

# Student Records Policy - Higher Education

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**Policy Code:** STU-013      **Version:** 8.0      **Effective Date:** 9 July 2019

## Purpose:

This policy establishes the College's aims, objectives, criteria and procedures which shall apply to the academic records and personal information of higher education students. The College respects a student's right to privacy and any personal information that is provided by a student or potential student to the College is confidential. The following policy describes how the College will collect, use and store any personal information collected from higher education students or potential including for the purpose of FEE-HELP assistance and the repayment of FEE-HELP loans and other information gathered on enrolment.

As an organisation, the College is committed to complying with the Information Privacy Principles as defined in the Commonwealth of Australia [Privacy Act 1988](#).

In complying with the Commonwealth [Privacy Act 1988](#) the College shall meet the minimum standards for the collection, use and disclosure of personal information by the following methods. Academic records of students are ultimately the property of the College and it is the responsibility of the Office of Student Records to establish overall policy in this area.

**Definition of "College"** – *In the higher education sector, the Australian College of Natural Medicine Pty Ltd (ACNM) trades as Endeavour College of Natural Health, and Wellnation. For the purpose of this policy, any reference to 'College' or 'the College' should be considered a reference to each or any of these respective trading names.*

- Scope:**
- All staff
  - All higher education students
  - Alumni of higher education courses

## Policy Statement:

This policy ensures the integrity of academic records and personal information regarding the

following:

**Student Access:** A higher education student's access to their own academic records must be academically justifiable and administratively feasible.

**Right to Privacy:** A student's right to privacy in relation to his/her academic records are safeguarded as far as both internal access and external public access are concerned.

**Integrity of Information:** Consistency in the kinds of records collected, recorded, reported and filed and made available.

## Collection of information

The College shall only collect personal information that is required to carry out its legitimate educational activities. Information shall be collected in a legal and just manner and shall not, where reasonably possible, be intrusive in collection. Wherever practical, personal information will be collected directly from the individual concerned and the College will take all reasonable steps to ensure that the individual is made aware of the purpose for which the information is being collected. The College will undertake to ensure the collection of personal information does not intrude unreasonably on the personal affairs of the individual concerned and that the information collected is up-to-date and complete.

When collecting personal information, the College shall take steps wherever possible to inform the individual about:

- The identity of the organisation requiring the personal information
- The purpose of the collection of information
- The rights of access by the individual to personal information held by the College.

## Use and disclosure of information

The College shall only use or disclose information for the primary purpose (original reason for the collection of information) for which it was collected. The College will also use the information in order to provide products or services, to communicate with students and staff and to communicate with nominated people in the event of an accident or emergency. The College shall not use or disclose collected information for a secondary purpose (any other purpose than the primary purpose of collection) unless the individual has consented to the use or disclosure. The College does not sell personal information to external companies for the purposes of marketing. The College shall provide a reasonable opportunity for an individual to eschew from any activity that shall make use of their personal information.

## Data Security and Storage Processes

The College ensures that suitable storage arrangements and appropriate filing procedures exist with suitable security arrangements for all records that contain personal information. The College undertakes to employ all reasonable steps to ensure personal information is suitably protected and securely stored and is safe from misuse, loss, unauthorised access, modification or disclosure. The College uses physical, electronic and procedural safeguards to protect personal information held by the College. Personal information will be destroyed or de-identified when it is no longer required for either primary or secondary purposes. The College uses secure methods to destroy or de-identify any personal information. Refer to the [Records Management Policy](#) and [Disaster Recovery Plan](#).

The College will store information on students, for a period of time guided by the educational regulatory bodies such as the Tertiary Education Quality Standards Agency (TEQSA).

## Student Records

The official student academic record refers to information relating to a student's admission to an academic performance at the College. The official student academic record shall contain:

### Student Information

- i. Personal information which is acquired in the administration of official student academic records such as Name, student number, citizenship, address, date of birth etc.
- ii. Registration and enrolment information.
- iii. Results for each course and academic period.

