

Privacy Policy

1 POLICY STATEMENT

Blue Mountains International Hotel Management School Pty Limited ABN 91 004 004 317 (incorporating Australian International Hotel School, Hotel Kurrajong, E-Hotelier and Orion – to be known collectively as BMIHMS) is committed to ensuring the Privacy of all students, staff and contractors, and is committed to ensuring this policy is implemented. BMIHMS holds a large amount of information concerning staff, students and other persons including contractors, as a natural consequence of our business. This includes personal information which may not be available in the public domain. The privacy of persons about whom the school holds personal information must be respected at all times, this policy addresses circumstances in which privacy issues may arise.

Personnel information is defined under the Information Privacy Act as information or an opinion, whether true or not, about an individual whose identity is apparent, or can reasonably be found out, from the information or opinion.

2 PURPOSE

BMIHMS will collect personal information, only where it is necessary to carry out a particular function or administrative activity. Personal information may include home address, home telephone number, date of birth, marital status, next of kin, salaries and wages of staff, all information concerning students, their enrolment, academic performance, and medical information are some examples. It may also include visual images such as photographs or videos of people associated with the school. This policy shall apply to BMIHMS, its controlled entities and its affiliated bodies.

3 PROCEDURE

3.1 Collection

Where information is collected for a particular purpose, it should not normally be used for any other purpose. For instance, it is not acceptable to supply the names and addresses of students and staff to commercial providers of goods and services, even when particular benefits maybe offered without obtaining consent of the persons involved. Sometimes information may be obtained orally, in an interview and/or via an informal/formal conversation. This information may not be recorded in documentary form unless approval has been obtained by the individual party.

3.2 Access, Retention and Security of Records

Access to either paper based or computerised records should be sought and granted only where there is a demonstrated need for this, due to a staff member's functions or responsibilities. Even where access is granted, it would be deemed inappropriate, for instance, if an address, home telephone number or other information was accessed and used by a staff member for private reasons, e.g. to forward personal correspondence to a former flatmate, or to ascertain results of a friend and associates. This also includes situations where the person to whom the information relates gives permission.

3.3 Security of Records

Paper based records should not be left where members of the public, or others to whom the information they contain is not generally made available, may have the ability to access them. Records containing personal information should be filed securely.

Appropriate arrangements must be made at departmental level to ensure that access to computerised records is granted to people who are authorised in the course of their duties. Computer access passwords are intended as security devices and hence staff should not disclose their passwords to others.

3.4 Use

3.4.1 In collecting personal information the School will:

- only collect information for lawful purposes related to its function;
- only collect the information that is necessary and by lawful means;
- where possible only collect personal information that is provided by the individual to whom the information relates, collecting in a way that is not personally intrusive;
- where information is provided by someone else, ensure that collection has been authorised by the individual concerned, or by someone who is legally authorised to provide it on their behalf; and
- notify the individual concerned that personal information is being collected, either at the time of collection or as soon as practicable afterwards.

3.4.2 The School will declare to individuals from whom information is collected:

- the purpose for collecting the personal information;
- whether or not the collection is voluntary and any consequences for not providing it;
- how the information is to be held and the intended recipients;
- the name and address of any agency used to collect information on the School's behalf; and
- how individuals can obtain access to their information, check it for accuracy and completeness, and make application to correct it.

3.5 Disclosure

3.5.1 The School will manage personal information responsibly by:

- taking reasonable steps to ensure that personal information held is relevant to the purpose for which it was collected, accurate, up to date and not misleading;
- retaining personal information for no longer than necessary; then disposing of it securely in accordance with approved methods;
- protecting it from loss or unauthorised access, use, disclosure, or misuse; and from unauthorised modification;
- taking reasonable steps to prevent its disclosure without authorisation by external service providers; and
- only disclosing personal information outside the School or its affiliated bodies where:
 - its disclosure has been consented to by the individual to whom it relates. The individual acknowledges this by signing the Privacy Waiver on the Application for Admission form; or
 - its disclosure is required by law and requested in an authorised written form; or
 - it is reasonably believed to be necessary to prevent or lessen a serious threat to life or health of any person.

4. COMPLAINTS

Any individual, in respect of whom personal information is obtained by BMIHMS, has the right to complain (as per the *Non Academic Complaints and Grievances Policy & Procedure*) about an act or practice that the individual believes to be an interference with the privacy of that individual.

BMIHMS will investigate a complaint as soon as practicable following a perceived breach of this policy. A report will be generated and sent to the Chief Executive Officer, Campus Directors and/or Department Heads concerned following a complaint in reference to privacy matters. The person making the complaint will also be consulted in reference to the findings and any recommended improvements.

5. REVIEW OF POLICY

BMIHMS will review this policy as part of its continuous improvement program and as per the BMIHMS's internal audit program and/or as changes to statutory legislative obligations occur.

6. DOCUMENTATION

Non-Academic Complaints & Grievance Policy & Procedure
Privacy Notification and Waiver