Adelaide Central School of Art

Privacy Policy and Procedure

Policy Id	A009
Original Version	V1 April 2022
Current version	Approved by the Board of Governors, 31 March 2025
Scheduled review date	March 2028
Threshold Standard	7.3.3
Responsible person/s	Academic Administration Manager, Operations Manager and Chief Executive Officer
Appendix A	

---

1. Introduction

Adelaide Central School of Art Incorporated ABN 16 896 868 731 (referred to in this privacy policy as **ACSA**, **we**, **us**, **our**) respects the privacy of individuals. ACSA will be guided by the principles in the *Privacy Act 1998* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**) set out in Schedule 1 of the Act, as a framework for its privacy practices.

2. Purpose

This privacy policy describes how ACSA may collect, hold, use and disclose your personal information.

3. Scope

This policy applies to ACSA's board members, staff, students, volunteers, agents, contractors, visitors and members of the public who engage with ACSA.

4. Definitions

4.1 **Personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether it is recorded in a material form or not. Typical examples of an individual's personal information that may be held by ACSA include, but are not limited to:

- name, signature, address, phone number, email address, date of birth;
- employee record information, including tax file number and bank accounts;
- details of student enrolment and prior study at other institutions;
- photographic or other image;
- credit card details
- a government-related identifier such as an ABN.

4.2 Personal information can also include sensitive information such as:

4.2.1 information or an opinion about an individual's:

- racial or ethnic origin; or
- criminal record; or
- health information about an individual.

5. Personal information we collect and the purposes for which we use it

5.1 To conduct its activities, ACSA collects, holds, uses and discloses, personal information including (but not limited to) the following, for the purposes stated:

Personal information we collect	Purposes for information collection and use
Student name, contact details, email addresses, photographs, tax file numbers and other government related identifiers, enrolment, grades, study completion, prior studies, work placements, prizes and awards, scholarships and graduation details;	Managing student's enrolment, study progress, course delivery and completion, and providing student support and library services. The names of graduates and prize winners may be published in graduation booklets and on the ACSA website. Relevant personal information of students undertaking work placement will be provided to placement providers;
Prospective students including name, contact details, and prior studies, grades and awards;	Processing applications for entry to academic programs;
Individuals related to, or associated with, students, such as emergency contacts, medical practitioners, including name and contact details;	Providing support services to students in cases of health or other emergency;
Alumni, including name, contact details, courses completed, career details and awards;	Providing support to graduates and managing alumni activities;
Details of the lodgment and resolution of grievances and complaints by students and staff;	Processing complaints and grievances;
Donor details, including name, contact details and donation details;	Attracting and managing philanthropy and acknowledging donors publicly;
Employees, contractors, volunteers, and visitors including name, contact details, photographs, bank account details and ABN and tax file numbers;	Managing ACSA's operations, providing staff remuneration, leave, staff development and support services, and providing for statutory reporting requirements;
Job applicants, including name, contact details, qualifications and experience, referees and information resulting from ACSA's functions, e.g. assessment of applicants, communication with referees;	Recruiting and managing staff;
Individuals accessing ACSA's services, facilities and events including name and contact details, details of ACSA website usage, event registration and attendance, and sales of merchandise;	Managing ACSA's relations with the public and public events, including exhibitions and open days, student recruitment, and the sale of merchandise;

Sensitive Information	Circumstances of collection	Purpose of Collection	How it is held
Country of Birth	Student Enrolment Staff onboarding	Government Reporting / Compliance	Encrypted Database Restricted Access
Nationality	Student Enrolment Staff onboarding	Government Reporting / Compliance	Encrypted Database Restricted Access
Citizenship	Student Enrolment Staff onboarding	Government Reporting / Compliance	Encrypted Database Restricted Access
Tax File Number	Student Enrolment Staff onboarding	Government Reporting / Compliance	Encrypted Database Restricted Access
Disability / Health Information	Student Enrolment	Government Reporting / Compliance	Encrypted Database Restricted Access
Working with children information	Staff onboarding	Government Reporting / Compliance	Encrypted Database Restricted Access
Indigenous Status	Student Enrolment Staff onboarding	Government Reporting / Compliance	Encrypted Database Restricted Access
Language spoken at home	Student Enrolment	Government Reporting / Compliance	Encrypted Database Restricted Access
Previous education history	Student Enrolment Staff onboarding	Government Reporting / Compliance	Encrypted Database Restricted Access

