

## 13. Privacy

### Introduction

GSA recognises the importance of protecting the privacy and rights of graduates in relation to their personal information.

We respect individuals' right to protection of their personal information under the Commonwealth *Privacy Act 1988* and we comply with all of the requirements in respect to the collection, management and disclosure of personal information.

### Purpose

The purpose of this document is to provide a framework for GSA in respect to the collection, management and disclosure of personal information.

### Authorisation

*Chief Executive Officer to authorise policy;*

*Managers to implement operational strategies.*

### Definitions

Personal information has the meaning given to it in the Commonwealth *Privacy Act 1988*. In general terms, it is any information that can be used to identify an individual. This may include name, address, telephone numbers, email addresses, photographs and other details. If any information is collected and linked to other information that identifies a person, that information is also considered personal information.

### Policy

GSA collects and administers a range of personal information for the purposes of delivering services to the graduates. The organisation is committed to protecting the personal information it collects, holds and administers.

GSA recognises the right of individuals to have their personal information collected, used, managed and stored in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies.

GSA is bound by the *Privacy Act 1988* (and the recent amendments made to that Act by the *Privacy Amendment (Enhancing Privacy Protection) Act*), the *Privacy and Data Protection Act 2014*, as well as other laws which impose specific obligations when it comes to handling information.

In broad terms this means that we:

- o collect only information which the organisation requires for its primary function;
- o ensure that stakeholders/graduates are informed as to why we collect the information and how we administer the information gathered;
- o use and disclose personal information only for the primary purpose of collection, a directly related purpose, or for another purpose with the person's consent to that use or disclosure;
- o store personal information securely, protecting it from unauthorised access; and
- o provide stakeholders/graduates with access to their own information, and the right to seek its correction

## Commitments

### 1. Collection

We only collect information that is necessary for the performance and function of GSA. We will notify graduates/stakeholders about why we collect the information and how it is administered in specific written privacy collection statements for each program area.

We will notify stakeholders/graduates that their personal information is accessible to them.

### 2. Consent

No personal information of a graduate will be collected without first gaining the graduate's consent.

Graduate's consent is completely voluntary and can be withdrawn at any time.

Withdrawal of consent means that no future information will be recorded after the graduate's consent has been withdrawn.

However, if consent for GSA to collect personal information is denied, we may not be able to provide all the services to that graduate.

### 3. Use and Disclosure

We collect, hold, use and disclose stakeholders/graduates' personal information for the following purposes:

- o to deliver our services;
- o for the administration, planning, service development and quality control of our services;
- o to communicate, answer queries and provide information or advice;
- o to update our records and keep details current;
- o to process and respond to any complaint received by an individual; and

- o to comply with any law, rule, regulation, decision or direction of a regulator, or in co-operation with any government authority.

For any other uses we will obtain direct consent from the graduate.

#### **4. Data Quality**

We take all reasonable steps to ensure the information we collect is accurate, complete, up-to-date, and relevant to the functions we perform.

We may hold stakeholders/graduates personal information in either electronic or hard copy format.

#### **5. Data Security and Retention**

We take all reasonable actions to safeguard the information we collect and store against misuse, loss, unauthorised access, modification or disclosure (except where disclosure is otherwise required by law).

We destroy records securely in accordance with relevant legislation and regulatory requirements when no longer required.

#### **6. Openness**

We will ensure staff, volunteers, members of the public & stakeholders/graduates are aware of GSA *Privacy Policy* and its purposes.

We will make this information freely available in relevant publications and on the organisation's website.

Our staff are trained in the appropriate secure collection of personal information and can provide further information to stakeholders/graduates on request.

#### **7. Access and Correction**

We acknowledge individuals have a right to seek access to information held about them.

Graduates may request access to any personal information we hold about them at any time by contacting us using the details at the bottom of this policy, or by contacting the Managers. GSA will provide a suitable means of accessing this information, this may include providing photocopies or by allowing access to view the file at our office.

There may be instances where we cannot grant access to the personal information we hold. For example, in situations where granting this access would interfere with the privacy of others or would result in a breach of confidentiality. If this happens, we will give written reasons for the refusal to access.

If graduates believe that the personal information we hold is incorrect, incomplete, misleading or inaccurate, they may request for it to be amended. We will consider if the information requires amendment. If we do not agree that there are grounds for

amendment, we will add a note to the personal information stating that the client disagrees with it.

We will not charge for this request to access or for making corrections to personal information.

## **8. Anonymity**

We will give staff and stakeholders/graduates the option of not identifying themselves when completing evaluation forms or opinion surveys.

## **9. Disclosing Personal Information to Third Parties**

We will only release personal information about a person to another service provider with that person's expressed permission. For personal information to be released, the person concerned must sign a release form.

GSA is required by funding bodies and other regulatory agencies to collect personal information on graduates and report back this information. In these situations, graduates will be given a specific privacy collection statement detailing which government agency or body is involved and seeking consent to do this.

GSA contracts external organisations for IT support services, data entry services and payroll processing to University of Melbourne Business services. We may also employ other external organisations in the future. In these situations, individuals whose information will be disclosed to a third party will be advised in writing of the specific details and their consent will be sought. GSA takes all reasonable actions to ensure that these external organisations abide by the standards of this Privacy Policy and the applicable legislation.

We do not disclose staff, volunteers, stakeholders/graduates or any other individuals' personal information to anyone outside of Australia.

We do not use staff, volunteers, clients or any other individuals' personal information for direct marketing, or disclose any personal information to other organisations for the purposes of direct marketing.

Staff, volunteers, stakeholders/graduates personal information will never be shared, sold, rented or disclosed other than as described in this policy.

## **10. Referrals to Other Organisations**

GSA staff may refer members of the public or clients to other external organisations or provide information regarding other services available in the community. Our website may contain links to other websites operated by external organisations. In these situations, we make no representations or warranties in relation to the privacy practices of any other party. Staff, volunteers, and stakeholders/graduates are advised to seek their own information regarding the privacy policies of external organisations we may have given a referral to or information about.

## Complaints

Any person who feels their privacy has been breached by GSA can contact us using the contact information below and provide details of the incident so that it can be investigated.

Our procedure for investigating and responding to alleged privacy breaches is:

1. Contain the alleged breach and do a preliminary assessment
2. Evaluate the risks associated with the potential breach
3. Notification of any individuals affected and/or appropriate regulatory bodies
4. Prevent future breaches

Given the varied nature of privacy breaches, actions will be proportional and appropriate to the specific details of each individual situation.

Privacy breaches are not limited to malicious actions, such as theft or 'hacking', but may arise from internal errors or failure to follow information handling policies that cause accidental loss or disclosure.

We will treat all complaints confidentially and aim to resolve within a timely and appropriate manner.

## Responsibility

The GSA Council is responsible for adopting this policy.

The GSA Board Members, Chief Executive Officer and all staff members, contractors and volunteers are responsible for the implementation of this policy.

The Chief Executive Officer is responsible for monitoring changes in Privacy legislation and for reviewing this policy as and when the need arises.

We may change this Privacy Policy from time to time. Any updated versions will be available on our website.

## Contact Us

If you have any questions about this policy, or any concerns or complaints, please contact our Privacy Officer using the details below:

Sajal Goundar, CPA  
Manager – Business Operations & Finance  
[sajal.goundar@gsa.unimelb.edu.au](mailto:sajal.goundar@gsa.unimelb.edu.au)  
[03] 834 45703 extn

## Related Documents

- Code of Conduct & Ethics
  - Respectful Workplace Policy
  - Internet and Email Use Policy
  - Customer Service Charter
-