### Student Interaction

- i. Student activities logged throughout the entire lifecycle of the student.
- ii. Supportive documentation on admission regarding the basis for any RPL or program credit obtained.
- iii. Results of formal grievance or other internal procedures as filed for by the student.
- iv. Medical information that is relevant to a student's academic performance. This is only provided at the request or consent of the student concerned.
- v. Letters of reference and supportive documentation related to formal procedures such as an application relating to a case of special circumstances.

## Access to Student Records

### Access by a Student

Under the Commonwealth [Privacy Act 1988](#) an individual has the right to access their personal

information unless prohibited by law. If requested, the College will provide to individuals access to and correction of their personal information held by the College at no charge. An individual may apply to receive a copy of their personal information held by the College and there is a nominal fee for this service.

There are certain circumstances where the College is not required to provide access. These circumstances can include:

- Where personal information other than health information would pose a serious threat to the life or health of an individual;
- Where health information would pose a serious threat to the life or health of an individual;
- Where providing access would have an unreasonable impact upon the privacy of other individuals;
- Access for frivolous or vexatious use;
- Where the information relates to existing or anticipated legal proceedings between the College and the individual, and the information would not be accessible by the process of discovery in those proceedings;
- Where providing access would reveal the intentions of the College in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- Where providing access would be unlawful.

If an individual considers the personal information to be incorrect, incomplete, out-of-date or misleading, the individual can request that the information be amended. Where an individual requests that a record be amended because it is inaccurate, but the record is found to be accurate, the details of the request for amendment will be noted on the record:

- A student's request to examine a part of his or her official student academic record should be made in writing to the Director of Student Services and Retention. Following receipt of request compliance shall occur within 30 days.
- A student has the right to challenge the accuracy of his/her official academic record.

### **Access by Alumni**

- An alumnus or alumna may examine and have copies made of the portion of his or her official student record as per the conditions outlined above for student access.
- A request from a former student shall be made in writing and shall be provided to the Director of Student Services and Retention. Upon receipt of request compliance will occur within 30 days.
- A former student shall have the right to challenge the accuracy of his/her official

academic record.

### **Access by College Staff**

Members of the academic and administrative staff of the College and relevant committees etc. shall have access to relevant portions of an official student academic record for purposes related to the performance of their duties. A staff member requesting information must have a legitimate need to have the requested information for the effective functioning of the position or office. Access to medical or sensitive information shall be granted to members of the academic and administrative staff only with the prior expressed or implied consent of the student. Such information is only accessible following self-disclosure by the student to the Director of Student Services and Retention and relevant or respective Access and Equity Officers on each campus.

The Head of Sales and Marketing shall have access to appropriate personal information on students and Alumni for the purpose of maintaining contact with Alumni.

### **Access by Others**

- Any information contained in the official academic record shall be released to other persons and agencies only with the student's prior expressed written consent (using the [Permission to Release Personal Information – Student](#) form), or on the presentation of a court order, or in accordance with the requirements of professional industry groups and associations, accrediting bodies and regulators and/ or otherwise under compulsion of law as outlined above.
- General statistical material drawn from academic records not disclosing identities of students or alumni may be released for research and informational purposes as authorised by the Director of Student Services and Retention in consultation with the Director of Education.
- General material drawn from academic records not disclosing identities of students or alumni may be released for survey or data collection purposes to entities acting on behalf of a Federal or State government department as authorised by the Director of Student Services and Retention in consultation with the Director of Education.

By the act of admission a student gives implicit consent for a minimal amount of information to be made freely available to all regulatory and government bodies for the purposes of compliance and data collection. The College may be required to provide personal information to designated authorities including the Australian Government as required by law. This may include, but is not limited to sharing information with the Department of Home Affairs; the Department of Education; the Department of Employment, Skills, Small and Family Business, the Australian Taxation Office (ATO); the Quality Indicator for Learning and Teaching project

(QILT); The Independent Tertiary Education Council Australia (ITECA); the Tuition Protection Service (TPS) Director; state and national regulatory bodies including VETAB (NSW), DET (QLD), TERC (QLD), VRQA (VIC), Board of Studies (NSW), and the Tertiary Education Quality Standards Agency (TEQSA).

