



Privacy Policy

Purpose	Describes rules and procedures associated with complying to legislated privacy principles for students and staff
Key words	Privacy, legislation, records, personal information
Scope	All staff and students – protection and management of personal information.
Related Documents	The Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Amendment Act) made many significant changes to the Privacy Act 1988 (Privacy Act). These changes commenced on 12 March 2014. The Privacy Regulation 2013 , made under the Privacy Act, also commenced on 12 March 2014. Details available from the Australian Government Office of the Australian Information Commissioner at http://www.oaic.gov.au/privacy/privacy-act/privacy-law-reform
Approved by	Board of Directors
Approval date	
Start date	1 May 2010
Last Review date	July 2016
Version	2.1

Policy Aim

This policy was formulated to communicate and make transparent company rules regarding adherence to Commonwealth privacy legislation. It is based on the original 10 principles and reviewed against the 13 new harmonised Australian Privacy Principles (APP) to ensure compliance.

1. Open and Transparent Management of Personal Information

This policy contains all relevant information. This privacy policy is made available upon request. Personal information held by eHe is in accordance with the Data Provision requirements as stipulated in the National VET Quality Framework.

2. Anonymity & Pseudonymity

No individual wanting an eHE relationship will have the option to remain anonymous in accordance with the VET Quality Framework legislation.

3. Collection of Solicited Personal Information

Only personal information necessary for eHe to service its customers and meet its business operational requirements is collected and managed. This data collection is required to meet eHE's student and staff credentialing authentication requirements in accordance with the VET Quality Framework – legislative requirements for Registered Training Organisation (RTO) and Non Award Higher Education providers.



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Such personal data collection occurs at the time of enrolment or staff appointment and is obtained directly from the person concerned. All personal information is entered and stored in eHe's enterprise system.

Where personal information needs to be collected from someone else, as is the case for authentication of stated credentials, eHE undertakes to inform the person concerned.

All individuals are provided with the facility to enable them to access and maintain this set of personal information via web access to their own profile account.

eHE will only collect or hold known sensitive information with the consent of the person concerned when necessary for operational purposes.

4. Unsolicited personal information

Not applicable

5. Notification of the collection of personal information

If this highly unlikely instance ever occurs, eHe will notify individuals where information about them is provided by someone else.

6. Personal Data Use and Disclosure

No personal data will be disclosed to others for purposes other than the primary purpose of collection or a purpose directly related without the authority of the person concerned. This includes in situations where personal information needs to be provided for the purpose of prevention, detection, investigation or remedying of improper conduct. Written notes of such disclosures will be kept.

7. Direct Marketing

eHe may make use of personal information it has collected directly from its clients for its own direct marketing purposes.

8. Crossborder disclosure of personal information - data flows

eHE is a company operating nationally and globally. Personal information may need to cross borders as a requirement for the provision of its services to the benefit of the individual concerned to meet eHE's contractual requirements. eHE takes reasonable steps to ensure that the information it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with this policy or the Australian Privacy Principles.



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9. Adoption, use or disclosure of Government related identifiers.

Individual Student identifiers are assigned and used by eHE for the purpose of student record management. Unique student identifiers will be used via eHe's enterprise system once this becomes a legislated requirement.

10. Data quality – integrity of personal information

Responsibility for ensuring all personal information held by eHE is up to date remains with the person concerned.

11. Data security - Use or disclosure of personal information

eHE will take all reasonable steps to protect personal information held from misuse, loss and from unauthorised access, modification or disclosure. When student records need to be disposed of eHE will take reasonable steps to destroy or permanently de-identify personal information no longer needed for any purpose or related purpose for which the information was collected.

12. Access to personal information–

Access is restricted to the individual and specified eHE staff on a need to know basis.

13. Correction of personal information

eHE provides the means and has the expectation that all individuals associated with eHE will ensure that all personal information held about them is correct via updating their own profiles on-line. Corrections may also be made by eHe authorised staff at the request of the individual or to rectify any identified errors.