



BURGMANN COLLEGE INCORPORATED PRIVACY POLICY

1. Name of policy

This is the *Burgmann College Incorporated Privacy Policy*, (*Privacy Policy*).

2. Commencement

This policy commences on 9 June 2020.

3. Statement of Intent and Scope of Policy

- 3.1 Burgmann College Incorporated, 'we', collect personal information in the course of carrying on our business as an independent residential college affiliated with the Australian National University.
- 3.2 We take your privacy seriously. This privacy policy outlines our approach to managing your private information provided to us in relation to Burgmann College's operations and the Burgmann College Website (www.burgmann.anu.edu.au) under the Australian Privacy Principles as outlined in the [Privacy Act 1988](#).
- 3.3 This Privacy Policy only applies to Burgmann College Incorporated. It does not apply to any other company or organisation we may associate with, including organisations whose services are in some way linked to Burgmann College through online content or services (such as apps, or social media platforms). If you choose to communicate with us or access information about Burgmann College through a social network service or app, the social network or app provider and its partners may collect, hold, use or disclose your personal information, in Australia or overseas, for its own purposes and according to its own policies. This policy does not apply to those services.
- 3.4 Burgmann College has a specific privacy policy for the 'Burgmann College Alumni Application and Burgmann College Alumni Desktop Platform'. See the Resources at number 15 for further information.

4. Definitions

- 4.1 **Personal information** means information or an opinion about an individual who is identified, or who can reasonably be identified, from the information, whether or not the information or opinion is true or recorded in a material form, and includes sensitive information; and
- 4.2 **Sensitive information** means information or an opinion, that is also personal information, about a person's racial or ethnic origin, political opinions, membership(s) of political, professional and/or trade associations and unions, religious or philosophical beliefs, sexual orientation or practices, criminal history, health information, and genetic and biometric information.

5. What kind of personal information does the College collect?

- 5.1 We collect personal information for the purposes of our core business of providing educational and academic programs, residential accommodation for our residents and affiliate students, and for a range of internal College purposes as described in 5.4.
- 5.2 The information collected may be about:
 - current residents or applicants;
 - the parents or guardians of current residents and applicants;
 - other residents of the College;
 - staff members, residential staff members and job applicants;
 - alumni;
 - donors;

- volunteers;
 - consultants or contractors;
 - Council members;
 - visitors and guests of the College;
 - other people who come into contact with the College.
- 5.3 The personal information we collect about you may include, but may not be limited to: name, contact details, date of birth, nationality, gender, medical information, photograph, dietary requirements, occupation, qualifications, relationship to students or residents, enrolment and academic results, IT network usage, pastoral care, health and wellbeing, misconduct and discipline.
- 5.4 The purposes we collect this information for include:
- 5.4.1 for **residents**, to administer your admission, to protect and promote your wellbeing and deliver pastoral care, to assist with your academic progress, in order to run discipline processes, to assist with your accommodation, to enable your access to College facilities and services, in relation to your fees, for financial support purposes, and in relation to graduates, for alumni activities;
- 5.4.2 for **employees, volunteers, Council members, visitors, sub-contractors, alumni, friends, donors** to administer pay, entitlements, performance, access to College facilities and services, in relation to work health and safety, in relation to rehabilitation and compensation matters, in relation to philanthropic and College advancement activities, and in relation to College Council governance matters.

6. How is personal information collected?

- 6.1 Personal information is collected in digital form, on paper, and in photographs, film and video recordings.
- 6.2 Information is collected:
- from application forms (for example, for entry to College and for scholarships);
 - when interviewing or meeting with students or residents or prospective students or residents and their parents and guardians;
 - when receiving payments or donations;
 - when receiving course enrolment information and academic results from the Australian National University and other institutions;
 - from question or survey forms administered to students;
 - from enrolment or subscription forms for student, parent or alumni programs or events;
 - from correspondence;
 - when receiving applications or bookings for conferencing, accommodation and external events;
 - when photographing or recording student or alumni events held within College or in which students or alumni participate outside of College.
- 6.3 Personal information is collected by College staff during the day-to-day administration of the College and attendance of residents and staff in the College. Personal information is also collected by automated systems within the College's IT network resources.
- 6.4 The College may seek to collect and update personal information via email or by other digital methods, by telephone, by mail or in person.

7. Use and disclosure of personal information

- 7.1 Common situations in which we collect, hold, use and disclose personal information include:
- governance, administration and management of the College;
 - employment and management of staff;
 - admission and readmission of students;

