



## PRIVACY POLICY

<b>Policy number</b>	COR 1.01
<b>Policy name</b>	Privacy Policy (Issue Three)
<b>Applicability</b>	All Bond University Staff, Students, and Visitors
<b>Policy owner</b>	Company Secretary
<b>Contact person</b>	Company Secretary
<b>Policy status</b>	Approved Policy
<b>Date of approval</b>	2 March 2005
<b>Date last amended</b>	18 September 2020
<b>Date last exposed</b>	November 2017
<b>Date last reviewed</b>	18 September 2020
<b>Date of next review</b>	18 September 2023
<b>Related policies</b>	Information Security Policy ( <a href="#">TEC 1.05</a> ) <a href="#">The Privacy Act 1988 (Commonwealth)</a> <a href="#">Australian Privacy Principles</a>

### 1. OVERVIEW

The University is committed to protecting [Personal Information](#) provided by individuals. The University will collect, manage, use and disclose Personal Information in accordance with this Policy, the Australian Privacy Principles and any other relevant legislation.

### 2. THE POLICY

#### 2.1 Legislation

The Privacy Act, establishes a comprehensive national privacy scheme for private sector organisations by setting minimum standards for the handling of Personal Information by organisations.

The Privacy Act outlines core principles (Australian Privacy Principles) that are the base line privacy standards Bond University will comply with in relation to the Personal Information it holds.

Information held by the University which is directly related to a current or former employment relationship or employee [Record](#) (such as information about leave entitlements, training, etc) is exempt from the Privacy Act.

#### 2.2 Collection

The University only collects Personal Information that is reasonably necessary for its functions and activities. Personal Information will only be collected in a manner that is fair, lawful and not unreasonably intrusive.

The types of Personal Information collected by the University include contact details, transactional and financial information, and employment details. When collecting Personal Information, the University will take reasonable steps to inform individuals:

- that the University is collecting Personal Information about them;
- of the purposes for which the Personal Information is being collected;
- of the organisations to which Personal Information is usually disclosed;
- of what happens if Personal Information is not provided;
- whether the Personal Information is likely to be disclosed to overseas recipients and if so, the countries in which such recipients are likely to be located, if it is practicable to do so; and
- of how to access or seek correction of Personal Information.

Wherever reasonable and practicable, Personal Information about an individual will only be collected directly from that individual. If Personal Information is collected about an individual from someone else, the University will take reasonable steps to inform the individual concerned. The University may collect Personal Information from another university or agent, for the purposes of administering the individual's enrolment, employment or relationship.

### 2.3 Use and Disclosure

The University will generally only use or disclose Personal Information for the purposes for which it was collected or a related secondary purpose. Personal Information may be disclosed to:

- service providers, who assist the University in operating its business (such service providers are required to comply with the University's Privacy Policy in how they handle Personal Information);
- a purchaser of the assets and operations of the University's business, providing those assets and operations are purchased as a going concern;
- its related entities;
- other universities for the purposes of administering the individual's enrolment or transfer to another university;
- in the case of untrue or misleading information, the Universities Australia (UA) or any UA member institution;
- the nominated next of kin or emergency contact where, in the opinion of one of the following officers, an emergency situation has taken place or the disclosure of specific information is required to prevent or lessen a serious and imminent threat to the health, safety or wellbeing of the student or other persons:
  - University Registrar
  - Director, Student & Academic Services
  - Director of Commercial Services
  - Executive Director, Strategy, Systems & People;
  - Executive Dean;
- a specified agent and/or next of kin for the purpose of processing an application made by an individual;
- a specified third party where there is written authority and consent from the student concerned to provide specific information;
- law enforcement agencies who have submitted a written request for disclosure of Personal Information; and
- other Commonwealth and State Governments and Agencies.

University staff may require access to Personal Information held by the University in order to perform University related tasks.

Personal Information will only be disclosed as required.

### 2.4 Security

All reasonable measures will be taken to ensure Personal Information is stored safely to protect it from misuse, loss, unauthorised access, modification, or disclosure, including electronic and physical security measures.

The University will ensure that Personal Information is kept for no longer than is necessary for the purposes for which it may lawfully be used. Records will be disposed of securely and in accordance with any requirements for the retention and disposal of Personal Information.

### 2.5 Access and Correction

The University will provide an individual with access to Personal Information about them upon receipt of a written request sent to the contact details provided below. The University will endeavour to acknowledge such requests within 14 days of its receipt and provide requested information within 30 days. A fee may be charged to cover processing of such requests.

The University may decline a request for access to Personal Information where:

- providing access would pose a serious threat to the life or health of an individual;
- providing access would have an unreasonable impact upon the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the request is not a genuine request for Personal Information and is made for purposes other than a permitted reason under the Privacy Act;
- the information relates to existing or anticipated legal proceedings between the University and the individual, and the information would not be accessible by the process of discovery in those proceedings;
- providing access would reveal evaluative information about a commercially sensitive decision-making process;
- providing access would reveal the intentions of the University in relation to negotiations with the individual in such a way as to prejudice those negotiations;

- providing access would be unlawful;
- restricting access is required under law;
- the University has reason to suspect that unlawful activity or misconduct relating to its functions or activities has been, is being or may be engaged in, and giving access would be likely to prejudice the taking of appropriate action in the matter;
- providing access would be likely to prejudice an investigation of possible unlawful activity; or
- providing access would be likely to prejudice the activities of enforcement bodies.

If an individual believes inaccurate or outdated information is being held about them, they should notify the University immediately by contacting it at the contact details below. Bond University will take reasonable steps to correct the information so that it is accurate, complete, up to date, relevant and not misleading.

## 2.6 Complaints about Breaches of Privacy

If an individual considers that the University has breached the Australian Privacy Principles, the individual may make a complaint in writing to the University at the contact details in Section 6 below.

The University will endeavour to acknowledge such requests within 14 days of its receipt and propose a time line for a response

## 2.7 Privacy Compliance Manual

Bond University has developed a Privacy Compliance Manual to ensure standards regarding management of Personal Information, as outlined in the Privacy Act, are achieved. The manual, based on the Australian Privacy Principles, outlines minimum procedures to be followed when handling Personal Information belonging to individuals.

A brief overview of how Bond University complies with these standards is provided in this Policy document. For more detailed information, including procedures associated with each of the Australian Privacy Principles, the Privacy Compliance Manual should be consulted.

## 3. RELATED PROCEDURES

### 3.1 Training

Training will be provided for all staff as required.

All staff that collect or use Personal Information of students and staff are required to attend training.

### 3.2 Procedures

As required, from time to time, the Privacy Officer may issue procedures that deal with requests to the University from third parties, for the release of Personal Information in its possession.

## 4. DEFINITIONS

**Personal Information** Personal Information is defined in the Privacy Act to mean information or an opinion, whether forming part of a database or not, whether true or not and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable (Personal Information).

**Record** A Record is defined in the Privacy Act to include:

- a document;
- an electronic or other device;

but does not include, among other things, a generally available publication.

## 5. RELATED GUIDELINES AND FORMS

Bond University Privacy Compliance Manual

[Australian Privacy Principles Guidelines](#)

Bond University Data Breach Response Plan

[Procedure for Disclosure of Personal Information to Law Enforcement and other External Agencies](#)

## 6. CONTACT DETAILS

Privacy Officer: [privacy@bond.edu.au](mailto:privacy@bond.edu.au)