

Privacy Policy

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1. PURPOSE

Barton Business School ("BBS") is committed to protecting the privacy of its staff and students as well as others with whom it engages while undertaking its learning, teaching, and associated administrative activities and support services.

This policy guides BBS's approach to its information-handling practices in relation to the information collected from its staff, students, and others who with whom it engages.

The intent of this policy is to ensure that BBS complies with 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. SCOPE

This Policy applies to all students of BBS, including former and prospective students, all members of BBS's Boards and Committees, and all BBS staff and contractors.

3. DEFINITIONS

Refer to BBS's *Glossary of Terms*.

4. POLICY

- a. BBS's Board members, Committee members, staff, students, contractors, and other stakeholders are entitled to the protection of their privacy.
- b. BBS ensures that all personal information, including that shared with third-party service providers, is handled in accordance with the Australian Privacy Principles.
- c. BBS recognises its obligation to collect, store, and use personal information and takes necessary measures to protect privacy. All personal information is collected for the operations of BBS. Personal information is collected directly from an individual. In some cases, a third party, such as a family member, may also provide information on an individual's behalf.
- d. This policy has been developed to align with the [Australian Privacy Principle \(APP\) guidelines](#) provided by the [Office of the Australian Information Commissioner](#).
- e. All staff and functional units of BBS must be aware of and implement the privacy principles and practices established by legislation and articulated in this and other related policies.

4.1. PRINCIPLES

The key principles informing this policy are:

- a. Lawful methods for collecting personal information.
- b. Timely notification of the collection of personal information.
- c. Reasonable and proper purpose for collecting personal information.
- d. Secure handling of personal information.
- e. Right of individuals to access personal information.
- f. Right of individuals to have incorrect, outdated, incomplete, or misleading information about them changed.
- g. Consent to the disclosure of personal information to third parties.

4.2. COLLECTION AND USE

Information will be collected directly from staff, students, and persons seeking employment or enrolment with BBS. Information collected may include personal identifiers (e.g., name, date of birth), financial data (e.g., payment details), and academic information (e.g., enrolment and progression data). Sensitive information, such as health data, will only be collected where necessary, and with explicit consent or as required by law.

BBS collects personal and financial information to comply with government reporting requirements under the [Higher Education Support Act 2003 \(HESA\)](#), including data related to the Commonwealth Higher Education Student Support Number (CHESSN) and the [Higher Education Loan Program \(HELP\)](#). Students are informed during enrolment that their personal data will be used for such reporting purposes."

BBS will use fair and lawful means to collect only personal information that is necessary for the functions of BBS. Information requested from staff will be related to their terms of employment, conditions, and responsibilities. Information requested from students will be related to admission, enrolment, progression, and other matters related to their studies.

The information requested from individuals must only be used for:

- a. facilitating processes related to employment such as payment, taxation, and leave;
- b. reporting to government agencies as required by the law;
- c. providing details of study opportunities;
- d. maintaining proper academic records;
- e. enabling efficient program administration.

4.3. DISCLOSURE

- a. Personal information about students may be shared with the Tertiary Education Quality Standards Agency, the Australian Department of Education and Training, the Department of Home Affairs, the Tuition Assurance Scheme manager, and the Tuition Protection Service for international students. This information includes personal and contact details, course and unit enrolment details, and changes.
- b. BBS engages reputable third-party service providers, such as cloud storage and communication platforms, to support its operations. These providers implement robust privacy and security measures aligned with global industry standards. While BBS takes reasonable steps to select providers committed to protecting personal information, it does not have direct control over their compliance with Australian privacy laws. Stakeholders are encouraged to review the privacy policies of these providers for further details.
- c. In most cases, an individual's personal information will not be disclosed to another person or organisation unless:
 - i. the individual has consented to the disclosure;
 - ii. is reasonably likely to be aware or made aware that their information is usually disclosed to specific individuals, authorities, or organisations.
- d. Information held by BBS about an individual may be disclosed under various circumstances where the disclosure is:
 - i. necessary to reduce or prevent a serious threat to the life or health of the individual concerned or of another person;
 - ii. necessary for the enforcement of the criminal law or the protection of the public revenue;
 - iii. required or authorised by law.
- e. Where personal information has been disclosed for law enforcement or the protection of public revenue, BBS must keep a record of the disclosure.

