Privacy Policy

Supporting plans, policies and procedures	• Admissions and Enrolment Policy and Procedure • Records, Data and Information Management and Security Policy • Conferral of Awards and Graduation and Academic Documentation Policy • Academic Integrity and Academic Misconduct Policy and Procedure • Academic Progress and Student At-Risk Policy and Procedure • Bullying, Harassment, Discrimination, Sexual Assault and Sexual Misconduct Policy and Procedure • Code of Conduct • Marketing and Student Recruitment Policy • Non-Academic Misconduct Policy and Procedure • Recruitment and Selection Policy and Procedure • Staff Complaints and Appeals Policy and Procedure • Student Complaints and Appeals Policy and Procedure, Records • Records, Data and Information Management and Security Policy
Related Legislation and documents	• Health Records Act Vic) 2001 • Higher Education Standards Framework (Threshold Standards) 2021 • Higher Education Data Protocols (https://www.education.gov.au/higher-education-statistics/resources/higher-education-data-protocols) • Higher Education Administrative Information for Providers (https://www.education.gov.au/higher-education-publications/higher-education-administrative-information-providers) • Privacy Act 1988 • Tertiary Education Quality and Standards Agency (TEQSA) Act 2011 •
Version	2.1
Date approved	23 May, 2024
Approved by	Board of Directors
Approval reference	BoD M033
Document Review	This document is to be reviewed at least every three years

Version	Review Date and Person/Body	Notes
0.1	Draft prepared by CEO and reviewed at 7 January 2020 Board of Directors meeting	
1.0	Approved at the 7 January 2020 Board of Directors meeting	
1.1	Approved at the 28 October 2020 Board of Directors meeting	Minor updates included after further internal and external review
2.0	Reviewed and approved by the Board of Directors via email circulation on 23 July 2021	Updates made following the response to the TEQSA Request for Information 23 July 2021
2.1	Approved by the Board of Directors on 23 May, 2024	Minor revisions following periodic review

Background and Scope

In delivering higher education courses, MIHE may collect information from students or prospective students, either electronically or in hard copy format, including personal information that identifies individuals. MIHE may also record various communications between individuals and MIHE. This policy supports MIHE's commitment to protection of personal information. This policy defines how MIHE respects the privacy of information it collects, stores, uses and provides access to information. It ensures that MIHE will satisfy its legal responsibilities in privacy protection as they apply to students and other stakeholders including board members, committee members, staff, and contractors.

Definitions

Personal information: Recorded information or data about an identifiable or easily identifiable individual.

Sensitive information: Personal information about an individual's race or ethnicity, political opinions, religious or philosophical beliefs, sexual orientation or practices, criminal record, or memberships details, such as trade union or professional, political or trade associations, genetic data and biometric data.

Health information: Information about an individual's physical, mental or psychological health

Refer to Glossary of Terms.

Policy

MIHE's students, board members, committee members, staff, and contractors are entitled to have their privacy protected. MIHE recognises its obligation regarding the collection, storage and use of personal information and will take all necessary measures to ensure privacy is protected.

This policy has been developed in alignment with the Australian Privacy Principles (APP) guidelines provided by the provided by the Office of the Australian Information Commissioner (https://www.oaic.gov.au/privacy/australian-privacy-principles-guidelines/). All staff members will be made aware of the privacy obligations during induction and receive updates, reminders and training as required.

All personal information is collected for the operations of MIHE. Personal information is collected directly from the individual, although in some cases, a third party, such as a family member, may provide information on the individual's behalf. All studentsand other MIHE stakeholders have the right to access their personal information held by MIHE.

Open and transparent management of personal information

MIHE will manage personal information in an open and transparent way. This includes having a clearly expressed and up to date *Privacy Policy* (this document) that is easily accessible, including through the MIHE website.

Collection, Use or Disclosure of Personal Information

MIHE will collect, use, or disclose personal information where it is lawful and necessary or is directly related to furthering its educational, administration and research purposes. MIHE will typically collect and use information for handling enquiries, admissions, enrolments and administration, providing student services, conducting student assessments, conducting marketing campaigns, budgeting and forecasting, maintaining information technology facilities and transacting with other MIHE related entities.

MIHE may collect personal information that students agree to provide or which is required to access a particular service. This includes information collected via online forms (including enquiry and application forms), events registration, or when subscribing to receive newsletters. MIHE will only use or disclose personal information under the following circumstances:

- for the purpose for which it was collected;
- for a related purpose which the person providing the information might reasonably expect;
- where the person has consented to the disclosure;
- where it is required by or permitted to do so by law;
- where it is necessary for the pursuit of MIHE's legitimate interests, such as facilitating teaching and learning; and
- where MIHE uses a contracted service provider or partner to perform legitimate functions on its behalf.

On some occasions MIHE may be required by law to use or provide personal information to others for other purposes. Wherever possible and reasonable, an individual's consent will be sought to use or provide personal information to others. Any transfer of sensitive information outside MIHE will be managed in accordance with the law.

Personal information will be collected from the individual concerned, except where this is unreasonable or impracticable. MIHE will only solicit and collect sensitive information if the individual consents to the sensitive information being collected. When MIHE solicits and collects sensitive information, all reasonable steps will be taken to explain the reasons for the information being collected; what will be done with the information; and any consequences if all or part of the information is not provided to MIHE.

MIHE will only adopt or assign a unique identifier (e.g. student or employee numbers) for an individual if it is necessary authorised by law, or with consent.

Quality and security of personal information

MIHE will ensure that the personal information it collects, uses, or discloses is accurate, up to date, complete, and relevant, having regard to the purpose of the use or disclosure. If a student or other stakeholder considers their personal information to be inaccurate, incorrect, incomplete, out of date or misleading, they can request that personal information to be amended. There is no charge for making a request to correct personal information.

MIHE will take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. MIHE relies on individuals to provide accurate and current information in the first instance, and to notify MIHE when circumstances or details change. Personal information may be stored in hard copy documents, as electronic data, or in MIHE software, databases or systems. MIHE protects personal information via various means including:

- Controlling physical access to MIHE premises and hard copy documents; and
- Controlling electronic access to MIHE's website, software, databases or systems with security measures such as password protection and security monitoring.

Information access

Staff who require personal information to carry out their responsibilities will be able to gain access to that information, but accessing information for any unauthorised purpose may constitute a breach of the *Code of Conduct* and associated policies and procedures.

MIHE will also provide individuals with the right to access or obtain a copy of the personal information that MIHE holds about them at no charge; however, a fee may be charged for providing a copy of this information. Requests by students to access or obtain a copy of personal information must be made in writing. Requests to obtain a copy of their personal information will be processed within 10 working with the student being advised how this will occur. Access to the personal information will be provided in a manner requested by the individual if it is reasonable to do so. Written requests for access to, or to obtain a copy of, or correct personal information held by the MIHE should be sent to: info@mihe.com.au.

Questions or Complaints About Privacy at MIHE

MIHE takes all complaints seriously, including privacy-related complaints. MIHE is committed to investigating and resolving privacy complaints in a timely, open, fair and transparent manner. Requests for information and complaints in relation to privacy at MIHE should be addressed to

info@mihe.edu.au. For further information refer to the *Student Complaints and Appeals Policy and Procedure.*