



PRIVACY AND PERSONAL INFORMATION POLICY AND PROCEDURE

1. Overview

In the course of its business, Skyline Higher Education Australia (“SHEA”) may collect information from individuals, including students or persons seeking to enrol with SHEA, either electronically or in hard copy format, including information that personally identifies individual users. SHEA may also record various communications between individuals and SHEA.

When collecting, handling and storing personal information SHEA will comply with the requirements of the Australian Privacy Principles (APPs) set out in the *Privacy Act 1988 (Cth)* as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

2. Collection and use of personal information

SHEA will only collect personal information from individuals by fair and lawful means which is necessary for the functions of SHEA. SHEA will only collect sensitive information with the consent of the individual and if that information is reasonably necessary for the functions of SHEA.

The information requested from individuals by SHEA will only be used to provide details of study opportunities, to enable efficient course administration, to maintain proper academic records, to provide access to Commonwealth funding (if applicable), ensure your fees are protected and, if required to report to government agencies as required by law as described in Section 3 of this document. If an individual chooses not to give SHEA certain information then SHEA may be unable to enrol that person in a course or supply them with appropriate information.

The types of personal information collected by SHEA includes personal details such as an individual’s name, date of birth, gender, ethnicity, citizenship, language, disability, contact details (including emergency contact), prior education, and details of the educational achievements of parents or guardians. SHEA will also record details of an individual’s study with SHEA, including subject and course enrolments and outcomes, payment information, Commonwealth funding and any correspondence a student may have with SHEA.

3. Disclosure of personal information

Personal information about students studying with SHEA may be shared with the Australian Government and designated authorities, including the Tertiary Education Quality and Standards Agency (TEQSA), the Commonwealth Department with responsibility for administering the *Higher Education Support Act 2003*, or a Tuition Assurance/Protection Scheme manager (who in turn may disclose personal information to a replacement higher education provider or the Australian Government Actuary). This information includes personal and contact details, course enrolment details and changes, and in the case of international students the circumstance of any suspected breach of a student visa condition.

SHEA will not knowingly share any personal information with any third party other than any service providers who assist SHEA in providing the information and/or services SHEA provides. SHEA does not and will not sell or deal in personal information. SHEA may use information gathered in a general sense without any reference to an individual’s name to create marketing statistics, identify user demands and to assist it in meeting client needs generally. In addition, SHEA may use the information that individuals provide to improve its website and online services but not for any other use.

SHEA will not disclose an individual's personal information to another person or organisation unless:

- a) the individual concerned is reasonably likely to have been aware, or made aware, that information of that kind is usually passed to that person or organisation;
- b) the individual concerned has given written consent to the disclosure;
- c) SHEA believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or of another person;
- d) the disclosure is required or authorised by or under law; or
- e) the disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue.

Where personal information is disclosed for the purposes of enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the purpose of the protection of the public revenue, SHEA shall include in the record containing that information a note of the disclosure.

SHEA will only disclose information to an overseas recipient if that disclosure relates to an individual's course containing an overseas component (study or practicum). SHEA will take all reasonable steps to ensure that any overseas recipient complies with the APPs. Overseas agents may collect information on behalf of SHEA where an individual from a foreign country seeks to study in Australia.

Any person or organisation that collects information on behalf of SHEA or to whom personal information is disclosed as described in this procedure will be required to not use or disclose the information for a purpose other than the purpose for which the information was collected by them or supplied to them.

4. Security and integrity of personal information

SHEA is committed to ensuring the confidentiality, security and integrity of the personal information it collects, uses and discloses.

SHEA will take all reasonable steps to ensure that any personal information collected either electronically or in hard copy is relevant to the purpose for which it was collected, is accurate, up to date and complete.

SHEA will store securely all records containing personal information and take all reasonable security measures to protect personal information it holds from misuse, interference, loss, unauthorised access, modification or disclosure.

Where SHEA has no further use for personal information for any purpose disclosed by SHEA, or is no longer required to maintain that personal information, all reasonable steps will be taken to destroy or de-identify the information.

5. Right to access and correct records

Individuals have the right to access or obtain a copy of the personal information that SHEA holds about them. Requests to access or obtain a copy of personal information must be made in writing. There is no charge for an individual to access personal information that SHEA holds about them; however SHEA may charge a fee to make a copy. Individuals will be

advised of how they may access or obtain a copy of their personal information and any applicable fees within 10 days of receiving their written request. Where it is reasonable to do so, access to the information will be provided in the manner requested by the individual.

If an individual considers their personal information to be incorrect, incomplete, out of date or misleading, they can request that the information be amended. Where a record is found to be inaccurate, a correction will be made as soon as practical. Where an individual requests that a record be amended because it is inaccurate but the record is found to be accurate, the details of the request for amendment will be noted on the record. There is no charge for making a request to correct personal information.

Written requests for access to, to obtain a copy of, or correct personal information held by SHEA should be sent to:

Registrar
registrar@shea.edu.au

6. Complaints about an alleged breach of the APPs

Where an individual believes that SHEA has breached a Privacy Principle in relation to that individual, they may lodge a complaint using SHEA's grievance handling procedures which enables students and prospective students to lodge grievances of a non-academic nature, including grievances about handling of personal information and access to personal records.

7. Publication

These *Privacy and Personal Information Procedures* will be made available to individuals, including students and persons seeking to enrol with SHEA, by publication on SHEA's website (www.shea.edu.au). Alternatively, a copy of this policy may be requested by contacting the Registrar using the contact details provided above.

In order to ensure that students have given their informed consent for their personal information to be disclosed to certain third parties as outlined in this procedure, SHEA will advise students on enrolment about these procedures and where they are located.

8. Version history

Version	Approved by	Approval Date	Details
1.0	Executive Management Committee	31 August 2022	Document creation and initial approval
1.1	CEO	28 October 2024	Update to section 2 to clarify types of personal information collected

Document owner: CEO