



# Privacy Policy

## Purpose

The purpose of this policy is to outline how Victorian School of Commerce (VSC) satisfy legal responsibilities in privacy protection for its staff, students and other stakeholders. It ensures that information is kept secure and embodies VSC's commitment to protecting the personal information held.

## Scope

The Privacy Policy covers all staff for VSC in either a permanent or sessional role and contractors. It also covers all students both existing and prospective as well as other stakeholders.

## Policy

Students, staff and other stakeholders are entitled to the protection of their privacy. VSC recognises its obligation regarding the collection, storage and use of personal information and will take necessary measures to ensure privacy is protected. VSC is committed to safeguarding the privacy of personal information in relation to its students, staff and other stakeholders of VSC.

### Collection of personal information

Personal information may be collected directly by VSC, or by people or organisations acting on VSC's behalf (e.g. contracted service providers). It may be collected directly from an individual, or on behalf from an authorised representative.

VSC may also obtain personal information collected by other Australian Government agencies, state or territory governments, other third parties, or from publicly available sources. This will only occur where an individual consents, where it is unreasonable or impractical to collect the information only from an individual or where VSC required or authorised to do so by law.

VSC is also authorised to collect personal information under a range of Acts that VSC administer, for example:

- [\*A New Tax System \(Family Assistance\) Act 1999\*](#)
- [\*A New Tax System \(Family Assistance\) \(Administration\) Act 1999\*](#)
- [\*Australian Education Act 2013\*](#)
- [\*Education Services for Overseas Students Act \(ESOS\) 2000\*](#)
- [\*Higher Education Support Act 2003\*](#)

VSC will also collect personal information on behalf of the Tertiary Education Quality and Standards Agency (TEQSA) through the Higher Education Information Management System (HEIMS) and HELP IT System (HITS). VSC will provide this information back to TEQSA for it to use for the purposes of administering the *Higher Education Standards Framework (Threshold Standards) 2021*.

Under the Australian Privacy Principles (APPs) contained in the Privacy Act, VSC will only collect information for a lawful purpose that is reasonably necessary or directly related to one or more of VSC's functions and activities, or where otherwise required or authorised by law.



When personal information is collected, VSC is required under the APPs to notify the individual of a number of matters. These include the purposes for which VSC collects the information, whether the collection is required or authorised by law, and any person or body to whom VSC usually discloses the information, including if those persons or bodies are located overseas. VSC usually provides this notification by including privacy notices on paper-based forms and online portals.

VSC collects and holds a broad range of personal information in records relating to:

- employment and personnel matters for VSC staff and contractors (including security assessments);
- the performance of VSC's legislative and administrative functions;
- the management of fraud and compliance investigations;
- the management of audits (both internal and external);
- correspondence from members of the public to VSC and the Ministers and Parliamentary Secretaries;
- complaints (including privacy complaints) made and feedback provided to VSC;
- requests made to VSC under the [Freedom of Information Act 1982](#) (Cth); and
- the provision of legal advice by internal and external lawyers.

This personal information may include but is not limited to:

- individual's name, address and contact details (e.g. phone, email and fax);
- photographs, video recordings and audio recordings of the person;
- information about the individual's personal circumstances (e.g. marital status, age, sex, gender, occupation, accommodation and relevant information about individual's partner or children);
- information about the individual's financial affairs (e.g. payment details, bank account details and information about business and financial interests);
- information about the individual's identity (e.g. date of birth, country of birth, passport details, visa details, driver's license);
- information about the individual's employment (e.g. work history, referee comments, remuneration);
- information about the individual's background (e.g. educational qualifications, the languages you speak and English proficiency);
- government identifiers (e.g. Centrelink Reference Number or Tax File Number);
- information about entitlements under Australian Government legislation.

### **Tax File Numbers (TFN)**

VSC may collect TFNs for the following purposes:

- to make payments of salaries and wages to eligible employees and contractors;

An individual is not legally obliged to quote their TFN but there may be financial consequences where the person chose not to quote it.



## How personal information is collected

VSC collects personal information through a variety of channels, which may include forms or notices, online portals, social media websites and accounts, electronic or paper correspondence and from data sharing, matching or linkage arrangements with other Australian Government and state and territory agencies.

VSC may also collect personal information if someone:

- communicates with VSC by telephone, mail, email, fax or SMS;
- attends a face to face meeting or event conducted by VSC or VSC's contractors;
- uses VSC's website;
- interacts with VSC on social media platforms.

By signing paper documents or agreeing to the terms and conditions and disclaimers for electronic documents an individual is consenting to the collection of any personal information they provide VSC.

