Southern Cross Education Institute
Higher Education

530-538 Victoria Street, North Melbourne, VIC, 3051, Australia.
155-161 Boundary Road, North Melbourne, VIC, 3051, Australia.
41 Boundary Road, North Melbourne, VIC, 3051, Australia.
14-16 Grote Street, Adelaide, SA, 5000, Australia.

Email: info@scei-he.edu.au
Web: www.scei-he.edu.au
Phone: +61 3 9602 4110 (Melbourne) / +61 8 8212 8745 (Adelaide)

# Privacy Policy HEPP34

## PURPOSE

The purpose of this policy is to specify the right of access to, and amendment of, personal information collected by the Southern Cross Education Institute (Higher Education).

## SCOPE

This policy applies to all staff, students, contractors and any other third party at Southern Cross Education Institute (Higher Education) who collects or manages personal information on its behalf.

## DEFINITIONS

| | |
|---|---|
| Personal Information | Information or an opinion about an identified individual, or an individual who is reasonably identifiable:<br>1. whether the information or opinion is true or not; and<br>2. whether the information or opinion is recorded in a material form or not. |
| SCEI-HE | Southern Cross Education Institute (Higher Education) |
| Sensitive Information | 1. Information or an opinion about an individual's:<br>○ racial or ethnic origin;<br>○ political opinions;<br>○ membership of a political association;<br>○ religious beliefs or affiliations;<br>○ philosophical beliefs;<br>○ membership of a professional or trade association;<br>○ membership of a trade union;<br>○ sexual preferences or practices;<br>○ criminal record;<br>○ that is also personal information; and<br>○ physical or mental disability or special needs.<br>2. Health information about an individual; or<br>3. Genetic information about an individual that is not otherwise health information. |

## POLICY

**1. Collection and Management of Personal Information**

1.1 SCEI-HE collects personal information to enable it to function effectively. Any personal information collected by SCEI-HE is managed in accordance with the Privacy Act 1988.

1.2 SCEI-HE is committed to an open environment that enables the students and staff to access documents that contain their own personal information without the need to make a formal request.

1.3 SCEI-HE collects the following types of personal information:

1.3.1 student records, such as enrolment, academic performance, graduation, welfare information;

1.3.2 employment records, such as recruitment and appointment, leave, payroll and superannuation information, performance management and discipline;

1.3.3 financial and business records;

1.3.4 information technology records; and

1.3.5 other records such as Board and Committee membership, contact and personal details.

1.4 Day-to-day access to the personal information of others is restricted to staff in the department who require access, e.g. Human Resources staff have access to employment records.

1.5 Personal data will also be used to assist in the provision of the following activities and services:

1.5.1 education;

1.5.2 employment (references, sickness records);

1.5.3 support services;

1.5.4 statutory, statistical and questionnaire returns;

1.5.5 financial records; and

1.5.6 security and crime prevention.

**2. Use of personal information for marketing purposes**

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2.1 SCEI-HE may use personal information for marketing purposes, including:
- 2.1.1 the provision of information requested about the courses offered at SCEI-HE; and
- 2.1.2 contacting individuals who have expressed interest in receiving information through the use of direct marketing and promotional materials, including the provision of information about new courses, events, news, and course enrolment periods.

2.2 SCEI-HE may request participation in surveys or questionnaires to assist in the quality assurance and improvement of its courses, processes, policies and service and to maximise the opportunities and products it offers.

2.3 Where consent has been provided, SCEI-HE may send electronic messages with updates on courses, services, events or news. Individuals may opt out of receiving marketing communications at any time by contacting Student Administration or using the unsubscribe option provided in electronic messages.

**3. Storage and Cybersecurity Measures**

3.1 We store personal information in a variety of formats, including on databases, in hard copy files and on personal devices, including laptop computers. The security of personal information is of paramount importance to us and we take all reasonable steps to protect the personal information we hold about misuse, loss, unauthorised access, modification or disclosure.

3.2 These steps include:
- 3.2.1 restricting access to information on our databases on a need-to-know basis, with different levels of security being allocated to employees based on their roles and responsibilities;
- 3.2.2 ensuring all employees are aware that they are not to reveal or share personal passwords;
- 3.2.3 ensuring that sensitive information is stored in hard copy files that are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to employees on a need-to-know basis;
- 3.2.4 implementing physical security measures at our premises to prevent break-ins;
- 3.2.5 implementing ICT security system, policy and procedure designed to protect personal information storage on our computer networks;
- 3.2.6 implementing human resources policy and procedure, such as email and internet usage, confidentiality and document security policies, designed to ensure that employees follow correct protocols when handling personal information; and
- 3.2.7 undertaking due diligence with respect to third-party service providers who may have access to personal information, including cloud service providers, to ensure, as far as practicable, that they are compliant with the Australian Privacy Principles or a similar privacy regime.

3.3 Personal information we hold that is no longer needed, or required to be retained by any other laws, is destroyed in a secure manner, deleted or de-identified as appropriate.

3.4 Our website may contain links to other websites. We do not share personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

3.5 In the event of a suspected or actual data breach, including cybersecurity incidents, SCEI-HE will assess the incident in accordance with the Notifiable Data Breaches scheme under the Privacy Act 1988. If the breach is likely to result in serious harm to individuals, SCEI-HE will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required.

**4. Cybersecurity Measures**

4.1 SCEI-HE is committed to protecting personal information against modern cyber threats, including unauthorized access, data breaches, malware, and ransomware attacks.