4.4. ACCESS AND CORRECTION

- a. The only people permitted to access personal information are those individuals who require and are authorised to access the information during their duties.
- b. Requests by students to access or obtain a copy of their personal information must be made in writing to the Dean.
- c. Requests by staff to access or obtain a copy of their personal information must be made in writing to the Administration and Human Resource Manager.
- d. Individuals must be advised how to access or obtain a copy of their personal information.
- e. If personal information is considered incorrect, outdated, incomplete, or misleading, an individual can request the information to be amended. Such requests must be made in writing by students to the Dean and by staff to the Human Resource Manager. There is no charge for requesting that justified amendments to personal information be made.

4.5. SECURITY AND INTEGRITY

- a. BBS retains personal and financial records in compliance with applicable laws, regulations, and operational requirements. Retention periods are determined by:
 - i. Compliance Obligations: Meeting requirements under legislation such as the Higher Education Support Act 2003, taxation laws, TEQSA guidelines, and other relevant state and federal regulations, including those governing workplace safety, public records, and data protection.
 - ii. Operational Needs: Supporting audits, funding, and reporting requirements to ensure institutional integrity.
- b. Personal information is securely destroyed or permanently de-identified when it is no longer required for its original purpose or as mandated by law. This includes:
 - i. Shredding physical records.
 - ii. Using secure digital methods for erasing electronic data.

5. BREACHES, COMPLAINTS, AND APPEALS

5.1. DATA BREACH RESPONSE

- a. In the event of a suspected or confirmed data breach, BBS will:
 - i. Assess the Breach: Investigate the scope, data affected, and potential harm.
 - ii. Notify Stakeholders: Report eligible breaches to the Office of the Australian Information Commissioner (OAIC) and notify affected individuals as required under the Notifiable Data Breach (NDB) scheme.
 - iii. Mitigate Harm: Take corrective measures to contain the breach and prevent recurrence.
 - iv. Document Incidents: Maintain detailed records of breaches, including actions taken and notifications provided.
- b. A staff member in breach of this policy may be subject to disciplinary action in accordance with the *Staff Code of Conduct*.

5.2. COMPLAINTS AND APPEALS

- a. Where a staff believes that BBS has breached this policy, they may lodge a complaint using the *Staff Complaints and Appeals Policy and Procedure*.
- b. A student in breach of this policy may be subject to disciplinary action in accordance with the *Student Code of Conduct*.
- c. BBS is committed to investigating and resolving privacy complaints in a timely, open, fair, and transparent manner.
- d. Students who believe that BBS has breached this Privacy Policy or who face issues related to HELP loans, funding matters, or other grievances may lodge a complaint using the BBS Student Complaints and Appeals Policy and Procedures. This policy provides a

comprehensive framework for resolving all student concerns, including those related to funding, enrolment, and privacy matters.

- e. If BBS's response to a privacy complaint is considered unsatisfactory, a complaint can be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details can be found at www.oaic.gov.au.

6. VERSION CONTROL

Document title	Privacy Policy	
Approved By	Board of Directors	
Date of Review	This policy is to be reviewed every two-years at a minimum from the date of final approval.	
Related Documents	<ul style="list-style-type: none"> • Awards Issuance and Graduation Policy • Student Academic Integrity Policy and Procedures • Academic Progression and Student At Risk Policy and Procedures • Admission Policy and Procedures • Discrimination, Bullying, Harassment and Sexual Misconduct Policy • Marketing and Student Recruitment Policy • Records Management Policy • Staff Code of Conduct • Staff Complaints and Appeals Policy and Procedures • Staff Recruitment and Selection Policy • Student Code of Conduct • Student Complaints and Appeals Policy and Procedures 	
Related Legislation and References	<ul style="list-style-type: none"> • Privacy Act 1988 (Cth) • Australian Privacy Principles (APPs) • Education Services for Overseas Students Act (ESOS) 2000. • Freedom of Information Act 1982 (Cth) • Health Records Act 2001 • Higher Education Standards Framework (Threshold Standards) 2021 • Privacy and Data Protection Act 2014 – Victorian legislation • Public Records Act 1973 • Tertiary Education Quality and Standards Act 2011 • Higher Education Support Act 2003 • Higher Education Provider Guidelines 2023 	
Version	Notes	Date Approved
1.0	<ul style="list-style-type: none"> • The first draft was tabled and approved with minor changes discussed in Policy scope and sections 4.3 and 4.5. 	13/09/2022
1.1	<ul style="list-style-type: none"> • Document approved subject to minor editorial changes in sections 1, 4 and 5. The policy now mandates that any request to obtain a copy of information must be made in writing. 	11/09/2023
2.0	<ul style="list-style-type: none"> • Policy has been updated to meet FEE-HELP and HESA Act 2003 requirements 	09/12/2024