5.2 If you fail to provide us with your personal information when requested, we may not be able to perform the contract we have or are trying to enter with you (for example, to provide you with goods or services, or assess you as an employee or prospective employee). In this case, we may have to cancel a product or service, contract or assessment you have with us, but we will inform you if this is the case at the time.

6. How we collect your personal information

6.1 ACSA will only collect personal information, including sensitive information:

6.1.1 by lawful and fair means; and

6.1.2 from the individual to whom the information relates, except where ACSA is required or authorised by law to collect the information from another person.

6.2 ACSA uses different methods to collect personal information from and about you including (but not limited to):

(a) **Directly from you**. You may give us your personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:

(i) enrol in or apply for any of our courses;

(ii) submit online or on-site forms;

(iii) subscribe to our website or join our mailing list;

(iv) submit employment applications;

(v) correspond with us using email or similar messaging technologies;

(vi) contact us via telephone or in person;

(vii) use our website, we monitor metadata arising from individuals' use of the ACSA website;

(viii) purchase our products or services;

(ix) register for or attend our events;

(x) donate to ACSA directly;

(xi) merchandise sales records; and

(b) **Third parties or publicly available sources.** We may receive personal information about you from third parties with which ACSA cooperates, including:
Givenow.com
TCSI – Tertiary Collection of Student Information
USI Registry
JobReady Plus
Formsite
Microsoft
Stripe
WoocCommerce
MYOB
MailChimp

6.3 ACSA will collect sensitive personal information only with the consent of the relevant individual or where the collection of the information is required or authorised by law.

6.4 ACSA will only collect personal information, other than sensitive personal information, if:

6.3.1 the information is reasonably necessary for, or directly related to, ACSA's functions; or

6.3.2 ACSA is required to collect the information by, or is provided with, the personal

information under law.

6.5 ACSA may collect, hold, use, or disclose personal information concerning an individual:

6.4.1 for the purpose for which the information was collected (primary purpose); or

6.4.2 for a secondary purpose if:

(a) the individual would reasonably expect ACSA to use or disclose the information for the secondary purpose; and

(b) the secondary purpose is, in the case of sensitive personal information, directly related to the primary purpose or, in relation to other personal information, is related to the primary purpose.

6.6 ACSA will provide a Privacy Statement complying with APP 5 (see Appendix A for summary) to an individual prior to, at the time of, or otherwise as soon as practicable after, collecting personal information from that individual.

6.7 Where ACSA receives unsolicited personal information and has no legal purpose for retaining that information, the information will be destroyed or de-identified.

6.8 ACSA will enable individuals to use a pseudonym or otherwise to remain anonymous except where ACSA is required by law to deal with individuals who have identified themselves, or where it is impracticable to deal with individuals who have not identified themselves or who use a pseudonym.

7. How we hold your personal information

Encrypted personal information is held by third party data storage providers. Including:

Givenow.com
TCSI – Tertiary Collection of Student Information
USI Registry
JobReady Plus
Formsite
Microsoft
Stripe
WoocCommerce
MYOB
MailChimp

8. Information retention and security

8.1 ACSA may retain personal information, such as student enrolment and course completion records and staff employment records, in accordance with its records management policy and procedures. Personal information, including sensitive information, may be held in paper or electronic records. Electronic records may be held on ACSA's electronic systems on or off campus or on third party systems within or outside Australia.

8.2 ACSA will take reasonable steps to ensure that personal information is stored securely and is protected from misuse, interference, loss or unauthorised access, modification or disclosure. However, no system is completely secure and even though we do our best to protect your Information, we cannot fully eliminate security risks and therefore cannot guarantee the security of your information.

