



## ***Privacy Policy***

### ***Purpose***

This privacy policy outlines the personal information handling practices of the Australian National University Students' Association (ANUSA).

### ***Overview***

Privacy is important to ANUSA and the students and stakeholders we support. This policy is made in compliance with the Privacy Act 1988 (Cth) ('Privacy Act'). We will update this privacy policy if our personal information handling practices change. Further information about the legal obligations of ANUSA when collecting and handling your personal information are outlined in the Privacy Act and in the Australian Privacy Principles in Schedule 1 of that Act.

### ***Scope***

This policy applies to the Australian National University Students' Association (ANUSA).

### ***Definitions***

**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

**Sensitive information** means information or an opinion that is also personal information, about a person's racial or ethnic origin, political opinions, memberships of political, professional and trade associations and unions, religious and philosophical beliefs, sexual orientation or practices, criminal history, health information, and genetic and biometric information.

### ***Policy statement***

#### ***Personal Information we collect***

We collect, hold, use and disclose your personal information to enable us to meet legal obligations and for a range of Association purposes. We may collect or receive personal information from students, employees, visitors, contractors, and others who interact with ANUSA or our members.

Except where permitted under the Privacy Act, we will collect your personal information directly from you. Sometimes material that contains your personal information is created by us when we perform some of our processes. This material is also protected and handled in accordance with this privacy policy.

### ***Collection or receipt without consent***

We may also collect, receive, use or disclose your personal information in situations where it may be impracticable or unreasonable 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, misconduct, maladministration or non-compliance with constitutional, legal or financial requirements;
- to assist authorities to locate a person reported as missing;
- providing legal advice, or establishing, exercising or defending a legal or equitable claim, or participating in a confidential dispute resolution process;
- to protect confidentiality of confidential information provided to us for a legitimate purpose;
- or
- for enforcement related activities conducted by, or on behalf of, an enforcement body, or
- otherwise to comply with law (e.g. legal professional privilege).

### ***Why we collect your personal information***

ANUSA collects a wide range of personal information in the course of its operations, for purposes that are directly related to our core functions or activities. We may collect personal information about you:

- a. because it is needed for the proper administration of ANUSA;
- b. because we need it to provide a service you have requested – such as seeking legal or student assistance or providing you with information about applying to assistance on a matter or employment purposes;
- c. because you have provided it to us – by applying for a position as an employee, by providing services to us, contacting us to discuss your own products/services with us, participating in or commenting on online forums, registering to attend an event, subscribing to our newsletter, asking us a question or making a complaint;
- d. because you provided it to an ANUSA Department or club;
- e. because you were referred to us by an ANU service;
- f. because it is related to a complaint, dispute or allegation of misconduct related to ANUSA;
- g. because we are required by law to collect it – for example because of taxation and superannuation laws.

At all times we aim to collect only the information we need for the particular function or activity we are carrying out. We may not be able to provide the assistance or services you seek if you do not provide us with personal information when we request it.

Information collected by ANUSA without consent may include information provided to ANUSA by the ANU or contractors authorised by ANU, which you have already disclosed to ANU for university related purposes, such as your name, email address and status as a student. For example such information is used to administer ANUSA elections.

### ***Collecting sensitive information***

Sometimes we may need to collect sensitive information about you, for example, if you use ANUSA's legal or student assistance services, if you make a complaint to ANUSA or about ANUSA, if you apply for employment with ANUSA, or to facilitate activities in relation to employment law or the *Work Health and Safety Act 2011 (ACT)*

### ***Collecting through websites***

ANUSA uses information technology to conduct our official business. When you look at ANUSA's websites the server may make a record of your visit and logs some or all of the following information including:

- your browser's geolocation data;
- when you visit ANUSA's website and the pages you access within the website;
- how you came to our website including
  - Organic search
  - Direct (ie inputting anusa.com.au in your browser)
  - Referral (clicked a link/button from a domain not associated with us)
  - Email (from our emails)
  - Organic social media access
- the type of browser you are using.

ANUSA uses this information for statistical purposes and for system administration tasks to maintain this service.

Entry to some of ANUSA's web services (eg: online Legal appointment booking) is restricted by user log-in protocols. We may require you to use an assigned ID to access these sites to help keep the information accessible through these sites secure from unauthorised alteration, use or disclosure, to resolve problems with the IT systems, and to keep an auditable record of who has accessed this information.

Sometimes we collect information through third party service providers, such as ANU information systems and legal booking systems. Where we use these services you will generally have an opportunity to consent to providing information through that service. Such third party service providers may have their own privacy policies which apply to handling of your personal data in transmission to ANUSA.

