

# **PRIVACY AND PERSONAL INFORMATION PROCEDURES**

## **1. Overview**

In the course of its business, Higher Education Leadership Institute (“the Institute”) may collect information from individuals, including students or persons seeking to enrol with the Institute, either electronically or in hard copy format, including information that personally identifies individual users. The Institute may also record various communications between individuals and the Institute.

When collecting, handling and storing personal information the Institute will comply with the requirements of the Australian Privacy Principles (APPs) set out in the *Privacy Act 1988 (Cth)* as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

## **2. Collection and use of personal information**

The Institute will only collect personal information from individuals by fair and lawful means which is necessary for the functions of the Institute. The Institute will only collect sensitive information with the consent of the individual and if that information is reasonably necessary for the functions of the Institute.

The information requested from individuals by the Institute will only be used to provide details of study opportunities, to enable efficient course administration, to maintain proper academic records, provide access to Commonwealth funding (if applicable), ensure your fees are protected, provide advisory services and, if required, to report to government agencies as required by law (such as the Tertiary Education Quality Agency - TEQSA) or the Higher Education Tuition Protection Director (who in turn may disclose personal information to a replacement higher education provider or the Australian Government Actuary). Information will also be collected from individuals that have a relationship with the Institute, such as staff members. If an individual chooses not to give the Institute certain information then the Institute may be unable to enrol that person in a course, supply them with appropriate information or have a contractual relationship with them.

### **2.1 Collection of information through the Institute’s website**

The Institute has activated Google Analytics Demographics and Interest Reports to enable us to better understand the visitors to the Institute’s website ([www.heli.edu.au](http://www.heli.edu.au)).

The Institute uses the Google Analytics cookie and Google advertising cookie to analyse visitor traffic on the Institute’s website in order to improve the information we provide to visitors and in order to focus the Institute’s marketing to its target audience.

Visitors to the Institute's website can opt-out of the Google Analytics Advertising Features, including through Ads Settings, Ad Settings for mobile apps, or by installing the Google Analytics Opt-out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout/>.

### **3. Disclosure of personal information**

The Institute will not knowingly share any personal information with any third party other than any service providers who assist the Institute in providing the information and/or services the Institute provides or as required under the *Tertiary Education Quality Standards Act 2011* or the *Higher Education Support Act 2003*, or as permitted by an individual. The Institute does not and will not sell or deal in personal information. The Institute may use information gathered in a general sense without any reference to an individual's name to create marketing statistics, identify user demands and to assist it in meeting client needs generally. In addition, the Institute may use the information that individuals provide to improve its website and online services but not for any other use.

The Institute will not disclose an individual's personal information to another person or organisation unless:

- a) the individual concerned is reasonably likely to have been aware, or made aware, that information of that kind is usually passed to that person or organisation;
- b) the individual concerned has given written consent to the disclosure;
- c) the Institute believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person;
- d) the disclosure is required or authorised by or under law (including to the Australian Government or its designated agencies, state or territory agencies and the Tuition Protection Service (TPS)); or
- e) the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.

Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of the public revenue, the Institute shall include in the record containing that information a note of the disclosure.

Any person or organisation that collects information on behalf of the Institute or to whom personal information is disclosed as described in this procedure will be required to not use or disclose the information for a purpose other than the purpose for which the information was collected by them or supplied to them.

#### **4. Security and integrity of personal information**

The Institute is committed to ensuring the confidentiality, security and integrity of the personal information it collects, uses and discloses.

The Institute will take all reasonable steps to ensure that any personal information collected either electronically or in hard copy is relevant to the purpose for which it was collected, is accurate, up to date and complete.

The Institute will store securely all records containing personal information and take all reasonable security measures to protect personal information it holds from misuse, interference, loss, unauthorised access, modification or disclosure.

Where the Institute has no further use for personal information for any purpose disclosed by the Institute, or is no longer required to maintain that personal information, all reasonable steps will be taken to destroy or de-identify the information.

#### **5. Right to access and correct records**

Individuals have the right to access or obtain a copy of the personal information that the Institute holds about them. Requests to access or obtain a copy of personal information must be made in writing. There is no charge for an individual to access personal information that the Institute holds about them; however the Institute may charge a fee to make a copy. Individuals will be advised of how they may access or obtain a copy of their personal information and any applicable fees within 10 days of receiving their written request. Where it is reasonable to do so, access to the information will be provided in the manner requested by the individual.

If an individual considers their personal information to be incorrect, incomplete, out of date or misleading, they can request that the information be amended. Where a record is found to be inaccurate, a correction will be made as soon as practical. Where an individual requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment will be noted on the record. There is no charge for making a request to correct personal information.

Written requests for access to, to obtain a copy of, or correct personal information held by the Institute should be sent to the Operations Manager at [admin@heli.edu.au](mailto:admin@heli.edu.au).

#### **6. Complaints about an alleged breach of the APPs**

Where an individual believes that the Institute has breached a Privacy Principle in relation to that individual, they may lodge a complaint using the Institute's grievance handling procedures which enables individuals to lodge grievances about handling of personal information and access to personal records.

## 7. Publication

These *Privacy and Personal Information Procedures* will be made available to individuals, including students and persons seeking to enrol with the Institute, by publication on the Institute's website: [www.heli.edu.au](http://www.heli.edu.au). Alternatively, a copy of this policy may be requested by contacting the Operations Manager using the contact details provided above.

## 8. Version history

Version	Approved by	Approval Date	Details
1.0	Executive Management Committee	8 July 2016	Document creation and initial approval
1.1	CEO	12 April 2017	Minor updates suggested by Communications Manager for online marketing of PD courses
2.0	Executive Management Committee	19 May 2017	Final review by EMC and minor changes arising from that review
3.0	Executive Management Committee	4 May 2018	Changes to cover a broader range of individuals, including staff
3.1	CEO	7 January 2019	Updated to include section 2.1 regarding the Institute's website
3.2	Operations Manager	4 November 2020	Add TPS and change to email address and position title
3.3	Operations Manager	10 May 2021	Updates in accordance with Departmental advice

Document owner: Operations Manager