



DUNMORE LANG COLLEGE

An Affiliated Residential College at Macquarie University

# **Dunmore Lang College Privacy Policy**

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**Privacy Policy**

**Policy Title:        PRIVACY POLICY**

**Approved by:        Dr Alasdair Murrie-West, Principal, Dunmore Lang College**

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## 1. COMMITMENT TO PRIVACY AND RESPONSIBLE USE OF PERSONAL INFORMATION

The privacy of personal information, credit information and sensitive information as defined by the Privacy Act 1988 ("personal information"), however received, is important to Dunmore Lang College ("the College"). The College is bound by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988.

This Privacy Policy describes our policies and practices in relation to how the College collects, stores, uses and discloses personal information provided to or collected by it.

It also contains information about how an individual may access his / her personal information, seek correction of such information (where necessary), complain about a breach of the privacy laws and how the College will deal with such a complaint.

## 2. COLLECTION OF PERSONAL INFORMATION BY THE COLLEGE

'Personal information' means any information or opinion about an individual, from which the individual is, or may be, identified.

'Sensitive information' includes information about an individual's race, religion, trade union membership, political opinion, health, sexual preference, criminal record, genetic or biometric information.

The College collects a range of information, including personal information, in connection with its core business of providing:

- residential accommodation for undergraduate and post graduate local and international students ("Students");
- pastoral and academic programmes for its Students; and
- conference facilities, external events and casual accommodation for Students and non-students.

The College also collects information that can readily identify an individual, and includes paper, electronic records, video recordings and photographs, about:

- Students;
- New applicants for residence in the College;
- The parents and/or guardians of students ("Parents") before, during and after the course of a student's contracted period at the College;
- Job applicants, staff members, volunteers, alumni, donors and contractors; and
- Other people who come into contact with the College and its residents.

The College will collect personal information only when it is reasonably necessary for one or more of its functions or activities. The College will only collect sensitive information relating to an individual with the consent of that individual.

## 3. TYPES OF PERSONAL INFORMATION WE COLLECT

In general, the type of information which we collect and hold includes, but is not limited to:

- Personal details, such as full name, residential address, contact details, date and place of birth, nationality, gender, whether or not a Student is Aboriginal or Torres Strait Islander;
- Macquarie University student number;
- Any criminal or medical information to the extent that it is relevant to the functions of the College;
- Dietary requirements;
- Occupation, (if any) and relationship to Student (if a parent/guardian);
- In some instances, we will also need to obtain social security taxation and financial details (e.g. required to verify means-tested scholarship applications);
- Academic records;
- Internet data (including user behaviour data), IP addresses, social media profiles, LinkedIn URLs, and custom profiles;
- Records of a Student's communications and other interactions with the College.

## 4. HOW DOES THE COLLEGE COLLECT PERSONAL INFORMATION

The College will collect personal information directly from a Student unless the Student is a minor and the information must be collected from their parent or guardian or the Student has consented to and/or instructed that collection of their personal information can be made from a third party, where it is unreasonable or impractical to make a direct collection and/or where the College is required or authorised by law to collect their information from a third party.

The College may collect personal information when:

- Responding to student requests for information or brochures;
- Reviewing applications for residency, leadership applications, affiliate membership or scholarships;
- Processing student registration for programmes and events;
- Processing student requests for registration for alumni activities;
- Provision of pastoral care services;
- Meeting and other records of communications with students;
- Conducting investigations of student conduct and complaints;
- Provision of subject tutorials and other academic programmes;
- Provision of leadership programmes;
- Interview of Students to review of student progress at College and in academic performance;
- Provision of sponsorships and donations (including in-kind and volunteering);
- Review of reports from Pastoral Care Staff including, but not limited to, the Principal, Dean of Students, Community Manager, Senior Duty, Senior Residential Adviser and Residential Advisers;
- Provision of conferencing, external events and casual accommodation.

From time to time the College may collect and update personal information over the telephone, via the internet, in person and/or in writing.

If the College receives personal information from someone other than a Student to whom the personal information relates, the College will consider whether it is entitled to collect the information. If the information is not relevant to any of the functions or activities of the College and/or collection of the personal information would require consent that has not been obtained, the College will destroy or de-identify the personal information it has collected.