### ***Building access***

If you enter the ANUSA office or consult room that requires you to swipe your University ID card to gain entry, we may collect and use that information to keep an auditable record of who has had access to our locations for safety and security purposes.

### ***Social Networking Services***

We sometimes use social networking services such as Facebook, Instagram and YouTube to communicate with the public and students about our activities or achievements. If you choose to communicate with us using these services we may collect your personal information. The social networking service may also collect or handle your personal information and use it for its own purposes. These services have their own privacy practices and policies. ANUSA is unable to regulate the actions of those services. This policy does not apply to the acts or practices of those services.

### ***Email lists***

We collect your email address (and other contact details) when you apply for employment or make an enquiry with us. We only use this information to contact you for administrative purposes related to your engagement with us. We may collect email addresses for other specific purposes. For example, providing you with a specific service or enrolling you in a specific activities. We may collect personal information from you for the purposes of establishing and operating an ANUSA alumni network. If you receive notifications through newsletters, you will also have the opportunity to opt out of receiving such notifications.

If you register to attend an event, we usually collect the contact details you provide at registration to communicate with you about the event you registered for and potentially other similar events.

### ***Use and disclosure***

We use and may disclose your personal information for the purpose we collected it, and may use or disclose it for other purposes with your consent or as otherwise permitted by the Privacy Act. Generally, we will not disclose personal information about students to a student's relatives without the student's consent, except where or it is reasonable to do so in a situation of serious threat to health or safety or in other situations permitted by the law.

### ***Exemptions: Disclosure of personal information***

Sometimes we may use or disclose your personal information in circumstances where you would reasonably expect us to use or disclose it.

Your personal information may be used outside these parameters where permitted by the Privacy Act (for example if received in the course of providing legal or student services to another student or student related organisation).

Common situations in which we may use or disclose personal information include:

- in relation to certain student assistance and/or legal matters;
- to provide services to you;
- releasing information in the course of providing student services or carrying out activities of the Association or managing employment relationships within the Association;
- reporting to the Australian Tax Office about income tax matters;
- in connection with the proper administration of ANUSA, where your personal information may be included in ANUSA related information;
- where we are required or authorised by law or it is reasonable to do so in representing or advocating for the rights or welfare of individual or groups of students;
- if we are required by law to disclose the information.

We may disclose personal information to an external review body if you seek an external review of an ANUSA decision or make a complaint to an external complaint handling body. We may disclose your personal information to an external body if lawfully required to do so by them; or if proper in providing welfare, legal, advocacy services to a student or acting generally in the interests of students.

If you make a complaint or report an incident to us about another student or ANUSA staff member, in some circumstances we may be required to disclose some of your personal information to the person about whom you have made a complaint. It may be that sometimes we are unable to act on your complaint or allegation unless you consent to this kind of disclosure. We will assess and handle complaints about the conduct of Association employees and elected officials members in accordance with ANUSA's Policies and Procedures, and any applicable laws.

### ***Exemptions: Disclosure of sensitive information***

We only disclose your sensitive information for the purposes for which you gave it to us, or for directly related purposes you would reasonably expect, or if the Privacy Act allows us to disclose it, or if you agree.

### ***Exemptions: Disclosure to ANU or Third Parties***

We generally do not disclose personal information about students to the Australian National University without the student's consent. ANUSA may disclose information to the ANU in circumstances such as the following:

- where explicitly authorised by you or reasonably necessary to provide a service you have requested;
- through use of email services, software or information infrastructure provided by the ANU;
- where reasonable in carrying out a function of ANUSA such as advocating or acting on behalf of students generally or on behalf of a student to whom ANUSA is providing services or in reasonable pursuit of ANUSA's objectives;
- where it is reasonable for ANUSA to report misconduct or potential misconduct affecting ANUSA or ANUSA members to ANU;
- inclusion of your information in secure third party databases supporting service provision by ANUSA.

### ***Reporting News to the University Community***

Where ANUSA undertakes media publicity or publication of news or news releases containing personal information, it will comply with normal standards of journalist codes of ethics such as found in the MEAA Journalists Code of Ethics or the Australian Press Council Statement of Principles.

### ***Storage and security of personal information***

We take reasonable steps to protect the security of the personal information we hold from both internal and external threats through using the ANU's University Information Infrastructure and Services (IIS) and other secure third party systems (for example for legal or welfare information). Measures taken may be physical, electronic, or procedural. ANUSA employees and elected officials are advised to treat personal information with care and ensure the confidentiality of confidential information, and in accordance with this Privacy Policy and applicable laws. We may hold your personal information in secure third-party databases or in ANU provided data systems and in other communication systems used by ANUSA such as Facebook, Instagram, Slack, Sharepoint and other channels.

