

# Privacy Policy

<b>Supporting plans, policies and procedures</b>	<ul style="list-style-type: none"> <li>• Admissions and Enrolment Policy and Procedure</li> <li>• Records, Data and Information Management and Security Policy</li> <li>• Conferral of Awards and Graduation and Academic Documentation Policy</li> <li>• Academic Integrity and Academic Misconduct Policy and Procedure</li> <li>• Academic Progress and Student At-Risk Policy and Procedure</li> <li>• Bullying, Harassment, Discrimination, Sexual Assault and Sexual Misconduct Policy and Procedure</li> <li>• Code of Conduct, Marketing and Student Recruitment Policy</li> <li>• Recruitment and Selection Policy and Procedure</li> <li>• Staff Complaints and Appeals Policy and Procedure</li> <li>• Student Complaints and Appeals Policy and Procedure, Records</li> <li>• Records, Data and Information Management and Security Policy</li> </ul>
<b>Related Legislation and documents</b>	<ul style="list-style-type: none"> <li>• Higher Education Standards Framework (Threshold Standards) 2021</li> <li>• Tertiary Education Quality and Standards Agency (TEQSA) Act 2011</li> </ul>
<b>Version</b>	<ul style="list-style-type: none"> <li>• 2.0</li> </ul>
<b>Approved by</b>	Board of Directors
<b>Date approved</b>	23 July 2021
<b>Document Review</b>	This document is to be reviewed every two-years at a minimum from the date of final approval

<b>Version</b>	<b>Review Date and Person/Body</b>	<b>Notes</b>
0.1	Draft prepared by CEO and reviewed at 7 January 2020 Board of Directors meeting	
1.0	Approved at the 7 January 2020 Board of Directors meeting	
1.1	Approved at the 28 October 2020 Board of Directors meeting	Minor updates included after further internal and external review
2.0	Reviewed and approved by the Board of Directors via email circulation on 23 July 2021	Updates made following the response to the TEQSA Request for Information 23 July 2021

## Background and Scope

In delivering higher education courses MIHE may collect information from students or prospective students, either electronically or in hard copy format, including personal information that identifies individuals. MIHE may also record various communications between individuals and MIHE. This policy supports MIHE's commitment to protection of personal information. This policy defines how MIHE respects the privacy of information it collects, stores, uses and provides access to information. It ensures how MIHE will satisfy legal responsibilities in privacy protection as it applies to all its directors, board members, committee members, staff, students and contractors.

## Definitions

Refer to Glossary of Terms.

## Policy

MIHE's directors, board members, committee members, staff, students, contractors and other stakeholders are entitled to the protection of their privacy. MIHE recognises its obligation regarding the collection, storage and use of personal information and will take necessary measures to ensure privacy is protected. All personal information is collected for the operations of MIHE. Personal information is collected directly from the individual, although in some cases, a third party such as a family member may also contact MIHE and provide information on the individual's behalf. All students and staff have the right to access their personal information held by MIHE.

This policy has been developed in alignment with the Australian Privacy Principle (APP) guidelines provided by the provided by the Office of the Australian Information Commissioner (<https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/>). All staff members are made aware of the privacy obligations during induction and receive updates, reminders and training as required.

### **Open and transparent management of personal information**

MIHE will manage personal information in an open and transparent way. This includes having a clearly expressed and up to date *Privacy Policy* (this document) that is easily accessible, such as on the MIHE website.

### **Collection, use or disclosure of personal information**

MIHE will collect, use or disclose personal information where it is reasonably necessary for, or directly related to, MIHE's functions or activities for educational, administration and research

purposes. MIHE may typically collect and use information for handling enquiries, admissions, enrolments and administration, providing student services, conducting student assessments, conducting marketing campaigns, budgeting and forecasting, maintaining information technology facilities and transacting with other MIHE related entities.

On rare occasions MIHE may be required by law to use or provide personal information to others for other purposes. In some cases, an individual's consent will be sought to use or provide personal information to others.

MIHE will only adopt or assign a unique identifier (e.g. student or employee numbers) for an individual if it is necessary, authorised by law or with consent. Any transfer of sensitive information outside of MIHE will be managed in accordance with the law. Personal information will be collected from the individual concerned, unless this is unreasonable or impracticable. MIHE will only solicit and collect sensitive information if the individual consents to the sensitive information being collected. When MIHE solicits and collects sensitive information all reasonable steps will be taken to explain the reasons for the sensitive information to be collected; what will be done with the information; and the consequences (if any) if all or part of the information is not provided to MIHE.

### **Quality and security of personal information**

MIHE will ensure that the personal information it collects, uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

If an individual considers their personal information to be inaccurate, incorrect, incomplete, out of date or misleading, they can request that personal information to be amended. There is no charge for making a request to correct personal information.

MIHE will take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. MIHE relies on individuals to provide accurate and current information in the first instance, and to notify MIHE when circumstances or details change. Personal information may be stored in hard copy documents, as electronic data, or in MIHE software, databases or systems. MIHE protects personal information via various means including, but not limited to:

- Controlling physical access to MIHE premises and hard copy documents and
- Controlling electronic access to MIHE's website, software, databases or systems with security measures such as password protection and security monitoring.

### **Information access**

Staff who needs the personal information to carry out their responsibilities will be able to gain access

to that information. MIHE will also provide individuals with the right to access or obtain a copy of the personal information that MIHE holds about them at no charge. However, there may be a fee to make a copy of this information. Requests to access or obtain a copy of their personal information must be made in writing. Once a written request to obtain a copy of their personal information is received by MIHE, the requesting individual will be advised how this will occur and if any applicable fees apply, within 10 working days of receiving the written request. Access to the personal information will be provided in a manner requested by the individual if it is reasonable to do so.

Written requests for access to, or to obtain a copy of, or correct personal information held by the MIHE should be sent to: [info@mihe.com.au](mailto:info@mihe.com.au).

Certain types of sensitive personal information may be subject to confidentiality standards beyond this Policy. In certain cases, the confidentiality requirements in this Policy will be overridden by legal or legislative obligations of disclosure.

### **Questions or complaints about Privacy at MIHE**

MIHE takes all complaints seriously, including privacy-related complaints. MIHE is committed to investigating and resolving privacy complaints in a timely, open, fair and transparent manner.

To raise any concerns or complaints in relation to privacy at MIHE, please email [privacy@mihe.com.au](mailto:privacy@mihe.com.au).