- providing network resources including internet access and Wi-Fi for students, residents, staff and visitors;
 - invoicing and collecting fees and charges;
 - health, welfare and pastoral care of students, residents and staff;
 - providing academic programs and monitoring academic performance of students;
 - awarding and administration of scholarships, bursaries and prizes;
 - supporting student activities including social, cultural and sporting activities;
 - facilitating the management of sporting and cultural competitions;
 - managing student conduct issues and disciplinary processes;
 - soliciting and receiving donations;
 - organising resident, alumni and other College events;
 - managing relationships with alumni and alumni associations;
 - maintaining an electoral roll and conducting elections for members of College Council;
 - marketing and promotions;
 - publishing magazines, newsletters, websites, and social media posts;
 - permitted general or health situations under *the Privacy Act 1988* (Cth).
- 7.2 We generally use or disclose personal information only with your consent and for the purpose we collected it, unless you consent to us using or disclosing it for a different purpose, or if it is otherwise permissible under Australian Privacy Law. Further, with respect to residents, we generally do not disclose personal information about residents to a resident's relatives without the resident's consent. For instances where we may disclose to a resident's relatives such as a next of kin or emergency contact, see 8.2.
- 7.3 We may also collect, use or disclose personal information in situations where it may be impracticable to obtain your consent or give you prior notice, if we reasonably believe it is necessary to do so, such as:
- to lessen or prevent a serious threat to life, health or safety;
 - when we are required or authorised to do so by or under a law;
 - to take appropriate action in relation to suspected unlawful activity or serious misconduct;
 - to assist authorities to locate a person reported as missing;
 - establishing or defending a legal or equitable claim, or participating in a confidential dispute resolution process; or
 - for enforcement related activities conducted by, or on behalf of, an enforcement body.
- 7.4 Where disclosure of personal information to another party is reasonably required, disclosure will only be made on a confidential basis and subject to the application of the Australian Privacy Principles to that party, if it is reasonable and practical to do so.
- 7.5 Furthermore, we may disclose personal information about you:
- if disclosure is required by law; or
 - to law enforcement authorities for the purpose of investigating or prosecuting criminal or other unlawful acts; or
 - as authorised by a Resident Contract; or
 - in accordance with provisions of the published College rules or policies; or
 - in accordance with the *ANU Colleges Affiliation Statute 2013*, or the *ANU Colleges Affiliation Rules 2013* as agreed between the Australian National University and its affiliated residential colleges;
 - in the course of collecting outstanding debts; or
 - as otherwise provided for under Australian Privacy Law.
- 7.6 We may disclose personal information to an internal review body of Burgmann College if you seek a review of a Burgmann College decision or

make a complaint through an internal review process at the College, for example, under the [Burgmann College Appeals and Grievance Policy and Procedures](#) process, [Burgmann College Rules](#) or other College policy or procedure.

- 7.7 We may disclose personal information to an external complaint handling body if you seek a review of a Burgmann College decision or make a complaint with an external body, such as the ACT Human Rights Commission or Fair Work Ombudsman.

8. Security of personal information

- 8.1 We store personal information under the control of the Principal and authorised staff:
- electronically in onsite data storage media;
 - electronically in cloud-based offsite storage;
 - in paper-based files kept onsite or archived offsite.
- 8.2 We have implemented measures to ensure protection of personal information from misuse, loss, unauthorised access and modification, or improper disclosure.
- 8.3 Except as otherwise provided in this Policy, we do not grant access to personal information to outside parties unless legally required to do so.
- 8.4 We take reasonable steps to destroy or de-identify information that is no longer required for use, after any period of time for which we are legally required to retain the information.

9. Access to your personal information

- 9.1 You may apply for access to the personal information about you held by the College and you may inform us of any information held which you believe is not correct.
- 9.2 If your personal details change, such as your mailing or email addresses, or telephone number, please contact the College to update your details online through the website or by sending us an email or letter. When we become aware that your details have changed we will update them.
- 9.3 To access personal information the College holds about you, please contact the College's Privacy Officer, at privacy@burgmann.anu.edu.au.

10. Sending information overseas

- 10.1 We may send personal information about an individual to overseas recipients. This is most likely to occur when providing information about residents or alumni who have applied for positions or scholarships at overseas institutions or employers, or to facilitate exchanges with overseas educational institutions.
- 10.2 We may also send personal information overseas when storing it with cloud service providers situated outside Australia.
- 10.3 We will not disclose personal information to an overseas recipient without:
- a) taking reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to that information; or
 - b) obtaining the individual's consent to the disclosure (in which case (a) will not apply).

11. Burgmann College Website Information Technology

- 11.1 Our website, www.burgmann.anu.edu.au, may use Cookies. Cookies are data that a website transfers to a computer's hard drive for record-keeping purposes. Cookies can facilitate your ongoing access to and use of our site by remembering information about you at a later time. If you do not want information collected through the use of Cookies, you can disable the Cookie function in your browser. You should note that Cookies may be necessary to provide you with some features on the College website.

- 11.2 Entry to some Burgmann College web services is restricted by user log-in protocols. For example, we require residents to use their University ID to access the resident portal on the Burgmann website in order to access some features such as the Log A Job system.
- 11.3 Our website may contain links to other sites. We are not responsible for the privacy practices or the content of other sites.
- 11.4 Information about yourself that you disclose by posting it on bulletin boards, chat rooms or social media and similar digital media platforms may become public information. If you disclose your personal information, or that of residents and staff, we cannot protect that personal information.
- 11.5 We require all residents and staff to respect and protect the personal information of others. For more information, contact the College Privacy Officer at privacy@burgmann.anu.edu.au

12. Questions or complaints

- 12.1 If you have a question about the application of our Privacy Policy, please contact College Privacy Officer at privacy@burgmann.anu.edu.au, or by post to:

Attention:
Privacy Officer
Burgmann College
52 Daley Road
Canberra ACT 2601
Australia

- 12.2 If you have a complaint about the collection, use or destruction of your personal information, your complaint should be directed in the first instance to the College Privacy Officer at privacy@burgmann.anu.edu.au. We will investigate your complaint and attempt to resolve any breach of the Australian Privacy Principles that might have occurred in accordance with the Privacy Act.

If you are not satisfied with the outcome of this procedure, then you may ask for a review by a senior officer at Burgmann College (if that has not already happened) or you can contact an independent body (usually the Office of the Australian Information Commissioner) to ask them to investigate your complaint.

13. Review of policy

This document will be reviewed annually unless otherwise required. The next review date will be June 2021.

14. Relevant documents and related resources

- [The Australian National University Privacy Policy](#)
- The [Burgmann College Appeals and Grievance Policy and Procedures](#) document
- The [Burgmann College Incorporated Rules](#)
- [Other Burgmann College policies and procedures](#)
- The Burgmann College Alumni Application and Desktop Platform Privacy Policy [not yet in force]

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