## Purposes for which information is collected, held, used and disclosed

VSC collects, holds, uses and discloses personal information for a variety of different purposes including:

- performing management, employment and personnel functions in relation to VSC's staff and contractors;
- performing VSC's legislative and administrative functions;
- policy development, research and evaluation;
- data sharing or data integration with other Australian Government agencies, including but not limited to, data sharing or data integration with the Australian Bureau of Statistics for the Multi-Agency Data Integration Project and the Data Integration Partnership for Australia;
- complaints handling;
- administering requests received by VSC under the *Freedom of Information Act 1982* (Cth);
- preventing, detecting, investigating or dealing with fraud or corruption against the Commonwealth;
- program management;
- maintaining effective working relationships with state and territory governments, non-government education authorities and providers, universities and other relevant stakeholders;
- contract management; and
- management of correspondence with the public.

VSC uses and discloses personal information for the primary purposes for which it is collected. A person will be given information about the primary purpose of collection at the time the information is collected.

VSC will only use your personal information for secondary purposes where VSC is able to do so in accordance with the Privacy Act. This may include where a person has consented to this



secondary purpose, or where the secondary purpose is related (or if sensitive information, directly related) to the primary purpose and the person would reasonably expect VSC to use or disclose the information for the secondary purpose, where it is required or authorised by law or where a permitted general situation exists such as to prevent a serious threat to safety.

Likely secondary purposes for which VSC may use or disclose an individual's personal information include but are not limited to: quality assurance, auditing, reporting, research, evaluation and analysis, data sharing, data integration and promotional purposes.

### **Personal information – data quality and security**

VSC makes every effort to ensure that the personal information which it collects, uses or discloses is accurate, complete and as up-to-date as possible.

The accuracy of that information will depend to a large extent on the staff provide. VSC regularly provides staff with the opportunity to advise VSC of any correction which needs to be made to their personal information. Staff of VSC can ensure that their personal information is accurate by:

- Advising VSC of any error in the personal information held by VSC; and
- Keeping VSC informed of changes to their personal information.

VSC seeks to protect personal information from misuse, loss, unauthorised access, modification or disclosure.

VSC has appropriate security measures aimed at protecting personal and health information regardless of whether the information is stored electronically or physically. VSC will upgrade its electronic data storage system to ensure more security and privacy and will regularly monitor and maintain the system.

VSC will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose. VSC will only dispose of such information in accordance with the standards and disposal schedule of the *Public Records Act 1973*.

VSC provides access to its website without a requirement for disclosure of identity or personal information. VSC will not collect or record personal information, other than information voluntarily supplied.

Cookies are not used on VSC's site. A cookie is a block of data that is shared between a web server and a user's browser and is used to record facets of the user's experience regarding the website or web service activity.

Click-stream data is non-personal information automatically generated by the web server for system administration purposes. To the extent that any clickstream data could make a person identifiable, VSC will not try to identify someone from such data unless necessary for the investigation of unlawful activity or is otherwise permitted under the *Privacy and Data Protection Act 2014* or the *Health Records Act 2001*.



## Related policy instruments

*Academic Documentation and Graduation Policy*  
*Academic Integrity Policy*  
*Academic Integrity Procedure*  
*Academic Progression and At-Risk Policy*  
*Academic Progression and At-Risk Procedure*  
*Admissions Policy*  
*Admissions Procedure*  
*Bullying, Discrimination and Harassment Prevention Policy*  
*Code of Conduct*  
*Marketing and Student Recruitment Policy*  
*Recruitment and Selection Policy*  
*Staff Complaints and Appeals Policy*  
*Staff Complaints and Appeals Procedure*  
*Student Complaints and Appeals Policy*  
*Student Complaints and Appeals Procedure*  
*Records and Information Management Policy*

## Related documents and legislation

*Privacy and Data Protection Act 2014 (Vic), Health Records Act 2001 ('the Acts'), Public Records Act 1973.*  
[\*A New Tax System \(Family Assistance\) Act 1999.\*](#)  
[\*A New Tax System \(Family Assistance\) \(Administration\) Act 1999.\*](#)  
[\*Australian Education Act 2013.\*](#)  
[\*Education Services for Overseas Students Act \(ESOS\) 2000.\*](#)  
[\*Higher Education Standards Framework \(Threshold Standards\) 2021 Higher Education Support Act 2003.\*](#)  
[\*Freedom of Information Act 1982\*](#) (Cth),  
[\*Tertiary Education Quality and Standards Act 2013.\*](#)

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## Administration

### Revision History

Version	Approval date	Approval body	Review date
0.1	04/03/2019	Board of Directors	
0.2	30/06/2020	Board of Directors	
1.0	18/06/2021	Board of Directors	30/06/2022