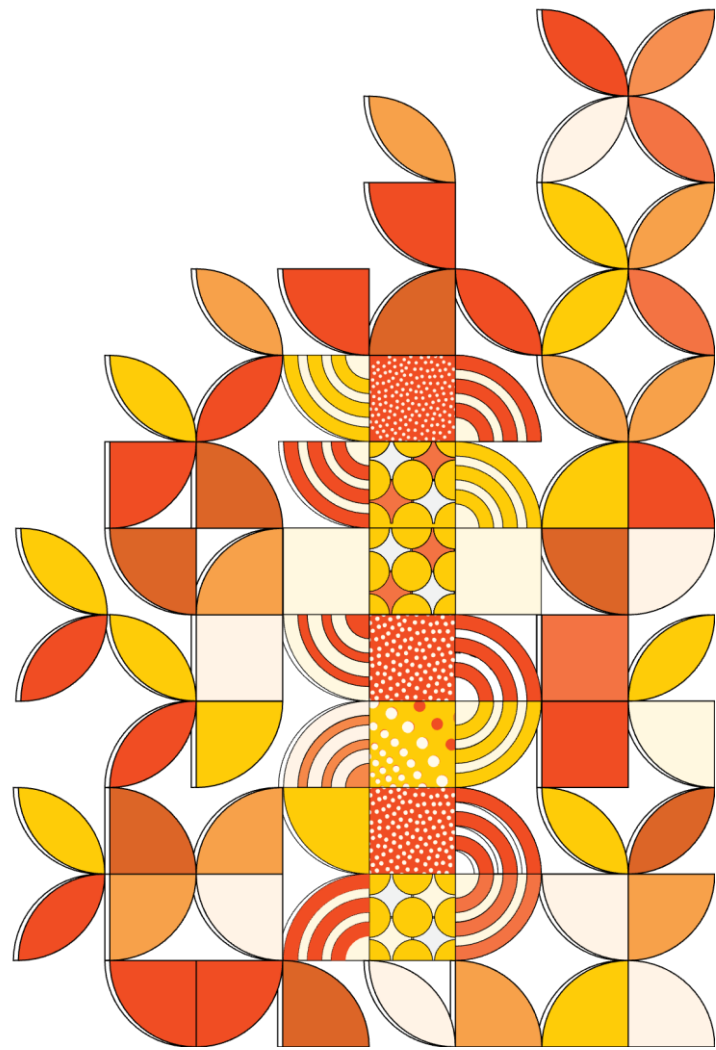


# Privacy Procedure



## SECTION 1

### Purpose

1. The purpose this procedure is to outline how IHM complies with the [Privacy Act 1988](#) and the [Australian Privacy Principles \(APPs\) 2014](#) and other federal laws on how IHM collects, stores, uses and disseminates student and staff personal information.

### Scope

2. IHM adheres to the Australian [Privacy Principles \(APPs\) 2014](#) outlined in the [Privacy Act 1988](#), the Information Privacy Principles (IPPs) in the [Privacy and Data Protection Act 2014 \(Vic\)](#), the the [Health Privacy Principles \(HPPs\)](#) in the [Health Records Act 2001](#), and other related legal obligations.
3. This Procedure governs IHM's handling of personally identifiable information collected through various means during the student life cycle. It does not apply to the practices of companies that IHM does not own or control, nor to individuals who are not employed or managed by IHM.
4. The IHM Privacy Procedure is technology-neutral, applying equally to both paper-based and digital environments, ensuring its relevance and applicability in the context of continually evolving and emerging technologies.
5. This procedure covers all personal and sensitive information relating to students and staff and all institutional records including educational, training, assessment, policy, financial, Intellectual Property, compliance, and quality documents.

### Definitions

6. Definitions for key terms are presented in the [Glossary of Terms](#).

### Suite documents

7. This Policy is linked to the following:
  - a) Privacy Policy
  - b) See also Associated Information listed in the 'Related Internal Documents' in Section 3 below.

## SECTION 2

### Procedure

#### 8. Collection and Verification of Information

- 8.1 IHM collects students' personal information through the enrolment application form which. This information is verified during the orientation process as well as during the student's course of study.