For example student data for those students accessing Commonwealth supported funding (FEE-HELP) is provided to the Department of Education as a legislative requirement. Personal information may also be collected to assist in the assessment of an individual's entitlement to Commonwealth assistance under the *Higher Education Support Act 2003* and to allocate a Commonwealth Higher Education Student Support Number (CHESSN). This information will be disclosed by the Department of Education for these purposes. The Department of Education stores this information securely in its interactive database, HEIMS.

Personal information gathered for these purposes will not otherwise be disclosed without the individual's consent unless required or authorised by law.

Personal information about international students may also be shared with College representatives / agents in order to provide overseas students with services. This information includes personal contact details, course enrolment details and changes and the circumstances of any suspected breach by the student of a student visa condition ([National Code 2018](#), Standard 9).

### **Refusal of Access**

The College reserves the right to withhold access to the statements of results and transcripts of students and Alumni who have outstanding debts or obligations to the College in accordance with College policies.

The College does not release any official documentation to any other persons unless provided with the expressed written consent of the student on record.

## **Accessing Personal Information**

A student may request to view and if necessary correct their personal information held by the College at no charge at any time.

If a student wishes to receive a **copy** of their personal information held by the College they must lodge a written request to the Director of Student Services and Retention. The written request must include:

- Student ID number
- Details of the personal information requested
- The academic period/s to which the request relates.

There is a nominal fee of \$25.00 to cover administrative costs for the service of producing a copy of records.

## Personal Information Complaint Procedure

If a student considers that College administration has breached the policies and procedures set out in this policy or the [Privacy Policy](#), the student should in the first instance, discuss their concerns with Student Services at the campus where they lodged the initial information. Students are welcome to discuss their concerns with the Director of Student Services and Retention if they do not feel comfortable discussing the matter with the Student or Enrolment Adviser.

If a satisfactory resolution cannot be reached, the alleged breach of privacy should then be submitted in writing via the [Grievance Policy - Domestic Students - Higher Education](#). The complaint will be handled in accordance with the [Grievance Policy - Domestic Students - Higher Education](#) and the [Grievance Procedure – Higher Education](#).

## Retention of Student Records

Student records are retained according to the [Records Management Policy](#), the [Records Management for Temporary Records Policy](#) and the supporting [Retention and Disposal Schedule HE](#). While the official academic record of grades achieved by a student is retained permanently, all other records within a student file are considered temporary and will be destroyed when they reach the end of their required retention period set out in the [Retention and Disposal Schedule HE](#). Access to these parts of student records will not be available after the retention period has passed.

**Definitions:** A **Student** (or **Learner**) is an individual person who is formally enrolled to study at the College. The individual person is that who appears on the College's documents such as enrolment, admission and payment documents and who is assigned an individual student ID.

## Further Information:

**Related Policies:** [Grievance Policy - Domestic Students - Higher Education](#)  
[IT Disaster Recovery Policy](#)  
[Privacy Policy](#)  
[Records Management for Temporary Records Policy](#)  
[Records Management Policy](#)

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[Special Circumstances Policy – Higher Education](#)

**Related Procedures:** [Grievance Procedure](#)

**Related Documents:** [Disaster Recovery Plan](#)

[Permission to Release Personal Information – Students](#)

[Retention and Disposal Schedule HE](#)

**Guidelines /  
Legislation:**

[General Retention and Disposal Schedule](#)

[Higher Education Support Act 2003 \(HESA\)](#)

[National Code 2018](#)

[National Privacy Principles](#)

[Privacy Act 1988](#)

[Public Records Act 2002](#)



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<b>Version History</b>			
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0.1	10 Oct12	Jennifer Osborne	Original draft document
1.0	10 Nov 12	Jennifer Osborne	Approved by CEO
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