

# Privacy Policy

## SECTION 1 - PREAMBLE

1. This Policy was approved by the Deakin Residential Services Pty Ltd Chief Executive Officer.

## SECTION 2 - PURPOSE

2. This Policy outlines Deakin Residential Services Pty Ltd ABN 22 145 979 344 (DRS) obligations for and commitment to the responsible management of personal information held about its staff, students and individuals with whom it interacts.

## SECTION 3 - SCOPE

3. This Policy applies throughout DRS.

## SECTION 4: - POLICY

DRS respects the privacy of individuals with whom it transacts. This policy explains how DRS manages personal information that it collects in the course of providing its services.

### About DRS

The primary function of DRS is to provide residential accommodation and supporting services on Deakin University (DU) campuses in Geelong, Burwood, Waurin Ponds and Warrnambool. Accommodation is provided primarily to students of DU and Deakin College (DC), however members of the public who qualify under the National Rental Affordability Scheme (NRAS) are also eligible to reside in accommodation provided by DRS.

DRS is wholly owned by DU .

### 1. Compliance

DRS complies with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth).

It also complies with the *Health Records Act 2001* (Vic) to the extent that it collects Health Information.<sup>1</sup>

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<sup>1</sup> Health Information as defined in the *Health Records Act 2001* (Vic) means:

## 2. What is Personal information

Personal information is defined in the Privacy Act as any information (including an opinion), whether true or not, and whether recorded in a material form or not, about an individual who is either identified by the information or could be reasonably identifiable.

## 3. How DRS collects Personal Information

### Collection

DRS collects personal information where necessary for or directly related to its functions and activities or where required by law.

DRS does not collect sensitive personal information<sup>2</sup> unless it is necessary for the provision of its services or required by law.

DRS collects personal information lawfully and fairly. It collects personal information directly from the individual, where reasonable and practical to do so.

DRS may collect information from DU, in the case of residents or prospective residents enrolled at DU and from DC in the case of residents or prospective residents enrolled at DC.

DRS commonly collects personal information

- (a) on hard copy or electronic forms;
- (b) in written or email correspondence;
- (c) by telephone
- (d) in person.

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- a) information or an opinion about:
    - i) the physical, mental or psychological health (at any time) of an individual; or
    - ii) a disability (at any time) of an individual; or
    - iii) an individual's expressed wishes about the future provision of health services to him or her; or
    - iv) a health service provided, or to be provided, to an individual — that is also personal information; or
  - b) other personal information collected to provide, or in providing, a health service; or
  - c) other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
  - d) other personal information that is genetic information about an individual in a form which is or could be predictive of the health (at any time) of the individual or of any of his or her descendants.

<sup>2</sup> Sensitive Information is information or opinion about and individuals:

- racial or ethnic origin;
- political opinions;
- membership of a political association, professional or trade association or trade union;
- religious beliefs or affiliations or philosophical beliefs;
- sexual preferences or practices;
- criminal record; or
- health, genetic information or disability

## **Unsolicited Information**

If an individual or a third party provides information that DRS did not request DRS may keep and use that information if it is information that it could otherwise have lawfully collected and used. In all other cases it will de-identify, delete or securely destroy the information.

## **Anonymity and Pseudonymity**

DRS will provide individuals with the option of not identifying themselves or of using a pseudonym where it is practicable to do so. Individuals should anticipate that if they are applying for residence or are living in residence, DRS will be unable to provide services to them if they do not provide their personal information.

## **4. Personal Information collected**

The type of personal information DRS collects and holds about individuals depends on the nature of their interactions with DRS. DRS typically collects information from applicants for residence in DRS managed accommodation, student and non-student residents, including short-stay residents, who are staying in DRS-managed accommodation, and members of the public making inquiries.

The personal information collected may include, as appropriate to the interaction: name, date of birth, gender, contact details, emergency contacts, banking details, proposed or current enrolment, course of study, academic outcomes, and photograph.

Information that assists DRS in providing accommodation and services to meet individual needs may also be collected, including accommodation preferences, dietary requirements, requirements for special needs and disability support, and other information relevant to living in DRS-operated accommodation.

## **5. Use and Disclosure**

### **Use**

DRS uses the information it collects to manage all aspects of its relationship with an individual. In the case of a prospective or successful applicant for residence in DRS-operated accommodation, this includes:

- (a) to process applications for residence;
- (b) to assess continuing eligibility to reside in DRS-operated accommodation;
- (c) to enable residents to access underlying business and support structures available to residents;
- (d) managing and collecting fees and charges relevant to staying in residence;
- (e) to communicate with residents, whether current, past or prospective;
- (f) to provide residents with access to and advice about available services and resources;
- (g) to compile statistics, to analyse and predict trends, and to support planning and quality assessment activities;

- (h) for marketing and fundraising;
- (i) to invite participation in surveys;
- (j) to investigate incidents and complaints;
- (k) to provide information about events provided or sponsored by DRS, Deakin University or Deakin College;
- (l) to provide residents or their nominated contract with appropriate advice and assistance in the event of any emergency;
- (m) in the case of Deakin University students, to investigate and report to the University on incidents relating to general or academic misconduct, as defined in Deakin's statutes and regulations;
- (n) in the case of Deakin College students, to investigate and report to Deakin College on incidents relating to misconduct; and
- (o) to improve the student experience and overall wellbeing at DU and its residences.

