



Privacy Policy

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Modification history

Date	Modification	Person responsible
17/01/12	Modification of existing policy	Dr Ian Whyte
6/11/2012	Addition of the Changes to the Policy section	Gerald Lipman and Ian Whyte
4/9/2013	Change title of Principles	Roger Stevens, Gerald Lipman and Ian Whyte
30/7/2018	Review to clarify application to website and official social media engagement and refine other matters in the policy. Note alignment with the EU General Data Protection Regulation (GDPR)	Natalie Simmons, George Brown and Gerald Lipman
05/12/19	Information added in relation to the needs of Aboriginal and Torres Strait Islander peoples and their traditional cultural practices	George Brown and Gerald Lipman

Definitions

Preamble

The International College of Hotel Management (ICHM) is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This Privacy Policy has been updated to also comply with the EU General Data Protection Regulation (GDPR).

This policy outlines how ICHM uses and manages personal information provided to, submitted to or collected by it. This includes personal information which is provided to ICHM via the ICHM website or official social media channels.

ICHM may from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing college environment.

Accessing the ICHM website or official social media channels and/or providing personal information to ICHM confirms acceptance of and consenting to this Privacy Policy.

In implementing this policy, ICHM staff will remain supportive and sensitive to the needs and traditional cultural practices of Aboriginal and Torres Strait Islander peoples. For more information, please refer to the *Diversity, Equity and Inclusion Policy*.

Collection of personal information

ICHM collects personal information, including sensitive information about:

- students and parents and/or guardians
- potential students
- former students, graduates and alumni
- staff members, job applicants, volunteers and contractors
- potential employers and industry partners
- agents, school professionals and other people who come in contact with the ICHM.

Personal information you provide:

ICHM will generally collect personal information held about an individual by way of forms filled out by parents or students, face to face meetings, interviews, telephone calls, online submission, interaction via official ICHM social media platforms or email enquiries. On occasions, people other than parents and students provide personal information in relation to students and potential students.

Personal information in relation to staff members, potential staff members, volunteers and contractors is collected via applications for employment, during interviews, via a range of correspondence, including electronic, and ongoing face to face meetings.

Personal information provided by other people:

In some circumstances, ICHM may be provided with personal information about an individual from a third party, for example a report provided by a medical professional, an agent, another school or industry newsletters and trade journals.

Exception in relation to employee records: Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the College's treatment of an employee record, where the record is directly related to a current or former employee of ICHM.

Use of personal information

ICHM will use personal information it collects for the primary purpose of communicating with potential students, students and graduates, maintaining student and employee records and providing hotel management education and for such other secondary purposes that are related to the primary purpose and are reasonably expected or for which consent has been granted.

Information on students and parents:

The purposes for which ICHM uses personal information of students and parents include:

- to keep students informed about matters related to them, through correspondence, newsletters and magazines
- day to day administration of the College
- looking after a student's educational, social and medical wellbeing
- arranging and managing a student's industry placement
- marketing for the College
- satisfying our various legal obligations (including the preservation of academic records) and allowing the College to discharge its duty of care.

ICHM may not be able to enrol or continue the enrolment of a student if necessary information about the student or parent is not provided.

Information on job applicants, staff members, volunteers and contractors:

In relation to personal information of job applicants, staff and contractors, ICHM's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, to maintain adequate personnel and professional development records and to comply with statutory requirements.

The purposes for which ICHM uses personal information of job applicants, staff members and contractors include:

- administering the individual's employment or contract
- satisfying insurance requirements
- marketing for the college
- satisfying ICHM's legal obligations.

ICHM destroys personal information provided by job applicants 6 months after consideration of the application is completed.

Information on agents, employers, school teachers and other education professionals:

ICHM maintains records of employers who accept students as part of the co-operative industry placement education process and vocational education professionals who partner with ICHM to provide to school students, quality advice and material to support career choice. Printed material of interest to prospective students and other promotional material distributed to education professionals and to industry partners ensure that ICHM continues to be a quality learning environment engaged with industry.

ICHM publications, such as newsletters and magazines, which include personal information and sometimes visual images, may be used for marketing purposes.

Disclosure of personal information

With consent, ICHM may disclose personal information, including sensitive information held about an individual to:

- another school or university
- government departments
- medical practitioners
- people providing services to the college, including educational specialists and visiting lecturers
- recipients of ICHM publications, such as newsletters and magazines
- newspapers and trade journals
- parent associations/committees
- potential employers, including for industry placement
- other parents or guardians or
- anyone you authorise the college to disclose information to

ICHM will not sell or rent any personal information, including sensitive information.

For avoidance of doubt, we may disclose your personal information to any of our related and associated companies, affiliates and subsidiaries, including those established in the future.

Sending information overseas:

ICHM will not send personal information about an individual outside Australia without:

- obtaining consent of the individual (in some cases, consent will be implied) or
- otherwise complying with the Australian Privacy Principles

Sensitive Information

In referring to 'sensitive information' ICHM means information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences, criminal record and health information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the person agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

Computer Usage

Computers are provided for students at ICHM. While ICHM's interest is to prevent illicit, illegal and excessive usage, students should be aware that ICHM will monitor usage with regard to the sites visited and the items down-loaded.

Updating Information

ICHM endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by ICHM at any time.

Consent

ICHM seeks consent for the release of personal information, in specified circumstances, in the ICHM Application Form.

ICHM will refer any further requests for consent and notices in relation to the personal information of a student to the student alone, unless consent has been provided by the student in writing. ICHM will discuss general information with parents who have signed the application form for entry to ICHM as sponsor/guardian. However sensitive information will not be released without specific approval.

An individual has the right to revoke consent at any time.

Your rights

An individual has the following rights:

- Right of access and verification

Under the Commonwealth Privacy Act, an individual has the right to request access to any personal information which ICHM holds about them and to advise ICHM of any perceived inaccuracy.

There are some circumstances where access may be denied. Such circumstances would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in the breach of ICHM's duty of care to the student.

Students will have access to their own personal information, unless they are less than 18 years of age, in which case their parents will have independent access. Students may authorise their parents to have access to their own details.

Requests to access or amend any information ICHM holds about you, or your child, should be forwarded in writing to the Chief Executive. ICHM may require you to verify your identity and specify what information you wish to view.

- Right to ask for your personal data to be de-identified or deleted

ICHM is bound by legislative requirements to retain personal data in relation to students, graduates, staff and ex-staff.

ICHM will remove individuals from general and marketing correspondence on request. This includes unsubscribing from electronic publications and e-messaging.

- Right to secure storage of your data

ICHM's staff are required to respect the confidentiality of students', parents' and guardians' personal information and the privacy of individuals.

ICHM has in place steps to protect the personal information ICHM holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and appropriate electronic data security hardware and applications and, where appropriate, password protected access rights to computerised records.

Personal information and data collected electronically or via the ICHM website or official ICHM social media platforms is transferred to ICHM and managed by ICHM securely.

- Revoke consent

An individual has the right to revoke consent for personal data to be provided to a third party where ICHM is not bound by a legal requirement to provide such data.

Contact Details

Requests to access or amend information held by ICHM should be directed to:

The Chief Executive
International College of Hotel Management
GPO Box 249
Adelaide SA 5001

Phone: 61 (0)8 8228 3610
Free Call within Australia: 1800 246 875
Facsimile: 61 (0) 8228 3684

Changes to the Policy

The Chief Executive and Principal must approve any change to this Privacy Policy and Procedure.