



PRIVACY POLICY

Governing authority	Board of Directors (in consultation with the Academic Board)
Responsible officer	Business Manager
Date of endorsement (Academic Board)	5 June 2019
Date of approval (Board of Directors)	11 June 2019
Date of effect	11 June 2019
Review timeframe	Annual
Review date	May 2020

1. Purpose

The *Privacy Policy* describes how to collect, use, disclose and handle information responsibly and lawfully. It requires that the Australian Chiropractic College's (ACC's) information management processes comply with the [Privacy and the Data Protection Act 2014 \(Vic\)](#), the [Health Records Act 2001 \(Vic\)](#), and the [Privacy Act 1988 \(Cth\)](#).

2. Scope

The policy applies to ACC staff and students (prospective, current and former), and other individuals associated with the College such as external providers, practicum hosts and contractors who handle personal, sensitive, health and confidential information related to ACC's students, staff and/or operations.

3. Policy

The ACC encourages all College staff to take a proactive approach to privacy by upholding the Information Privacy Principles (IPPs), the Health Privacy Principles (HPPs), and the Australian Privacy Principles (APPs).

ACC staff are open and transparent about the type of personal or sensitive information they collect from individuals and how that information is used.

Reasonable measures are implemented to ensure that information is protected from misuse, unauthorised access, loss and unlawful disclosure.

Individuals may request access to their information. Complaints regarding access to information or breaches of privacy are managed under ACC's *Grievance Management* policies.

4. Collection

The ACC only collects information that is required to fulfil its business functions and educational activities. Sensitive information is collected when legally required or permitted, and according to the following processes.

When collecting information from individuals, ACC staff will advise them of the following:

- why ACC is collecting the information
- how the individual can access their information
- to whom the information will be disclosed
- whether the collection is required by law, and
- the consequences of not providing the information

The ACC issues privacy statements so that individuals receive further guidance in writing.

Once collected, information is maintained to ensure that it remains accurate, complete and current.

5. Use and disclosure

ACC staff will use and disclose an individual's information for the primary purpose for which it was collected.

Staff are only permitted to use and disclose information for a secondary purpose if one or more of the following applies:

- the individual consents
- the law requires and permits it
- the secondary purpose is directly related to the primary purpose
- the individual would reasonably expect the ACC to use or disclose the information for that secondary purpose

6. Access

Different staff oversee the management of different records:

- Registrar oversees student records, including records of all grievances
- HR Manager is responsible for employee records
- Business Manager oversees health records that are created by ACC's counsellors and disability support officers

Staff and students may request access to their confidential records. Requests for copies are made via email to the relevant staff member(s). ACC will issue a copy of the information in confidence within 20 working days of receiving the request.

Parties to a complaint will have appropriate access to grievance records for five (5) years.

7. Storage

The ACC stores personal and sensitive information securely and in line with the *Information Security Classification Schedule (Schedule 1)*.

ACC staff are only permitted to store personal and sensitive information on approved ACC applications and software. They do not retain personal credit card details in any format.

Personal or sensitive information that is stored on a portable storage device (PSD) is password protected. Device owners must take all reasonable steps to keep secure the PSD and the information it stores.

8. Disposal

The ACC will destroy or permanently de-identify in accordance with governing legislation any personal, sensitive and health information that it is no longer legally required to hold.

ACC staff are not permitted to destroy information needed to process a current Freedom of Information request or information that is likely to be required in grievance processes or legal proceedings.

9. Related policies / documents

- *Privacy Procedure*
- *Privacy Statements for students and staff*
- *Grievance Management – Students*
- *Grievance Management – Staff*

10. Version control

Date	Description of amendment