

Privacy Procedure - Education

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1. Introduction

1.1 Purpose

The Privacy Act 1988 (Privacy Act) is an Australian law that regulates the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information.

This procedure aims to ensure Mater Education's adheres to its responsibilities in handling, using and managing personal information in accordance with the Australian Privacy Principles (APPs) which are contained in Schedule 1 of the Privacy Act 1988 (Privacy Act).

1.2 Scope and context

This procedure applies to personal information in accordance with Australian Privacy Principle 1 - Open and transparent management of personal information.

1.3 Governing policy

MPPL-04252 Information Privacy Policy – State Wide

2. Procedure requirements

The following procedures are to be followed.

2.1 Collection of personal information

Under the APPs, we will only collect information for a lawful purpose that is reasonably necessary or directly related to one or more of our activities, or where otherwise required or authorised by law.

2.2 Types of personal information collected

We collect and hold a broad range of personal information in records which may include (but not limited to):

- your name, address and contact details (e.g. phone, email and fax);
- photographs, video recordings and audio recordings of you;
- information about your personal circumstances (e.g. marital status, age, sex, gender, occupation);
- information about your identity (e.g. date of birth, country of birth, passport details, visa details, driver's license);
- information about your background (e.g. educational qualifications, the languages you speak and your English proficiency);
- information about assistance provided to you under funding arrangements;
- Tax file number for the purposes of VET Student Loans.



2.3 Collection of personal information

In carrying out our activities we may collect personal information that is sensitive information (see definitions). The APPs impose additional obligations on us when collecting, using or disclosing sensitive information. We may only collect sensitive information from you:

- where you provide your consent; or
- where required or authorised by law; or
- where a permitted general situation exists such as to prevent a serious threat to safety.

2.4 Collecting personal information from children or young people

In carrying out our activities we may collect personal information about children and young people, either directly from them, through their parents or guardians, or from their education providers. Where children and young people are over the age of 16, our general policy is to collect information directly from them as they are likely to have the capacity to understand any privacy notices provided to them and to give informed consent to collection. For children under the age of 16, or where capacity to provide consent is at issue, our policy is that a parent or guardian will be notified and their consent sought.

2.5 Collection of unsolicited information

Sometimes personal information is not sought by us but is delivered or sent to us by either the individual or a third party without prior request.

Where unsolicited information is received by us, we will, within a reasonable period, determine whether that information is directly related to one or more of our activities. Where determined, we may, as soon as practicable and in accordance with our Records Management Policy destroy or de-identify the information.

2.6 How we collect personal information

We primarily use forms, online portals and other electronic or paper correspondence to collect your personal information. By signing paper documents or agreeing to the terms and conditions and disclaimers for electronic documents you are consenting to the collection of any personal information you provide to us.

We may also collect your personal information if you:

- communicate with us by telephone, mail, email, fax or SMS;
- attend a face to face meeting or event conducted by us;
- use our website;
- interact with us on our social media platforms.

2.7 Storage and data security

2.7.1 Storage

We hold personal information in a range of paper-based and electronic records, including cloud computing.

Storage of personal information (and the disposal of information when no longer required) is managed in accordance with Mater Education's records management policies and procedures



which incorporate relevant Commonwealth and State Government requirements for records retention.

2.7.2 Data security

We take all reasonable steps to protect the personal information held in our possession against loss, unauthorised access, use, modification, disclosure or misuse.

Access to your personal information held by us is restricted to authorised persons who are employees on a need to know basis.

2.8 Data quality

We take all reasonable steps to ensure that the personal information we collect is accurate, up-to-date, complete, relevant and not misleading.

These steps include responding to requests to correct personal information when it is reasonable and appropriate to do so.

Audits and quality inspections are also conducted from time to time to ensure the accuracy and integrity of information, and any systemic data quality issues are identified and resolved promptly.

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

We collect, hold, use and disclose personal information for a variety of different purposes relating to our activities including:

- performing our legislative and administrative functions;
- policy development, research and evaluation;
- data sharing or data integration with Australian Government agencies;
- complaints handling;
- program management;
- maintaining effective working relationships with state and territory governments, non-government education authorities and providers, universities and other relevant stakeholders;
- policy advice and support to our Board;
- contract management; and
- management of correspondence with the public.

We use and disclose personal information for the primary purposes for which it is collected. You will be given information about the primary purpose of collection at the time the information is collected.

We will only use your personal information for secondary purposes where we are able to do so in accordance with the Privacy Act. This may include where you have consented to this secondary purpose, or where the secondary purpose is related (or if sensitive information, directly related) to the primary purpose and you would reasonably expect us 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 we may use or disclose your personal information include but are not limited to: quality assurance, auditing, reporting, research, evaluation and analysis, data sharing, data integration and promotional purposes.



2.10 Access and correction

Under the Privacy Act, individuals may request access to personal information that Mater Education holds about them.