## 5. USE OF PERSONAL INFORMATION

We collect and use personal information in order to carry out the College's core business, which involves, but is not limited to, undertaking the following activities:

- Processing applications for residency in the College;
- Processing scholarship applications;
- Processing applications for student leadership roles and mentoring opportunities;
- Providing educational tutorials and programmes;
- Providing pastoral care services;
- Communicating with hospital, health care and medical professionals;
- Applying for and administer College funding from private, governmental and other sources and associated reporting;
- Communicating a Student's dietary requirements to the kitchen and catering staff;
- Distributing a Student's personal information on a confidential basis to the Principal, the Dean of Students, the College's consultants and contractors, the administration staff of the College and to the Resident Advisers responsible for the Student;
- Arranging and co-ordinating student sporting, cultural and other activities and events;
- Communicating with Macquarie University in connection with student enrolments, scholarship applications, academic progress, security issues and health issues;
- Providing services in connection with intercollegiate and university programmes;
- Undertaking investigations and implement disciplinary procedures associated with student responsibility conduct or incidents involving current and / or past students;

- Providing information to third parties as authorised or required by law;
- Analysing students' interaction with the College's personal and electronic services (including its website) for the better delivery of the College's core business;
- Maintaining College records;
- Using personal information in connection with an ongoing civil or criminal law action involving the Student;
- Using the personal details of all past students for Alumni purposes.

The College will not use personal information or disclose it to another organisation unless permitted to do so under the Privacy Act. Permitted situations include situations in which:

- It is reasonably necessary for one of the purposes described above;
- Having regard to the nature of the information or the circumstances of collection the College believes that the individual would expect the College to use the information or make the disclosure;
- It is required or authorised by law or court or tribunal;
- The College reasonably believes that the collection, use or disclosure is necessary to lessen or prevent serious threats to the life, health or personal safety of another student or member of the College, or to public health or safety, and it is unreasonable or impracticable to obtain the relevant individual's consent;
- The College has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the College's functions or activities has been, is being or may be engaged in, and the College believes that the collection, use or disclosure is necessary in order for the College to take appropriate action;
- The College reasonably believes that the use or disclosure is reasonably necessary to assist an entity, body or person to locate a person who has been reported missing and the use or disclosure complies with rules made by the Office of the Australian Information Commissioner;
- It is to obtain third party services, for example to carry out data analysis or provide information processing services. The use of a Student's information by third parties is strictly controlled. All service providers that have access to personal information held by the College are required to keep the information confidential and not to make use of it for any purpose other than to provide services in accordance with their engagement with the College; or
- The individual has provided consent.

## 6. IF PERSONAL INFORMATION IS NOT PROVIDED

Without an applicant's personal information the College will not be able to process the applicant's application for residency in the College nor provide students with services relevant to the College's core business.

## 7. SECURITY OF PERSONAL INFORMATION

We store information in a number of secure databases, paper-based files and/or other record keeping methods. We have taken steps to ensure the protection of personal information from misuse, loss, interference, unauthorised access and modification or disclosure.

We keep a Student's records and file for a minimum of 7 years following the student's departure from College. We keep a Student's personal contact information, College roles, scholarships & academic awards indefinitely for Alumni purposes.

Where we are obliged to comply with legal or statutory requirements for retaining information for a prescribed period of time, we comply with those requirements.

Otherwise, we destroy or de-identify information that we no longer require.

We undertake to acknowledge and investigate promptly any complaints about the way we manage personal information.

## 8. ACCESS AND UPDATE TO PERSONAL INFORMATION

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. If your personal details change, such as your mailing address, email address or telephone number, please contact us to update your details.

Under the Australian Privacy Principles, an individual has the right to obtain access to any personal information which the College holds about them and to request the College to correct any perceived inaccuracies.

Upon receipt of enough information to allow us to identify the information, we will tell the individual what personal information we hold about them. We will also correct, amend or delete their personal information if we agree it is inaccurate, irrelevant, out of date or incomplete.

