

Policy Name:	<b>Privacy</b>
Document Number:	GM 4.1.01
Approved by:	CEO
Last Approval Date:	April 2022
Review Date:	April 2024
Audience:	Charlton Brown Staff, Students and Community
Contact Officer:	Director Compliance and Training Management
Related Documents:	Privacy Management; Privacy Management Procedure ; Student Privacy Information Sheet ; Right to Information and Privacy ; Code of Conduct Policy; Conditions of Employment ; Confidential College Information ; Intellectual Property ; Confidentiality of Employee Information ; Induction.
Legislation:	<a href="#">Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Clth);</a> <a href="#">Privacy Regulations 2013 (Clth);</a> <a href="#">Qld Information Privacy Act 2009;</a> <a href="#">VSL Loan Act 2016;</a> <a href="#">VSL Student Loan Rules 2016</a>

**1. Purpose and Objective**

The Privacy Policy implemented by Charlton Brown extends to and covers all operations and function of the organisation. The objective of the Privacy Policy is to ensure that a sound privacy foundation and framework is established and maintained by Charlton Brown and the College complies with the relevant Privacy legislation – Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Clth), Privacy Regulations 2013 (Clth), Qld Information Privacy Act 2009 and others. Further Privacy training is covered in Charlton Brown Induction Training Program that all employees complete as part of induction.

**2. Policy Scope/Coverage**

All management, employees, students, prospective students, contractors, sub-contractors, vendors, service providers, customers, agents or any other third parties that have access to and/or utilise personal information collected and/or held by Charlton Brown must abide by this Privacy Policy.

**3. Definitions**

No definitions for this Policy

**4. POLICY**

**4.1 Ownership of Personal Information**

All personal information collected, held or shared by Charlton Brown must be done so in accordance with this Privacy Policy. Charlton Brown retains the right to take reasonable steps to ensure that its Privacy Policy is properly adhered to.

In every business unit or function of Charlton Brown where personal information is collected, the person to whom the information is given, or the application is addressed is responsible for ensuring compliance with this Privacy Policy.

It is the responsibility of all employees and other relevant parties to ensure that they understand and adhere to the Privacy Policy implemented by Charlton Brown and that they maintain up-to-date knowledge of changes or any new privacy policies and procedures.

Ignorance of the existence of any privacy policies and procedures will not be an acceptable excuse for non-compliance.

#### 4.2 Contractual Arrangements

Charlton Brown will ensure that all contractual arrangements with third parties adequately address privacy issues.

#### 4.3 Availability of Privacy Policy

Charlton Brown will ensure that a copy of the Privacy Policy is available to all job applicants and students and prospective students and customers if requested.

#### 4.4 Collection of Information

Collection of personal information, Charlton Brown will be reasonable, lawful and not intrusive. A person from whom personal information is requested must be told:

- the College's name (if external to the College)
- the purpose of collection
- that they can get access to their personal information in order to check its accuracy; and
- what will be done with the information.

#### 4.5 Use and Disclosure

Charlton Brown will only use or disclose information for the purpose for which it was collected unless the person has consented, or the secondary purpose is related to the primary purpose and a person would reasonably expect such use or disclosure, or the use is for direct marketing in specified circumstances and with the permission of the person, or in circumstances related to regulatory requirements, public interest such as law enforcement and public or individual health and safety.

#### 4.6 Data Security

Charlton Brown will take all reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure.

#### 4.7 Access to Personal Information

Any person who has provided personal information to Charlton Brown for whatever reason may gain access to that information by contacting the Compliance Officer.

Current Charlton Brown students have access to view their personal details through the aXcelerate Learning Management Portal.

If any inaccuracies are identified in personal information this can be rectified by emailing student services at [studentservices@charltonbrown.com.au](mailto:studentservices@charltonbrown.com.au); evidence may be requested to validate change request.

**4.8 Complaints Procedure**

Any complaints or requests for information regarding privacy must be handled in accordance with the following procedure:

- **Contact the Privacy Officer** – Compliance Manager– The incumbent of the position will handle any complaints and explain the procedure involved.
- **Confidentiality** – Any complaint will be dealt with in the strictest of confidence.
- **Outside Assistance** – Whilst the College will make every effort to resolve any complaint within the organisation, any person who feels their privacy has been breached has the right to take the complaint to the Privacy Commission.

Version History				
Review Period:		3 years from date of last approval		
Version Number:	Approved by:	Approval Date:	Effective Date:	Sections Modified:
D1				New Policy developed
1.0		April 2022	April 2022	Approval of new policy