Individuals may also request that Mater Education correct any personal information about the individual that Mater Education holds. Mater Education will only update the information if it is satisfied the information it holds is inaccurate, out-of-date, incomplete, irrelevant or misleading. If so satisfied, Mater Education will take reasonable steps to correct that information.

Mater Education will provide a response to any request for access to or correction of personal information within 30 days.

2.11 Our website

When you access Mater Education web site we may record your server address, domain name, the date and time of your visit, the pages viewed, the information downloaded and the frequency of visits.

Mater Education may also record information about the types of browsers that are being used to visit our website. Mater Education uses this information for website and system administration including monitoring to prevent security breaches, to assist Mater Education in further development and to improve the functionality of the site.

Mater Education website may have links to other websites from time to time. Once you go to another site you are subject to the privacy policy of the new site.

2.12 Electronic communication

There are inherent risks associated with the transmission of information over the internet, including via email. You should be aware of this when sending personal information to us via email or via our website or social media platforms. If this is of concern to you then you may use other methods of communication with us, such as post, fax or telephone (although these also have risks associated with them).

We only record your email address when you send a message to us or subscribe to one of our mailing lists. Unless otherwise notified, any personal information, including email addresses, will only be used or disclosed for the purpose for which it was provided.

2.13 Surveys

We use different technologies to survey respondents voluntarily about a range of matters relevant to our activities. Wherever possible, we will not seek your personal information as part of our surveys, but sometimes this is necessary. Further, in providing this service, the supplier of the technology that we use may collect personal information.

Mater Education will only use this information if you choose to respond to our invitation to participate in a survey, and for the purpose of receiving and analysing your answers.



2.14 Direct marketing

Unless you tell us otherwise, we may use this information to bring you products and services we believe will benefit you and/or your business. The first time you receive information about a new product or service you will be given the option to immediately opt out of receiving future offerings of the item in question.

Unless otherwise provided in this Privacy Statement, and in accordance with the Privacy Act and APPs, Mater Education retains the right to use your personal information for direct marketing purposes where:

1. you have provided consent to do so
2. it is within your reasonable expectations.

In each direct Mater Education marketing communication, we will include:

- a statement on the relevant piece of marketing material notifying you of your right to opt out of receiving further direct marketing communications
- a simple means for you to opt out of receiving further direct marketing communications of that kind.

Should you choose to opt out, we will immediately stop using your personal information for direct marketing purposes. To opt out, please contact the relevant Manager as set out below.

2.15 Complaints

Complaints about breaches of privacy relating to personal information should follow Mater Education's Complaints and Appeals Procedure.

2.16 Contact us

If you wish to:

- query how your personal information is collected, held, used or disclosed by us;
- ask us questions about this privacy policy;
- request access to or seek correction of your personal information; or
- make a privacy complaint;

Contact us:

By mail:

Head of Quality and Compliance
Mater Education Limited
Level 5, 14 Stratton Street Newstead
QLD 4006

By email:

educationfeedback@mater.org.au

By telephone:

07 3163 1500 (main reception)

Or visit our **website** <https://www.matereducation.qld.edu.au/contact-us> using the Feedback tab.



3. Definitions

Term	Definition
Personal information	personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not
Sensitive information	sensitive information means: (a) information or an opinion about an individual's: (i) racial or ethnic origin; or (ii) political opinions; or (iii) membership of a political association; or (iv) religious beliefs or affiliations; or (v) philosophical beliefs; or (vi) membership of a professional or trade association; or (vii) membership of a trade union; or (viii) sexual orientation or practices; or (ix) criminal record; that is also personal information; or (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or (e) biometric templates.

4. Related documents

Mater documents

- MPPL-04260 Information Policy - State Wide
- MPPL-04806 Corporate Records Management Standard
- MPPL-04864 Privacy Impact Assessment - PIA – Procedure
- MPPL-01317 MEL Records Retention and Disposal Work Instruction
- MPPL-04863 Privacy Impact Assessment -PIA - Report Template

External documents

- Privacy Act 1988 (the Act)
- Standards for RTOs 2015
- Information Privacy Act 2009 (Qld) (IP Act)



5. Document information

5.1 Earlier revisions

Revision #	Published date	Comment
1.	13 Jun 2019	First version (Document ID: PR-MEL-040042)
1.1	14 Dec 2021	Administrative update: transferred to new template, removal of old metadata, mainly updated section 5 (earlier revisions, inclusion of key contacts and Affirmation); no changes of review cycle, next review due Jun 2022
2	14 Jun 2022	Content Reviewed; Administrative update: item 1.3 governance policy, section 4 related document information; removal of approver and reviewer table; document renamed
2.01-2.03	27 Mar 2024	Administrative update: transferred to MML template

5.2 Key contacts

Author	Head of Quality and Compliance
Owner	Executive Director Mater Education
Subject area	Education, MEL, privacy, personal information, information
Committee	n/a

Affirmation

This governance document is consistent with [Mater's Mission](#).
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