

PRIVACY PROCEDURE

Section 1 - Purpose and Scope

- (1) This Privacy Procedure implements the Privacy Policy, setting out:
- the circumstances in which the College is likely to collect personal information (also referred to as personal data);
 - the collection of personal data for government reporting purposes;
 - the circumstances applying to the capture of video or image-based information;
 - the process by which individuals can seek access to their personal information;
 - a statement setting out how ACPE uses personal information for marketing purposes;
 - how individuals can opt-out of receiving marketing material; and
 - how ACPE uses cookies.

Section 2 – Procedure

When is personal data collected

- (3) The College may collect an individual's personal data when they:
- Visit the College website (transaction-based data only).
 - Complete online or paper/PDF application forms or where the individual is interviewed by a College staff member (such as student enrolment advisor or Head of Department) prior to enrolment. Details collected may include:
 - Contact details i.e.:
 - name;
 - gender;
 - date of birth;
 - postal address (postal box number and/or a street address);
 - social media contact details;
 - telephone number/s (mobile and landline).
 - Identity and Immigration documentation; for example:
 - passport;
 - driver's licence;
 - identity card;
 - visa details.
 - Bank account details.
 - Educational history including but not limited to the person's:
 - current qualifications;
 - grades;
 - institution/s studied at;

- most recent study experience or work history.
- (c) Interact with the College, such as:
- i. making enquiries and comments in the web pages they visit or when they contact the College by email, telephone or in person;
 - ii. booking an appointment with the College or to attend an event, and engaging with the College in respect of that appointment /event.
- (d) Engages with the College on through the website or social media platforms, where information may be gathered by the use of 'cookies' in a person's web browser.
- (e) Engages with the College for support during studies (a range of academic and non-academic support and referrals).
- (f) Has given a third-party permission to share information about the individual in question with the College.
- (g) Engages with the College's online learning tools and attends online delivery of academic classes through online webinar platform tools.
- (h) Is a new employee. In such instances the College collects personal data throughout the period of employment with the College.

Government Reporting Data

- (4) When students enroll into accredited programs and when staff gain employment at ACPE, the College is obliged to collect certain data for government reporting.
- (5) Government reporting data includes who participants are, where they study or work and what they study or their role. This includes:
- (a) age, sex and other demographic information;
 - (b) Indigenous and disability information;
 - (c) geographic location;
 - (d) type of provider (for example, government or private);
 - (e) educational background relevant to studying or working at ACPE;
 - (f) location of training delivery;
 - (g) enrolments in units of competency, as part of a qualification, and modules as part of courses;
 - (h) how a course was studied (for example, classroom, workplace or online);
 - (i) how a course was funded;
 - (j) the results obtained for unit/module (outcome);
 - (k) role at the College; and
 - (l) experience relevant to working at ACPE.
- (6) The College keeps records about individual's attendance (particularly students) at events or training/education sessions and progress through a study program.

- (7) When collecting personal information, ACPE will take reasonable steps to inform the individual of the following:
- (a) the identification of the College and its contact details;
 - (b) how the individual may obtain access to his or her personal information;
 - (c) purposes for which the personal information is collected;
 - (d) to whom the personal information will be disclosed; and
 - (e) consequences (if any) if the individual does not provide all of the personal information that is being requested.

Capturing images or footage

- (8) The College may capture footage or images of an individual when they:
- (a) Attends the campus which may have CCTV systems operating for the security of both students, visitors and staff. These systems may record an image of the individual during their visit.
 - (b) College students, prospective students, visitors, and staff may be portrayed in photographs, electronic images and video recording of events.
 - Attendees will be asked for consent prior to being photographed.
 - Where events are recorded, the College will prominently display a suitable sign at the entry to the event and where appropriate, prior notice will be included in the session / event documentation.
 - (c) Students may be recorded during online examination sessions or live lecture recordings.

Access to Personal Information

- (9) When individuals request access to their personal information held by the College:
- (a) all official requests for information must be in writing;
 - (b) an identity check is undertaken;
 - (c) information is checked to ensure there are no grounds to withhold the information (according to the Privacy Act). Where access to certain details is to be withheld, the College will provide its reasons for this decision in writing to the individual.
 - (d) Once the personal information is prepared and cleared for access, the information will be provided in a form most appropriate to the situation. This will take into account the intention expressed by the individual in their original request, and the de-identification of personal information relating to other parties where necessary.

Use of personal information for marketing purposes (APP 7)

- (10) The College may use personal information (other than sensitive information) for a range of purposes including:
- (a) providing information requested about programs or services offered by ACPE;
 - (b) contacting people who have expressed interest in receiving information through direct marketing and promotional materials, including providing information about new products or services, events and functions;
 - (c) requesting participation in surveys or questionnaires to help the College improve its levels of service and to maximise the opportunities and products it offers; and / or
 - (d) sending electronic messages with updates about products and services (subject to prior consent or where it can be reasonably inferred from existing business or other relationship). All electronic messages will identify ACPE and include the capacity to opt-out.

Opting-out

- (11) Where a person no longer wishes to receive marketing information from the College, a request to have it stopped can be made by:
- (a) phoning **1300 302 867** (ask for Marketing Department); or
 - (b) emailing newstudents@acpe.edu.au and requesting to be removed from marketing communications.
- (12) ACPE provides a **unsubscribe URL link** in all its email communication which, when clicked, allows an individual to automatically be unsubscribed and removed from the College's email marketing database.
- (a) ACPE will keep a record of such requests to ensure people do not receive that information in the future. There may be a short period immediately after opting to unsubscribe (opting-out) that an individual may continue to receive marketing communications while the systems are updated.
- (13) Refer to the *Cookies Statement* on the ACPE website for the list of cookies the College uses and their respective functions.

Related documents

This Procedure should be read in conjunction with but is not limited to:

College policies and procedures:

- Privacy Policy
- Student Misconduct (Non-Academic) Policy
- Grievances, Complaints and Appeals Policy

- Cookies Statement
- Staff Code of Conduct
- Student Code of Conduct
- ACPE Values

Legislation:

- *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs)
- Australian Privacy Principles Guidelines, Office of the Australian Information Commissioner (combined December 2022)
- *Health Records and Information Privacy Act 2002* (NSW) (where applicable)
- *European Union General Data Protection Regulation 2016* (where applicable)

Document Administration

Policy Name	Privacy Procedure
Policy Owner	CEO
Approval Authority	Board of Directors
Approval Date	29 June 2023
Effective Date	As at Approval Date
Next Review #	Three years from the Approval Date
Amendment history	
Version 2:	<p>V1 April 2020: Document developed and implemented.</p> <p>V2 April-May 2023: Updated to new template; compliance check with Privacy Act 1988 (Cth) and associated requirements.</p>

Unless otherwise indicated, this Policy will still apply beyond the Review date