

Privacy Policy and Procedure - HGS

1. Scope

This policy is applicable to all prospective, current and former students of Holmes Grammar School (HGS) and persons involved with the collection or management of student personal information at HGS including staff and contractors.

2. Purpose

This policy provides clear principles and guidance on how HGS collects, stores, uses and disseminates student personal information.

3. Policy Principles

3.1 HGS adheres to the privacy legislative requirements including the:

- Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs)
- Privacy and Data Protection Act 2014 (VIC)
- Freedom of Information Act 1982 (Cth).

3.2 In compliance with the associated privacy legislation, HGS:

- a. Has a structured and transparent management system of personal information, including an up-to-date Privacy Policy and Procedure, and privacy statement on its website;
- b. Gives notice about collection of personal information where applicable;
- c. Advises how personal information can be used and disclosed;
- d. Ensures student personal information that it uses or discloses is accurate, up-to-date, complete and relevant, having regard to the purpose of the use of disclosure;
- e. Keeps personal information secure; and
- f. Provides students with access to and the opportunity to correct their personal information.

3.3 HGS will only collect student personal information for the purpose of enrolment and the provision of the education services, such as:

- a. To respond to a student's queries and requests;
- b. To keep a record of communication with in order to meeting our legal, regulatory and operational duties;
- c. To protect HGS and students from fraud and other illegal activities;
- d. To keep record of a student's academic progress;
- e. To process payments and to prevent fraudulent transactions;
- f. To provide information by email, web, text, social media and telephone about relevant services and events;

- g. To send communications required by law or which are necessary to provide information about HGS' changes to the services provided;
 - h. To comply with our contractual or legal obligations to share personal information if necessary, as described in Section 3.7.
- 3.4 When collecting student personal information, HGS will endeavour to collect the minimum necessary for HGS to provide services. Personal information collected by HGS may include the students'
 - a. Name;
 - b. Address;
 - c. Telephone number(s);
 - d. Date of birth;
 - e. Gender;
 - f. Citizenship;
 - g. Passport;
 - h. Visa details;
 - i. Identity card;
 - j. Emergency contact details;
 - k. Bank account or other financial details;
 - l. Educational history, including qualification, academic records, transcripts, English proficiency certificates; and
 - m. Disabilities or other health information.
- 3.5 All students need to inform HGS as soon as practical (and international students are required by their visa conditions to inform HGS within 7 days) about any changes in their personal address and contact details, together with emergency contact details.
- 3.6 HGS' information and databases are private and confidential. Student personal information is held in HGS' databases and appropriately secured from misuse, interference and loss and from unauthorised access, modification or disclosure.
- 3.7 Student personal information may only be disclosed:
 - a. To the Australian Government and designated authorities where the request is justified by law, including to the:
 - i. Department of Education, Skills and Employment;
 - ii. Department of Home Affairs;
 - iii. Tution Protection Service;
 - iv. VRQA
 - v. State and Federal Police Force;
 - vi. The external complaints or dispute agencies that students lodge their complaints with;
 - vii. Education Agents;
 - viii. HGS' contracted and professional services providers HGS may enter into arrangements with which may provide a service to students, such as

banks, IT provider and health insurance companies.

- b. On the reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the student or of other people;
 - c. To external debt collection agency to recover overdue tuition and non-tuition fees;
 - d. To HGS' legal advisers or other professional advisers or consultants engaged by HGS;
 - e. To any third party by which the student provides their authorised consent, such as employment verification organisations or other education providers; or
 - f. As otherwise required by law.
- 3.8 The information disclosed may only include personal information, course enrolment details and changes, and the circumstances of any suspected breach of student visa conditions.
- 3.9 When student personal information is shared with the third party listed in Section 3.7, the collection and use of the data will be under the terms of that third party's own privacy policy and HGS is not liable for any misuse of that data after it has been passed on to that third party.
- 3.10 Students will be provided access to their personal information via the Student Management System for verification purposes. Where any inaccurate information is identified and communicated by the student, HGS will rectify the information to ensure its accuracy.
- 3.11 The Grievance Policy and Procedures may be accessed by students if they have complaints in respect to their personal information or any potential privacy breaches by HGS. Should matters relating to privacy not be resolved, students may escalate matters to the Office of the Australian Information Commissioner: <https://www.oaic.gov.au/privacy/privacy-complaints/>.

4. Procedure Principles

Collection and Use of Information

- 4.1 HGS collects student personal information via the enrolment application form which is verified and updated through the orientation process as well as during the student's course of study.
- 4.2 All students must sign a declaration confirming that they understand and agree to the use of their personal information and appropriate disclosure, as outlined in Section 3.7, as a part of their application and written agreement with HGS.
- 4.3 HGS ensures that individual student personal information is up to date and will request students provide their latest personal information each term. The information will be updated within five working days in the Student Management System by Student Services staff.

Access and Correction of Personal Information

- 4.4 Students may request access to their personal information by contacting staff at reception of each campus. The student will be asked to state their past contact details for verification purposes before the records are amended. There are no fees for students to access their personal information.
- 4.5 HGS will respond to external requests for access to students' personal information as outlined in Section 3.7, within a reasonable period after the request is made. HGS is not obliged to provide a student with notice should an external request be made to access a student's personal information provided that an external request is legally made.

Publication of Personal Information

- 4.6 HGS will not publish any personal information without student's consent.
- 4.7 The signed student declaration in the Application Form and the Letter of Offer and Acceptance authorises HGS and its representatives to use student information to improve HGS' products and services.
- 4.8 Whenever a student provides HGS with their consent to use their personal information they have the right to change their mind at any time and withdraw that consent.

Storage and Security of Personal Information

- 4.9 HGS keeps all personal information records secure to prevent it from misuse, loss, or any unauthorised access, modification or disclosure (refer to the Records Management Policy and Procedures).
- 4.10 Student records which are no longer required are appropriately destroyed in accordance with the appropriate legislative requirements.

Complaints and Appeals

- 4.11 If a student has a complaint or would like to appeal a HGS decision regarding their privacy and personal information, the HGS Grievance Policy and Procedures will apply.
- 4.12 If a student is dissatisfied with HGS' response to their appeal, they can lodge a complaint with the Office of the Australian Information Commissioner. Information is available at <https://www.oaic.gov.au/privacy/privacy-complaints/>.

Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officer to ensure compliance with this policy.

Responsible Officer	Principal
Implementation Officers	All staff
Review Date	November 2026
Approved by	School Council
Associated Documents	Application Form Code of Conduct Policy

Grievance Policy and Procedures
Letter of Offer and Acceptance

Version	Brief Description of the Changes	Date Approved	Effective Date
1	New Policy transitioned from Holmes' generic policies	November 2023	November 2023