DRS may either provide services itself or engage contractors to do so. DRS ensures that contractors are obligated to safeguard personal information and to use it only to the extent necessary for the provision of the contracted services.

### **Disclosure**

As a wholly owned entity of Deakin University DRS shares information with and collects information from the University. For example, DRS uses the business and IT infrastructure of Deakin University. It additionally provides personal information to Deakin College for purposes of student support.

DRS cooperates with Deakin University's "Safer Communities" initiative. DRS discloses information to and seeks assistance from the Safer Communities office in appropriate circumstances.

DRS may disclose personal information if

- (o) it reasonably believes that the disclosure is necessary
  - (i) to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety;
  - (ii) to assist a law enforcement body; or
- (p) the disclosure is required or authorised under an order of a court or tribunal, or under Australian law, including the Privacy Act.

### **6. Security and Storage of Personal Information**

DRS takes all reasonable steps to protect the personal information that it holds from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

DRS stores personal information on password-protected computers that are part of the Deakin University IT infrastructure.

## **7. Direct Marketing**

DRS may use personal information provided by individuals to send information about services or events provided or sponsored by DRS or by Deakin University.

Individuals may opt out of receiving information

(a) by following unsubscribe links in an electronic communication; or

(b) by contacting the Privacy Officer, Deakin Residential Services at 1 Gheringhap Street, Geelong 3220 or [drsprivacy@deakin.edu.au](mailto:drsprivacy@deakin.edu.au)

(c) by contacting Deakin University's Marketing Division at [unsubscribe@deakin.edu.au](mailto:unsubscribe@deakin.edu.au)

## **8. Accuracy and Correction**

DRS will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. Individuals may review and amend their personal information by contacting the Privacy Officer at [drsprivacy@deakin.edu.au](mailto:drsprivacy@deakin.edu.au) or 03 5227 2895. Current residents may amend their own details by logging into the Residential Portal.

An individual may request that DRS amend personal information it holds if they believe it is incorrect, incomplete or inaccurate. DRS will consider the requested amendment and, if it does not agree that it should be amended it will a note to the record noting the individual disagrees with it.

## **9. Right of Access**

Individuals may request access to their personal information held by DRS. Requests for access should be made in writing to the Privacy Officer, Deakin Residential Services,

1 Gheringhap Street, Geelong 3220 or [drsprivacy@deakin.edu.au](mailto:drsprivacy@deakin.edu.au).

DRS may charge a fee for its reasonable costs of locating and making personal information available in the form requested. DRS does not charge a fee for requesting access.

It is not always possible to grant access to personal information held by DRS. For example, access may interfere with the privacy of other people or may breach an obligation of confidentiality. If that is the case, DRS will advise you in writing of the reason it cannot grant access.

## **10. Complaints**

An individual who believes that DRS has interfered with their privacy contrary to this Privacy Policy or applicable legislation, including the Australian Privacy Principles, should lodge a complaint with the Privacy Officer, Deakin Residential Services 1 Gheringhap Street, Geelong 3220 or [drsprivacy@deakin.edu.au](mailto:drsprivacy@deakin.edu.au).

A complaint should be made in writing and within a reasonable time from when a complainant first became aware of their concerns with their privacy or this policy. DRS may seek assistance from Deakin University in investigating and responding to a complaint.

#### 11. Disclosure to overseas Recipients

DRS and Deakin store personal information they collect in Victoria. DRS and Deakin, however reserve the right allow their service providers to access personal information from outside Victoria and outside Australia. Where this occurs, contracts have been put in place with those providers to ensure:

- (a) any personal information is provided by Deakin or DRS only for the performance of the contracted service;
- (b) the service provider will have in place administrative and technical measures to keep the personal information secure and protect the personal information from unauthorised access, use, disclosure, modification or deletion; and
- (c) personal information is disclosed only to the extent required by a provider to provide a contracted service.

#### 12. Changes to this Privacy Policy

DRS reserves the right to amend its Privacy Policy from time to time. The most recent version of the Privacy Policy will be available at <http://www.deakin.edu.au/life-at-deakin/> accommodation.

#### ASSOCIATED DOCUMENTS:

N/A

POLICY DETAIL	
<b>Name of policy</b>	Privacy Policy
<b>Version</b>	Current
<b>Category</b>	Staff
<b>Date for Next Review</b>	<i>Policies and procedures are reviewed annually in November.</i>

<b>Authorised by</b>	<p>X</p> <hr/> <p>Vincent Wilson Chief Executive Officer DRS</p>
<b>Owner</b>	DRS Business Manager