4.2 Cybersecurity measures include, but are not limited to:
- 4.2.1 3A.2.1 Multi-factor authentication (MFA) for all staff access to sensitive systems;
- 4.2.2 3A.2.2 Regular software updates, patching, and vulnerability scanning;
- 4.2.3 3A.2.3 Encryption of personal information both at rest and in transit;
- 4.2.4 3A.2.4 Regular secure backup of critical data and disaster recovery planning;
- 4.2.5 3A.2.5 Continuous monitoring of systems for suspicious activity;
- 4.2.6 3A.2.6 Formal incident response protocols, including detection, containment, remediation, and reporting;
- 4.2.7 3A.2.7 Periodic cybersecurity audits and risk assessments.

4.3 All staff are required to complete annual cybersecurity awareness training, including phishing and social engineering prevention.

4.4 Third-party service providers with access to SCEI-HE systems or data must comply with these cybersecurity standards.

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**5. Release of Personal Information**

5.1 SCEI-HE has in place mechanisms and normal administrative practices to handle routine requests for access to information, such as academic transcripts, or for alterations to information, such as changes of address.

5.2 Individuals wishing to obtain access to, or amend, information about themselves should contact Student Administration.

5.3 The personal information of staff and students will not be released without their written consent except in the following instances:

5.3.1 where it is a matter of public record (e.g., awards conferred);

5.3.2 where it relates to a person's SCEI-HE contact details as provided through the website;

5.3.3 where requisite information is made available to professional regulatory bodies as part of the registration requirements of those bodies (e.g. teaching regulatory bodies);

5.3.4 where a request is made in accordance with a legislative or statutory provision (e.g. requests by Centrelink for details regarding the enrolment status of students);

5.3.5 where an official written request has been received from a law enforcement agency in relation to a legal process;

5.3.6 where a legally enforceable request or direction has been received (e.g. subpoenas or writs issued by a court); or

5.3.7 where disclosure is necessary to prevent or lessen a serious threat to a person's life, health, safety or welfare, or to public health, safety or welfare.

5.4 A record of all personal information released will be kept. As advised by the Australian Privacy Principles, an individual has the right of access to documents held by SCEI-HE which contain that individual's personal information, and has the right to amend that information, if it is inaccurate, misleading, incomplete or out of date.

5.5 SCEI-HE may refuse access to documents on the grounds that there would be a substantial and unreasonable workload in identifying, locating and collating the volume of documents in question, or the personal details of others is also contained within the documents requested.

5.6 If a request for access or amendment is refused, SCEI-HE will give specific written reasons for the decision and advise the applicant of their rights to appeal against the decision.

**6. Disclosure of Information**

6.1 When required by law, the Institute may disclose personal information held about an individual to:

6.1.1 another provider;

6.1.2 government departments;

6.1.3 medical practitioners;

6.1.4 people providing services to the Institute, including specialist visiting teachers; and

6.1.5 others who have been so authorised.

6.2 Where law enforcement agencies (e.g., the Police) or third parties wish to request personal information regarding a student, then this request must be submitted in writing by an authorised officer, quoting the Act or Statute under which the request is made, and addressed to the Student Administration Manager.

6.3 Where law enforcement agencies (e.g. the Police) or third parties wish to request personal information regarding a member of staff, then this request must be submitted in writing by an authorised officer, quoting the Act or Statute under which the request is made, and addressed to the Human Resources Manager.

**7. Making Requests for Access to Personal Information**

A request by a person for access to their own personal information must be in writing. An applicant should obtain an application form from the Information Privacy web page and post or deliver the application to

Student Administration
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155-161 Boundary Road
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**8. Response to requests for access**

8.1 SCEI-HE is required to acknowledge receipt of the request within 10 working days, to consult with the applicant regarding any difficulties in dealing with the request, and either grant access to the documents or provide specific written reasons for refusing access within 20 working days. Where complex requests require additional time, SCEI-HE will inform the applicant of any necessary extensions within the initial 20 working days.

8.2 If inspection only of documents has been requested, the applicant will be provided with reading facilities. At

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the applicant's request, the SCEI-HE will provide a copy of the documents, where possible, in the format requested.

9. **Charges**
   There is no charge for access to, or amendment of, personal information. There may be charges for copies of documents or other services. Where hardship can be demonstrated, these fees may be waived.
10. **Appeal**
    Under the IP Act (s.25), members of the public have a legally enforceable right to appeal against a refusal by the SCEI-HE to grant access to, or to amend, personal information.
11. **Complaints and Grievances**
    11.1 Individuals who believe their personal information has been mishandled or who are dissatisfied with the handling of their access or amendment requests may lodge a complaint with the Student Administration Manager or Human Resources Manager, as applicable.

| RELATED DOCUMENTS |
|---|
| Records Management Policy and Procedure HEPP33 |

| LEGISLATIVE CONTEXT |
|---|
| Australian Privacy Principles<br>National Code of Practice for Providers of Education and Training to Overseas Students 2018, Standard 3 (Specifically 3.3.6)<br>Privacy Act 1988<br>Higher Education Standards Framework (Threshold Standards) 2021 |

| RESPONSIBILITIES |
|---|
| Human Resources Manager<br>Managing Director<br>Student Administration Manager |

| DOCUMENT AND RECORD CONTROL | |
|---|---|
| **Created** | Oct 2015 (V1.0) |
| **Amended** | V1.1; Sep 2019 (V1.2); May 2020 (V1.3); Feb 2022 (V1.4); Jan 2024 (V1.5), Feb 2025 (V1.6); July 2025 (V1.7); Sep. 2025 (V1.8) |
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| **Last approved by** | Corporate Board (Sep. 2025) |
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