8.3 Under applicable law we may have to keep basic information about our transactions with individuals we engage with, including contact details, identity, financial and transaction data for at least seven years after a transaction is completed. However, we may keep your personal information for longer where we still need it for the purpose it was collected for.

8.4 Access to personal information will be provided to ACSA's board members, employees, contractors, volunteers, visitors and students only as is necessary for them to undertake their respective functions at ACSA.

8.5 ACSA will take reasonable steps to destroy or de-identify personal information once it is no longer required for a primary or secondary purpose, except where ACSA is required by law to retain the information.

9. Disclosures of your personal information

9.1 ACSA will take reasonable steps to ensure that personal information it collects, holds, uses or discloses is accurate and complete, and will encourage relevant individuals to notify ACSA of any changes to their personal information that is held by ACSA.

9.2 ACSA may disclose personal information:

- with the consent of the relevant individual;
- as necessary for the primary purpose for which the information was collected;
- for a secondary purpose;
- to enable the provision of services or facilities to the relevant individual; or
- as required by law.

9.3 ACSA will not use or disclose a government related identifier unless authorised by law.

9.4 ACSA may collect and use personal information (other than sensitive information) provided by an individual or accessed through the ACSA website, including by using tools such as cookies, and use this information for marketing and the notification of events. ACSA will enable individuals to opt out of receiving direct marketing communications. ACSA will only use sensitive information for direct marketing or notification with the prior consent of the individual to whom the information relates.

9.5 Where an individual becomes aware of a breach of privacy or loss or misuse of personal information held by or disclosed by ACSA or its board members, staff, students, contractors, visitors or agents, or any other breach of this policy, the individual should report the matter as soon as practicable to the Privacy Officer.

10. Rights of Individuals

10.1 An individual may request access to information held by ACSA about the individual by contacting the Privacy Officer. Access to personal information will be provided to the individual unless there is a legal reason for ACSA not to provide that access.

10.2 An individual may contact the Privacy Officer about:

7.2.1 correction of personal information;

7.2.2 a question about the collection, storage, use or disclosure of personal information;

7.2.3 allegations of a breach of this policy.

10.3 The Privacy Officer can be contacted by contacting ACSA.

11. Responsibilities

11.1 The Privacy Officer means the Chief Executive Officer of ACSA or a nominated delegate.

11.2 The Privacy Officer will be guided by the Privacy Act, the APPs and any other Commonwealth or South Australian legislation relating to privacy.

11.3 All ACSA staff are responsible for working in accordance with this policy.

12. Contact Details

Address: Kaurna Country, Glenside Cultural Precinct, 7 Mulberry Road
Glenside SA 5065

Telephone Number: (08) 8299 7300

13. Related Documents

ACSA Privacy Statement
ACSA Academic Staff Qualifications and Equivalency Policy
ACSA Records Management Policy and Procedure
Australian Privacy Principles

Australian Privacy Principles Guidelines
Privacy Act 1988 (Cth)

Privacy for not-for-profits, including charities

14. Review

This policy will be reviewed at least once in every 3 year period commencing on the date of approval of this policy.

Appendix A:

Australian Government
Office of the Australian Information Commissioner

Australian Privacy Principles

A summary for APP entities.

APP 01 Open and transparent management of personal information
Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

APP 02 Anonymity and pseudonymity
Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

APP 03 Collection of solicited personal information
Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

APP 04 Dealing with unsolicited personal information
Outlines how APP entities must deal with unsolicited personal information.

APP 05 Notification of the collection of personal information
Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

APP 06 Use or disclosure of personal information
Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

APP 07 Direct marketing
An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

APP 08 Cross-border disclosure of personal information
Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

APP 09 Adoption, use or disclosure of government related identifiers
Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

APP 10 Quality of personal information
An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

APP 11 Security of personal information
An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

APP 12 Access to personal information
Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

APP 13 Correction of personal information
Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.