management and Security of Personal Information**

5.17 MC's staff are required to respect the confidentiality of students' and staff's personal information and the privacy of individuals. MC has in place steps to

protect the personal information the institution holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

#### Updating Personal Information

- 5.18 MC endeavours to ensure that the personal information held is accurate, complete and up-to-date. A student may seek to update their personal information by contacting the Department of Student Services. An employee can update their information on the staff Employment Hero portal.
- 5.19 The Australian Privacy Principles requires MC not to store personal information longer than necessary.

#### The Right to Check the Personal Information MC Holds

- 5.20 Under the Privacy Act, an individual has the right to obtain access to any personal information which the institution holds about them and to advise the institution of any perceived inaccuracy.
- 5.21 Individuals are able to contact the Principal or Chief Operating Officer in writing requesting access to any information MC holds about them.
- 5.22 MC may require the individual to verify their identity and to specify the information they require. MC may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, MC will advise the likely cost in advance.
- 5.23 There may be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of MC's legal obligations.

#### Complaints

- 5.24 If an individual would like to make a complaint about how MC manages or has used or disclosed his or her personal information or has breached the Australian Privacy Principles, the individual should contact the Chief Operating Officer on/at (02)98780201 or email [peterm@morling.edu.au](mailto:peterm@morling.edu.au).
- 5.25 MC will investigate the complaint and will notify the individual of its decision and any action taken as soon as possible.

## **6. RELATED DOCUMENTS AND LEGISLATION**

Cyber Security Policy  
Disaster Recovery and Business Continuity Policy  
ICT Disaster Recovery and Business Continuity Plan  
Risk Management Policy

Staff Code of Conduct  
Privacy Act 1988 (Cth)  
Privacy Regulation 2013 (Cth)

## 7. REFERENCES

None

## 8. VERSION HISTORY

Version	Approved by	Approval Date	Effective Date	Changes made
3.01	Policy Coordinator	Feb 2023	Feb 2023	Policy transferred to Morling policy template, including addition of policy header table, version history table and Related documents and legislation. Removed reference to the registrar.
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2.00				Unknown
1.00	MC Board	November 2014	November 2014	Policy created

*Download this policy anew with each use, as it may have changed.*