We do not charge for receiving a request for access to personal information or complying with a correction request.

In some limited situations, we may need to refuse access to an individual's information or refuse a request for correction. We will advise the individual as soon as possible after their request if this is the case and the reasons for our refusal.

To access or correct personal information the College holds, please contact the Chief Financial Officer, who is the College's Privacy Officer, at email: [cfo@dlc.nsw.edu.au](mailto:cfo@dlc.nsw.edu.au)

## 9. SENDING INFORMATION OVERSEAS

The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with Cloud service providers which are situated outside Australia or to facilitate a college exchange.

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

- obtaining consent of the individual; or
- ensuring that the overseas recipient is regulated by laws which protect your personal information in a way that is similar to the Privacy Act. If they are not, we will take reasonable steps to ensure that they protect a Student's information in the same way that we do or seek the Student's consent before disclosing their information to the overseas recipient.
- However, the College does store personal information in the Cloud, which means that it resides on servers which are situated outside Australia. There may be College, Student and Alumni Facebook or LinkedIn accounts, for example, that facilitate communication between Alumni but are not maintained on the College server.

If a Student provides personal information to us about other people, we encourage the Student to inform them of the above matters.

## 10. STUDENT CONSENT TO THE COLLECTION, USE, RETENTION AND DISCLOSURE OF PERSONAL INFORMATION BY THE COLLEGE

It is the policy of the College that before the College accepts a Student's acceptance of an offer to be a resident of the College, the Student must provide the College's Privacy Consent Form in which the Student affirms that they:

1. Has read and accepts this Privacy Policy;
2. Agrees to provide any personal information that is requested by the College and which is consistent with this Privacy Policy;
3. Agrees to the collection, use and retention of his / her personal information by the College in accordance with this Privacy Policy.

## 11. COMPLAINTS

If an individual requires further information about the handling of their personal information or has a complaint about our Privacy Policy or has any concerns about whether we have complied with the Privacy Act, the APPs or this Privacy Policy, their complaint should be directed in the first instance to the Privacy Officer at [cfo@dlc.nsw.edu.au](mailto:cfo@dlc.nsw.edu.au) who will respond with a decision within a reasonable time, usually within 30 days of making the complaint.

We will investigate the complaint through our internal complaints resolution process and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of personal information held by the College in accordance with the Commonwealth Privacy legislation.

If an individual is not satisfied with the outcome of this procedure then they may contact us further to advise of their concerns and, if we are unable to reach a satisfactory resolution they may write to the Office of the Australian Information Commissioner using the form available at this link <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> for further review of their complaint.

## 12. INFORMATION TECHNOLOGY

The College currently uses Macquarie University IT services as an external Information Technology network provider. Students should consult the privacy statements and the terms and conditions of the Macquarie University's IT Policy.

The College provides an Ethernet cable service in the College's games room and to some rooms. Students should consult the privacy statements and the terms and conditions of the College's IT Acceptable Use Policy.

## 13. COOKIES

Cookies are data that a website transfers to an individual's hard drive for record-keeping purposes. Cookies can facilitate a Student's ongoing access to and use of a site by remembering something about them at a later time. If a Student does not want information collected through the use of Cookies, they can disable the Cookie feature in their browser. Please note that Cookies may be necessary to access some features on the College website.

## 14. EXTERNAL LINKS

Our site may contain links to other sites. The College is not responsible for the privacy practices or the content of such web sites.

## 15. PUBLIC INFORMATION

Any information posted on bulletin boards and/or communicated in chat areas becomes public information. While we strive to protect and respect our Students' privacy, we cannot guarantee the security of any information they disclose in a chat room, social or other digital media platforms and/or on an information or bulletin board, whether of an electronic or physical nature and whether situated within or outside the College.

## 16. UPDATING THIS POLICY

This Privacy Policy was prepared on 23 December 2021 and approved in January 2022.

The College may from time to time, update and review this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains relevant to any changes in the residential college environment or in the College's future directions. The new version will be published on our website.

### Contact

For more information contact the College via: [cfo@dlc.nsw.edu.au](mailto:cfo@dlc.nsw.edu.au)