- 8.2 All students sign a declaration form confirming that they understand and agree to the use of their personal information and appropriate disclosure.
- 8.3 IHM maintains a commitment to ensuring the accuracy and currency of individual student personal information. To uphold this standard, IHM will require students to submit their most recent personal information at the beginning of their course and the details are checked against their official identification (e.g. passport, National ID).
- 8.4 IHM must ensure that a request for personal information under [Chapter 12: APP 12 Access to personal information](#) is made by the individual concerned or by an authorised representative, such as a legal guardian or an authorised agent.
- 8.5 It is impracticable for IHM to process an anonymous request for personal information.
- 8.6 The steps required to verify an individual's identity will vary depending on the circumstances, including whether the individual is already known to or easily identifiable by IHM. The minimum amount of personal information necessary to confirm an individual's identity will be requested. Where feasible, the information may be verified by sight rather than copied or collected for inclusion in a record. For example, during a face-to-face interaction, IHM may choose to note that an identity document was seen without making a copy of the document.
- 8.7 IHM may also provide access through a mutually agreed intermediary, in accordance with [Chapter 12: APP 12 Access to personal information](#), when direct access would otherwise be denied. For instance, if access to health information is required, the intermediary might need to be a qualified health service provider.

## 9. Release of Information about Students of IHM

- 9.1 IHM does not release personal information about any student without the student's written consent. Information on a student's file is only accessible to IHM staff whose official responsibilities involve them in student and student-related matters.
- 9.2 Releasing confidential information (including units attempted, units passed, grades, address, and phone number) to anyone other than the student or authorised Institute personnel, or as part of legal reporting requirements to relevant and authorised authorities is strictly prohibited.
- 9.3 If a student wishes to have information released concerning their enrolment at IHM, they must:
  - a) complete and submit the 'Student Records Access Request form'. The form will be retained in the student's file.
  - b) If the student is requesting information through email, it should be from a verified email registered in the IHM student management system.

- c) Student should submit the completed form to Registrar for consideration.
- d) The filled form can be either emailed to Registrar (contact details available on IHM Website) or a paper copy can be submitted to any of the campus locations addressed to Registrar.
- e) Once the application is received, Registrar will acknowledge the receipt of the request within Five working days.
- f) In every possible case, a decision on the requested personal information is made within 30 days or will advise the student why the decision cannot be made within 30 days, the reasons for the delay and when the individual can expect the decision to be made.
- g) IHM has the right to withhold a request if there is any financial debt to IHM or any disciplinary action pending about the student.
- h) IHM may accept telephone messages on behalf of a student, acknowledging the student's enrolment; however, no personal details will be disclosed to the caller.

## **10. Release of Information of staff employed by IHM**

10.1 Personal and confidential information about individual staff members will not be released, without the staff members' consent or request, to persons within or outside IHM, except in circumstances required by law (e.g., income tax certificate).

10.2 Information about staff members employed by the Institute is regarded as confidential. However, some staff members may be listed publicly in publications such as handbooks. The Institute must also comply with external authorities by submitting general statistical data about its operations, which does not include personal identification of individuals.

10.3 In specific circumstances concerning staff employment, IHM may disclose information to other organisations. For instance, if an IHM staff member resigns to join another organisation, it may be necessary to provide details such as the staff member's study and long service leave credits and superannuation agreements. In these cases, IHM will assume the staff member's consent unless otherwise notified. At the written request of a staff member, the Institute may release personal information to another organisation stating, for example, that the person is a staff member of the Institute, the position they occupy and the remuneration they receive.

## 11. Sharing information with Third Parties

- 7.1 Unless instructed otherwise, personal information may be shared within IHM's related companies, where it will remain confidential. IHM does not collect or compile personally identifiable information for distribution or sale to external parties for marketing purposes. Information will only be disclosed when necessary for operational purposes or as required by law:
- Required by the regulators
  - Required by the law
  - The individual has consented to disclose the information
  - It is needed to share to provide the product or service that was requested
  - In some cases, IHM may engage external contractors to perform specialised tasks on its behalf, such as mailing IHM information or sending high-volume Internet communications, including emails and SMS messages
- 7.2 External contractors engaged by IHM act solely on its behalf and do not operate independently with personal information. Personal information may be shared with contractors as needed to complete their contracted tasks. All information remains the property of IHM, and contractors are bound by specific confidentiality and non-disclosure agreements.
- 7.3 When personal information is disclosed for the enforcement of criminal law, the imposition of pecuniary penalties, or the protection of public revenue, the record-keeper must make a note of the disclosure in the relevant record. This note will be added to the staff or student file.
- 7.4 A person, body, or agency receiving personal information is prohibited from using or disclosing the information for any purpose other than the one for which it was originally provided.
- 7.5 IHM will not disclose personal information to any entity outside of Australia unless express written consent has been provided.
- 7.6 Students who consent to IHM using their personal information, such as name and images, for marketing purposes on social media platforms are advised that their information may be accessed by individuals outside of Australia.
- 7.7 IHM may be required to collect government-related identifiers in certain circumstances (e.g., concession numbers, USI, driver's license numbers). These identifiers will be used solely for the specific purpose for which they are collected and will not be used as general identifiers of individuals.

