POL-GM-004 – PRIVACY POLICY

St Albert's College

Version	2023-1	Pages:	1+4
Drafted by		Approved by Board on	18 Oct 2023
Responsible person	The Principal	Scheduled review date	Oct 2026
History:			

Consideration of personal information privacy

St Albert's College is a not-for-profit organisation providing student accommodation and conference/catering services.

St Albert's College respects and upholds individuals' rights to privacy and rights to their personal information. Consequently, St Albert's College is committed to protecting the privacy of personal information it collects, holds and administers in the process of providing its services in compliance with the Australian Privacy Principles (APPs) under the *Privacy Act 1988 (Cth) (the Act).*

This policy sets out how we collect and manage your Personal Information (including sensitive and health information)

Collection of Personal Information

Primary purpose for collection of information
St Albert's College primarily collects personal information to ensure timely delivery of accommodation and related student services.

Secondary purpose
St Albert's College provides newsletters to residents, their representatives, family, contacts and staff, volunteers and other persons or entities with a relationship with St Albert's College.

St Albert's College holds tax gift deductibility status as well as authority for charitable fundraising. Public fundraising through events and bonafide donations supplements our fee and subsidy income and assists us with the services we provide. From time to time we will include advice of any such activities via inclusion in newsletters or specific notices.

As such we use the names and addresses from our records. Persons can elect not to receive newsletters and other updates, however most find this information helpful.

Information we collect, use and store

The information we collect and use will depend on the relationship with St Albert's College. The College may collect personal information from or about individuals relating to their being a resident, contractor, supplier, volunteer, stakeholder, present or potential employee, or in some other capacity.

In the course of providing services the College may collect and hold:

- *personal information* including names, addresses, and other contact details; visual images; dates of birth; and financial information;

- *sensitive information* including government identifiers (including but not limited to Student Number; Tax File Number [TFN]), nationality, country of birth, religion, professional memberships and UNE Academic Performance Reports)

- *health information* (particularly in relation to prospective staff and resident records) including medical records, disabilities, immunisation details and psychological reports.

As part of our recruitment processes for employees, contractors and volunteers, the College may collect and hold:

- *personal information* including names, addresses and other contact details, dates of birth, financial information, citizenship, employment references, regulatory accreditation, media, directorships, visual images, and driver's licence information.

Consequences If personal Information Is not collected

Prospective Residents
If personal information is not collected because it is refused or not available, we may be delayed in or prevented from offering placement.

Residents
St Albert's College is committed to providing its residents with the very best of support and services to improve their quality and university experience. If your personal information is not collected because it is refused or not available, it may result in a different level of service to you than you could be entitled to.

Contractors, Suppliers, Volunteers and Employees
St Albert's College is subject to compliance obligations under state and federal legislation. If personal information is not collected because it is refused or not available, we may be prevented from engaging your services.

Dealing with Personal Information

How we collect information

We may collect Personal Information in any of the following ways:

Residents/Prospective Residents

- From the Individual / Representative
    - (i) Upon the initial inquiry by the completion of our application forms
    - (ii) During interviews with the Individual/ representative
    - (iii) Upon completion of the Individual's Residential Agreement
- From the University of New England
- From the Individual's legal or other professional advisors

Prospective Employees

- Information provided from the Individual
- Information provided by referees proposed by the Individual
- Information provided by third parties with the consent of the individual
- Information provided on request from previous employers

Other Individuals with whom we have contact

- Personally by mail, email, fax, phone or face to face
- Information provided by third parties with the consent of the individual.

Anonymity

Where lawful and practicable, St Albert's College allows people to participate in activities anonymously (e.g. when requesting generic information, completing evaluation forms, opinion surveys or when making a donation). Anonymous compliments and complaints about any aspect of St Albert's College services, including privacy matters, are also able to be submitted via mail or email.

Disclosure of personal Information to others

Using and disclosing personal information requires consent from the individual or from a person authorised to act on their behalf, where it is practical and reasonable to do so. In order for us to effectively provide our services and manage and administer our business operations, we may disclose information to third parties which may include (but are not limited to) the following:-

- any persons acting on our behalf, including professional advisers
- government and regulatory bodies including the University of New England
- where disclosure is permitted or required by law.
- The public interest requires the release of confidential information
- contractors or service providers engaged by us

(Contractors are required to abide by the same confidentiality and privacy requirements as St Albert's College employees and this is clearly stated within non-disclosure clauses in their contract)

Cross-border disclosure of personal information

St Albert's College will not transfer your personal information to third parties outside Australia unless they are subject to similar privacy laws or schemes, or your consent has been obtained, or other provisions of the Australian Privacy Principles in relation to cross-border Disclosure of Personal Information apply.

Withdrawal of Consent

Notwithstanding the above, there is the right to withdraw consent to release of personal information at any time. Ideally, such a request should be in writing including the reasons, to the College Privacy Officer.

Integrity of personal information

Information and Data Security

Personal information may be stored:

- Electronically on our computer databases
- Hard copy documents kept securely within the premises

St Albert's College strives to ensure the security, integrity, and privacy of your personal information . Periodically we review and update our security measures in relation to current and future technologies. Systems and procedures are already in place to protect your personal information from misuse and loss and from unauthorised access, modification or disclosure. All St Albert's College staff are required to sign a confidentiality agreement on commencement of employment.

St Albert's College will retain information in line with its record retention policies. When information is no longer required or relevant it will be disposed of in a secure manner.

Identifiers

St Albert's College will identify individuals (including clients and staff) by a number of unique identifiers internally assigned by St Albert's College. St Albert's College may, however, retain a record of other external agency personal identifiers that are required to provide services, coordinate with other organisations, or otherwise fulfil service, operational, or reporting obligations.

Access to and Correction of Personal Information

Access to personal information

You can request access to any of your personal information held by St Albert's College by contacting the College Privacy Officer.

It is preferable that the request is in writing describing the information required, the purpose and the type of access (eg view; provide photocopies)

Generally, if requested, an individual will be provided access to any personal information held about them, in the manner requested, unless:

- we are unable to establish and individuals identity
- it is unlawful to provide the information;
- it poses a serious and imminent threat to the life or health of any individual;
- it has an unreasonable impact upon the privacy of other individuals;
- the request is frivolous or vexatious; or
- access is otherwise exempt under the Australian Privacy Principles.

All refusals will be promptly notified including reasons.

St Albert's College will ensure the request is handled in a timely manner. It is reasonable to expect that extraction of the personal information required may then take up to fifteen working days due to the need to access both paper based and computerised information systems. A nominal fee may be charged to meet the costs of extracting and photocopying the information and you will be provided with notice of such fee prior to proceeding with your request.

Correction of personal information

If you believe any information we hold about you is inaccurate, incomplete or out-of-date, you should contact us. We will respond to your request within a reasonable period and take reasonable steps to amend your records.

Privacy concerns, complaints and suggestions

If you have any concerns, complaints, suggestions or questions as to how we might improve in this area please contact the Privacy Officer, St Albert's College at the address below. We take complaints and suggestions seriously and will act promptly in response to any notification.

Contact Details

St Albert's College:

The Privacy Officer

St Albert's College
131 Handel Street
Armidale NSW 2350
Phone: 02 5733 5200

Email: privacyofficer@stalberts.com.au

Australian Information Commissioner:

Office of the Australian Information Commissioner GPO Box 5218
Sydney NSW 2001

phone: 1300 363 992 Fax: 02 9284 9666

Email: enquiries@oiac.gov.au

Online: https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint