

1. Policy Statement and Purpose

ICHM is bound by the Australian Privacy Principles contained in the [Commonwealth Privacy Act 1988](#). This Privacy policy has been updated to also comply with the EU [General Data Protection Regulation](#) (GDPR).

This policy outlines how ICHM uses and manages personal information provided to, submitted to or collected by it. This includes personal information which is provided to ICHM via the ICHM website or official social media channels.

ICHM may from time to time, review and update this Privacy policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing college environment.

Accessing the ICHM website or official social media channels and/or providing personal information to ICHM confirms acceptance of, and consenting to, this Privacy policy.

In implementing this policy, ICHM staff will remain supportive and sensitive to the needs and traditional cultural practices of Aboriginal and Torres Strait Islander peoples. For more information, please refer to the *Diversity, Equity and Inclusion Policy*.

2. Policy Details

2.1 Collection of personal information

ICHM collects personal information, including sensitive information about:

- students and parents and/or guardians
- potential students
- former students, graduates and alumni
- staff members, job applicants, volunteers and contractors
- potential employers and industry partners
- agents, school professionals and other people who come in contact with ICHM.

Personal information you provide:

ICHM will generally collect personal information held about an individual by way of forms filled out by parents or students, face to face meetings, interviews, telephone calls, online submission, interaction via official ICHM social media platforms or email enquiries. On occasions, people other than parents and students provide personal information in relation to students and potential students.

Personal information in relation to staff members, former staff members, potential staff members, volunteers and contractors is collected via applications for employment, during interviews, via a range of correspondence, including electronic, and ongoing face to face meetings.

Personal information provided by other people:

In some circumstances, ICHM may be provided with personal information about an individual from a third party, for example a report provided by a medical professional, an agent, another school or industry newsletters and trade journals.

Exception in relation to employee records: Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy policy does not apply to ICHM's treatment of an employee record, where the record is directly related to a current or former employee of ICHM.

2.2 Use of personal information

ICHM will use personal information it collects for the primary purpose of communicating with potential students, students and graduates, maintaining student and employee records and providing higher education courses, and for such other secondary purposes that are related to the primary purpose and are reasonably expected or for which consent has been granted.

Information on students and parents:

The purposes for which ICHM uses personal information of students and parents include:

- to keep students informed about matters related to them, through correspondence, newsletters and magazines
- day to day administration of the College
- looking after student educational, social and medical wellbeing
- arranging and managing a student industry placement
- marketing for the College
- satisfying our various legal obligations (including the preservation of academic records) and allowing ICHM to discharge its duty of care.

ICHM may not be able to enrol or continue the enrolment of a student if necessary information about the student or parent is not provided.

Information on job applicants, staff members, volunteers and contractors:

In relation to personal information of job applicants, staff and contractors, ICHM's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, to maintain adequate personnel and professional development records and to comply with statutory requirements.

The purposes for which ICHM uses personal information of job applicants, staff members and contractors include:

- administering the individual's employment or contract
- satisfying insurance requirements
- marketing for the college
- satisfying ICHM's legal obligations.

ICHM destroys personal information provided by job applicants 6 months after consideration of the application is completed.

Information on agents, employers and education professionals:

ICHM maintains records of employers who accept students as part of the cooperative industry placement education process and vocational education professionals who partner with ICHM to provide to school students, quality advice and material to support career choice. Printed material of interest to prospective students and other promotional material distributed to education professionals and to industry partners ensure that ICHM continues to be a quality learning environment engaged with industry.

ICHM publications, such as newsletters and magazines, which include personal information and sometimes visual images, may be used for marketing purposes.

2.3 Disclosure of personal information

With consent, ICHM may disclose personal information, including sensitive information held about an individual to:

- another school or university
- government departments
- medical practitioners
- people providing services to ICHM, including educational specialists, related group entities and visiting lecturers
- recipients of ICHM publications, such as newsletters and magazines
- newspapers and trade journals
- parent associations/committees
- potential employers, including for industry placement
- other parents or guardians or
- anyone you authorise ICHM to disclose information to

ICHM will not sell or rent any personal information, including sensitive information.

Information about your enrolment will be disclosed to the Department of Education, Skills and Employment for the purposes of administering tuition protection.

We may disclose your personal information to Australian Government agencies, including Services Australia, where this is required or authorised by Australian law.

Information about your enrolment with us may be disclosed if you are claiming or receiving a payment from Services Australia.

You are still required to notify Services Australia of any change in circumstances that may affect your payment.

Personal information disclosed to Services Australia is protected by law, including the [Privacy Act 1988](#).

More information about the way Services Australia handles personal information can be found on their [privacy webpage](#).

Sending information overseas:

ICHM will not send personal information about an individual outside Australia without:

- obtaining consent of the individual (in some cases, consent will be implied) or
- otherwise complying with the Australian Privacy Principles

2.4 Sensitive Information

In referring to 'sensitive information' ICHM means information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences, criminal record and health information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the person agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

2.5 Updating Information

ICHM endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by ICHM at any time.

2.6 Consent

ICHM seeks consent for the release of personal information, in specified circumstances, in the ICHM Application Form.

ICHM will refer any further requests for consent and notices in relation to the personal information of a student to the student alone, unless consent has been provided by the student in writing. ICHM will discuss general information with parents who have signed the application form for entry to ICHM as sponsor/guardian. However sensitive information will not be released without specific approval.

An individual has the right to revoke consent at any time.

2.7 Your rights

An individual has the following rights:

- Right of access and verification

Under the Commonwealth Privacy Act, an individual has the right to request access to any personal information which ICHM holds about them and to advise ICHM of any perceived inaccuracy.

There are some circumstances where access may be denied. Such circumstances would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in the breach of ICHM's duty of care to the student.

Students will have access to their own personal information, unless they are less than 18 years of age, in which case their parents will have independent access. Students may authorise their parents to have access to their own details.

Requests to access or amend any information ICHM holds about you, or your child, should be forwarded in writing to the Head of ICHM. ICHM may require you to verify your identity and specify what information you wish to view.

- Right to ask for your personal data to be de-identified or deleted

ICHM is bound by legislative requirements to retain personal data in relation to students, graduates, staff and ex-staff.

ICHM will remove individuals from general and marketing correspondence on request. This includes unsubscribing from electronic publications and e-messaging.

- Right to secure storage of your data

ICHM's staff are required to respect the confidentiality of students', parents' and guardians' personal information and the privacy of individuals.

ICHM has in place steps to protect the personal information ICHM holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and appropriate electronic data security hardware and applications and, where appropriate, password protected access rights to computerised records.

Personal information and data collected electronically or via the ICHM website or official ICHM social media platforms is transferred to ICHM and managed by ICHM securely.

- Right to revoke consent

An individual has the right to revoke consent for personal data to be provided to a third party where ICHM is not bound by a legal requirement to provide such data.

2.8 Contact Details

Requests to access or amend information held by ICHM should be directed to:

The Head of ICHM
ICHM
133-139 Currie St
Adelaide SA 5000

Phone: +61 (08) 8228 3664

3. Responsibilities and Authorities

The Head of ICHM is responsible for the review of this policy on a 3 yearly basis. The Head of ICHM must approve any change to this Privacy policy and procedure.

4. Supporting Documents

[Commonwealth Privacy Act 1988](#)

EU [General Data Protection Regulation](#) (GDPR)

5. Approval

Accountability and review			
Delegate	Head of ICHM	Ref: ICHM Delegations Register	
Approval body	Head of ICHM		
Approval date	20230525		
Review date	3 years from last review 20260525		
Supporting information			
Related legislation	Higher Education Standards Framework (Threshold Standards) 2021 (Cwlth) Commonwealth Privacy Act 1988		
Sector benchmarking			
Supporting documents			
Related documents	<i>Diversity, Equity and Inclusion Policy</i>		
Superseded documents			
Type and location			
Policy type <select row and shade>	<input type="checkbox"/> Corporate Governance <input type="checkbox"/> Academic Governance <input type="checkbox"/> Academic Management <input checked="" type="checkbox"/> Operational Management		
Location/access <select row and shade>	<input type="checkbox"/> Website <input checked="" type="checkbox"/> Student access <input type="checkbox"/> Staff access <input type="checkbox"/> Overseas		
Amendments			
Version No.	Amendment type	Amendment Date	Key changes
1.0	New Doc	17/01/12	Modification of existing policy
2.0	Major	6/11/2012	Addition of the Changes to the Policy section
2.1	Minor	4/9/2013	Change title of Principles
3.0	Major	30/7/2018	Review to clarify application to website and official social media engagement and refine other matters in the policy. Note alignment with the EU General Data Protection Regulation (GDPR)
4.0	Major	05/12/19	Information added in relation to the needs of Aboriginal and Torres Strait Islander peoples and their traditional cultural practices
5.0	Major	19/05/2021	Privacy information updated due to Department of Education recommendation re: student data reporting; position title change
5.1	Minor	31/03/2022	Minor amendments, template update, title changes
5.2	Minor	25/05/2023	Changes to job titles, contact details and formatting.