

1. Purpose

1.1 The purpose of this policy is to:

- assist the Council understand its obligations with regard to compliance with the *Privacy Act 1988*, the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, *Australian Privacy Principles (APPs)* and with any subsequent amendments to the Act.
- assist CAUDIT staff to ensure adequate operational controls are exercised regarding privacy of personal information and records.

2. Application

2.1 This Policy is applicable to the CAUDIT Executive Committee, sub-Committees and CAUDIT staff and volunteers.

3. Exceptions

None.

4. Definitions

Executive Committee	Those individuals who are members of the CAUDIT Executive Committee, including all elected positions, ex officio positions, and any appointed positions.
Sub-Committees	Those individuals who are members of a CAUDIT Committee which reports to the Executive Committee, including all elected positions, ex officio positions, and any appointed positions.
CAUDIT staff	Those individuals who are employed by CAUDIT, either directly or via a separate legal entity.
The Act	The Privacy Act 1988 (No. 119, 1989 as amended)
The Amendment	the Privacy Amendment (Enhancing Privacy Protection) Act 2012
APPs	Those legislated Australian Privacy Principles contained in schedule 1 of the Privacy Act 1988.
Volunteers	Those individuals appointed by CAUDIT to act on its behalf or carry out work on behalf of CAUDIT and/or its members (paid or unpaid).

5. Policy Statement

5.1 CAUDIT, CAUDIT employees and volunteers acting on behalf of CAUDIT will respect the confidentiality of personal information held and use it only in accordance with the law. Individuals may have access to their personal information if they request this.

6. Key Points

6.1 As a small Not for Profit Association with annual turnover of less than \$3m, CAUDIT's observance of the Act is voluntary.



6.2 In observing the Act, CAUDIT will:

- Manage personal information in an open and transparent way while complying with the Act and Australian Privacy Principles
- Make this policy available free of charge upon request
- Provide for anonymity and pseudonymity
- not collect personal information unless the information is reasonably necessary for one or more of CAUDIT's functions or activities
- not disclose personal information unless approval has been given by the person concerned and the information is reasonably necessary for one or more of CAUDIT's functions or activities

7. How CAUDIT supports and observes the Act

7.1 CAUDIT addresses its obligations under the Act and Amendments by identifying:

7.1.1 The kinds of personal information that CAUDIT collects and holds and does not hold.

Information collected and held:

- the names, titles, role titles, telephone numbers, email and organisation address of Member Representatives and that of their personal assistants
- the names, titles, role titles, telephone numbers, email and organisation address of participants in CAUDIT Professional Development Programs and Communities of Practice.
- the names, titles, role titles, telephone numbers, email and organisation address of vendor representatives who have engaged with CAUDIT
- contact details for the purposes of issuing and paying invoices

Information not collected or held:

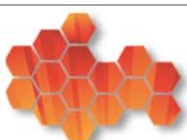
- Sensitive personal information

7.1.2 How CAUDIT collects and holds personal information:

CAUDIT may collect personal information that is publicly available; through direct request to the individual concerned or their Member organisation; and through their participation in CAUDIT meetings, events and social media services that we provide. Individuals can self-subscribe to our Community of Practice and newsletter mailing lists. Information is held in electronic format via the CAUDIT website CMS, staff MS Outlook accounts and secure spreadsheets.

Information on vendor representatives and other relevant member staff is held in the CAUDIT website CMS, staff MS Outlook accounts and in the CAUDIT file server which is Dropbox. (Dropbox is certified ISO27001 (Security) and ISO27018 (Privacy and Data Protection) compliant.)

Secure technology is used for any on-line financial transactions undertaken directly by CAUDIT. Every effort is made to ensure any authorised third party adheres to this requirement.



Individuals can request they be removed from our social media and newsletter lists.

7.1.3 The purposes for which CAUDIT collects, holds, uses and discloses personal information:

Information is held in order to fulfil our services requirements in negotiating collective procurement agreements, benchmarking, professional development programs, Communities of Practice, working groups, projects and formal meetings and events.

CAUDIT may contact individuals in order to promote CAUDIT meetings, events (such as the bi-ennial conference) and professional development programs and webinars. Individuals can request not to receive this information.

7.1.4 How an individual may access personal information about the individual that is held by CAUDIT and seek the correction of such information:

CAUDIT will take reasonable steps to ensure personal information held is accurate and protected from misuse, interference, loss, unauthorised access, modification or disclosure. Information no longer required in order to maintain CAUDIT's activities and services will be anonymised or deleted.

Individuals may access their personal information and seek corrections by contacting CAUDIT at caudit@caudit.edu.au or on +61 2 62227575.

Requests will be reviewed by the Manager Online Engagement & Administration and a response provided within a reasonable period after the request is made.

7.1.5 Whether CAUDIT is likely to disclose personal information to overseas recipients:

CAUDIT will not disclose personal information to overseas recipients without the prior approval of the individual concerned.

7.1.6 If CAUDIT is likely to disclose personal information to overseas recipients—the countries in which such recipients are likely to be located if it is practicable to specify those countries in the policy:

Countries concerned are those in which members of the Coalition of Higher Education Associations (CHEITA) reside.

8. Handling of complaints

8.1 An individual may complain about a breach of the APPs, or a registered APP code by CAUDIT by contacting the CEO in writing to caudit@caudit.edu.au.

9. Other related policies

9.1 CAUDIT holds other policies that may be used in support and connection with this policy such as:

- CAUDIT Copyright Policy

Approved:

Date for Review:

Access:

CAUDIT Executive Committee – 5 September 2017

2023

Public