7.8 IHM will only disclose government-related identifiers where required by law or express consent has been given to disclose this information.

## 12. Storage and Security of Data

12.1 IHM will ensure that all data and records are protected by robust security measures appropriate to the circumstances to prevent loss, unauthorised access, use, modification, or disclosure.

12.2 This protection will adhere to IHM's Cyber Safety and Cyber Security Policy and Procedure, as well as the Records Management Policy and Procedure.

## 13. Collection of Personal Information for online payment

13.1 When registering for or paying for a course through the online application portal on the IHM website ([www.ihm.edu.au](http://www.ihm.edu.au)), payments are processed through our payment partners.

13.2 Payments are securely redirected to [payment partners](#) such as Payway, Airwallex, SecurePay, Convera, Xplorar (PaySmart), and Flywire.

## 14. Correction of Data available with IHM

14.1 In accordance with [Chapter 13: APP 13 Correction of personal information](#), IHM will take reasonable steps to ensure that the personal information it holds is accurate, up-to-date, complete, relevant, and not misleading, considering the purpose for which the information is held.

14.2 The requirement to take reasonable steps applies in two circumstances:

- a) Where IHM is satisfied, independently of any request, that personal information it holds is faulty; or
- b) Where an individual requests IHM to correct their personal information.

14.3 IHM will follow minimum procedural requirements about correcting personal information by:

- a) Providing a written notice to an individual when a correction request is refused, including the reasons for the refusal and the complaint mechanisms available to the individual.
- b) Responding promptly to an individual's request to correct personal information or to associate a statement with the information; and

- c) Not charging an individual for requesting to correct personal information or associate a statement, or for making a correction or associating a statement.

## 15. Resolving Concerns on Privacy Issues

15.1 If an individual wish to raise or discuss any privacy issues outlined in the Privacy Policy and Procedure, individuals can:

- a) Speak directly to People and Culture Officer who will endeavour to resolve the issue.
- b) Call the Feedback Line on 1800 22 52 83 during business hours.
- c) Email the issue to [hr@hcgigroup.com.au](mailto:hr@hcgigroup.com.au)
- d) If an investigation is necessary, IHM will keep the individual informed of the progress. If the matter cannot be resolved by staff, it will be escalated as needed to facilitate a solution.
- e) For complaints and appeals, students are advised to refer to Student Complaints and Appeals Policy and associated procedures, while staff should refer to the Staff Grievances and Complaints Policy and Procedure.

## SECTION 3

### Associated Information

<b>Related Internal Documents</b>	Privacy Policy Records Management Policy Records Management Procedure
<b>Related Legislation, Standards, and Codes</b>	<a href="#">Tertiary Education and Quality Standards Agency Act 2011</a> <a href="#">Higher Education Standards Framework (Threshold Standards) 2021</a> <a href="#">Health Records Act 2001</a> <a href="#">Privacy and Data Protection Act 2014 (Vic)</a> <a href="#">Higher Education Provider Guidelines (2023)</a> <a href="#">Higher Education Support Act (2003)</a>
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## Change History

<b>Version Control</b>		
<b>Change Summary</b>	<b>Date</b>	<b>Short description of change, incl version number, changes, who considered, approved etc</b>
Version 2.0	7/01/2021	<ul style="list-style-type: none"> <li>• Added version number</li> <li>• Minor editorial changes</li> <li>• Amended by the Learning and Teaching Committee at its meeting in December 2020 and feedback incorporated by the Director, Quality Assurance</li> <li>• Version 2 approved by Academic Board in February 2021</li> </ul>
Version 3.0	6/10/2022	<ul style="list-style-type: none"> <li>• Comments from FEE-HELP application response included</li> </ul>
Version 4.0	02/08/2024	<ul style="list-style-type: none"> <li>• The definitions relocated to IHM glossary of terms.</li> <li>• Template updated</li> <li>• Changes to align policy and procedure with Higher Education Support Act (2003) and Higher Education Provider Guidelines (2023)</li> </ul>