### ***Quality of personal information***

It is an important to us that your Personal Information is up to date. ANUSA will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

### ***Access and correction of your personal information***

You may ask to access your personal information that we hold and ask that we correct that personal information. You can ask for access or correction by contacting us at [sa.admin@anu.edu.au](mailto:sa.admin@anu.edu.au) and we will respond within 30 days. We will undertake reasonable endeavours to correct incorrect information, and provide access for this purpose, subject to any requirements of confidence and law.

ANUSA may deny access where allowed by the Privacy Act, for example where access may create a serious risk to health or safety, where providing access would be unlawful or where a request is frivolous and vexatious.

### ***Freedom of Information***

The ANUSA constitution may have provisions relating to access to information by members of the Association. Subject to obligations of confidence, information held by ANUSA may be released further to a freedom of information request under those provisions.

### ***What we do if there is a privacy breach***

A privacy breach may have occurred when an individual's personal information is subject to loss, unauthorised access, modification, disclosure or other misuse or interference. This can be caused from a cyber-security incident, accidental loss of IT equipment or hard copy documents, information handling practices or improper use of information.

An eligible (reportable) data breach arises when all three of the following criteria occur and should be reported to the relevant Privacy Commissioner by the Privacy Officer:

- a) there is unauthorised access or disclosure of personal information, or a loss of personal information that ANUSA holds;
- b) it is likely to result in serious harm to one or more individuals; and
- c) ANUSA has not been able to prevent the likely risk of serious harm with remedial action.

If a staff member, student or other member of the University community discovers or is otherwise alerted to an actual, potential or suspected privacy breach, they must notify the Privacy Officer on 0261252444 or sa.[admin@anu.edu.au](mailto:admin@anu.edu.au) as soon as practicable, and no later than 24 hours after detection.

When a breach is notified to the Privacy Officer, the following actions will be undertaken:

- a) Contain: the breach immediately to prevent compromise of personal information
- b) Assess: the risks of harm to affected individuals by investigating circumstances of the breach
- c) Notify: affected individuals if deemed appropriate in the circumstances
- d) Review: the breach and the University's response to consider action to prevent future incidents of a similar nature and improve the handling of future breaches

When a notification is made to the Privacy Officer, the individual or business area reporting the incident should take reasonable steps to contain the breach and preserve any information and records that may be required in the investigation, notification and reporting processes.

The Privacy Officer will liaise and assist the relevant and responsible business areas to:

- a) determine if a privacy breach has or may have occurred;
- b) take all reasonable steps to contain the actual or potential breach as soon as practicable;
- c) assess the severity of the actual or potential breach, the likelihood of serious harm and whether the breach is an eligible data breach that needs to be reported to a privacy regulator;
- d) investigate the scale, materiality and root cause of the incident;
- e) evaluate the risks and determine actions to rectify and mitigate the breach;
- f) develop a rectification plan; and
- g) report any confirmed breach and actions undertaken to the ANUSA Executive and ANUSA General Manager.

The Privacy Officer is responsible for notifying relevant privacy regulators as required, and will work with the relevant and responsible areas to determine and assist with:

- a) notifying any external affected organisations;
- b) taking reasonable steps to notify any affected individuals that are deemed to be 'at risk' in a timely manner; and
- c) providing advice on whether other entities such as the police, law enforcement or other regulatory bodies need to be notified.

### ***How to make a complaint***

If you wish to complain to us about how we have handled your personal information you should complain in writing. If you need help lodging a complaint, you can contact us for information. If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint.

We will tell you promptly that we have received your complaint and seek to respond to the complaint within 30 days. If you are not satisfied with our response you may ask for a review by a more senior officer within ANUSA (if that has not already happened).

Following 30 days of your complaint to us or if you are unhappy with our response you may complain to the Office of the Information Commissioner. <https://www.oaic.gov.au/>.

### ***How to contact us about privacy matters:***

You can contact us by:

- Email: [sa.admin@anu.edu.au](mailto:sa.admin@anu.edu.au)
- Phone: +61 2 6125 2444

Post:

Attention: The Privacy Officer  
The Australian National University Students Association

Level 2 Di Riddell Student Centre  
Canberra ACT 2601  
Australia

### ***Guidelines/Legislative Compliance***

The Privacy Act 1988 (Cth)

Legal Profession Act 2006 (ACT)

ANU Acceptable use of information infrastructure policy (where applicable)