

# STUDENT PRIVACY POLICY 2021

The Joint Venture Board of the University of Sydney Foundation Program Pty Limited (USFP), as the governing authority of the University of Sydney Preparation Programs, by resolution adopts the following policy.

Dated:

Last amended:

Signature:

Position:

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## PART 1 – STUDENT PRIVACY POLICY

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### 1 Name of policy

This is the Student Privacy Policy 2021.

### 2 Commencement

This policy commences the day after the day on which it is registered.

### 3 Policy is binding

Except to the extent that a contrary intention is expressed, this policy binds The University of Sydney Foundation Program Pty Limited (CRICOS Provider Code: 00026A), staff, students and affiliates.

## 4 Overview

- (1) This policy explains how USFP fairly and lawfully manages students' personal information while carrying out its functions, and students' rights in relation to that personal information.
- (2) USFP is a joint venture company, owned by Navitas Australia trading as Taylors College Sydney and the University of Sydney. Navitas Australia trading as Taylors College Sydney operates the University of Sydney Preparation Programs and manages students' personal information on behalf of USFP. Taylors College Sydney discloses students' personal information (including sensitive information) to USFP for the purpose of business administration.

## 5 Application

This policy applies to intending students, past students and students currently enrolled in the USPPs delivered on behalf of the University of Sydney by Navitas Australia Pty Limited (CRICOS Provider Code: 01682E) trading as Taylors College Sydney (the College). This policy is implemented by staff and affiliates of the College.

## 6 Definitions

<b>Affiliates</b>	means consultants and contractors to the College; members of the Board of USFP; members of College committees; and any other persons appointed or engaged by USFP to perform duties or functions on its behalf.
<b>The College</b>	means Taylors College Sydney, including its staff, affiliates and contractors.
<b>Personal information</b>	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information is recorded or not. It does not include anonymous information where the identity has been removed.
<b>Sensitive information</b>	means personal information about an individual's: <ul style="list-style-type: none"> <li>• racial or ethnic origin</li> <li>• political opinions</li> <li>• membership of a political association</li> <li>• religious beliefs or affiliations</li> <li>• philosophical beliefs</li> <li>• membership of a professional or trade association/union</li> <li>• sexual orientation or practices,</li> <li>• criminal record, or</li> <li>• health, genetic or biometric information.</li> </ul>
<b>Student</b>	means a person who is currently, was previously or is intending to be an enrolled student in a University of Sydney Preparation Program.
<b>University of Sydney Preparation Programs (USPP)</b>	means the non-award pathway programs offered by the University of Sydney and delivered by Navitas Australia trading as Taylors College Sydney. They include the University of Sydney Foundation Program and the High Achievers Preparation Program.

## **7 General principles**

- (1) USFP only collects personal information from Navitas Australia. Navitas Australia maintains and holds the USFP business records, including personal information.
- (2) USFP collects the types of personal information described in section 4.1 of Taylors College Student Privacy Policy and Navitas Website Privacy Policy.
- (3) USFP collects, holds, uses and discloses personal information for the purpose of business administration. As the USPPs are pathway courses to the University of Sydney, USFP will disclose personal information (including sensitive information) to the University of Sydney.
- (4) Students may follow the procedure in section 5 of the Taylors College Student Privacy Policy to access and correct their personal information.
- (5) Students may follow the procedure in section 7 of the Taylors College Student Privacy Policy to make a complaint about a breach of privacy.
- (6) Personal information may be stored outside of Australia through third party service providers (including cloud computing service providers), in the regions and countries described in section 4.6 of the Taylors College Student Privacy Policy.
- (7) USFP will comply with the notifiable data breaches scheme established by the *Privacy Act 1998* (Cth).
- (8) Where applicable, USFP will comply with the requirements of the European Union General Data Protection Regulation 2016/679 (GDPR).

## **8 Publication of and changes to this policy**

This Policy will be made available to students by publication on the College website. Students give informed consent for their personal information to be collected, held, used and disclosed as set out in this Policy when accepting the student enrolment terms and conditions. USFP may update this Policy from time to time.

## **9 Records Management**

Records in association with this policy will be kept in accordance with the USPP Records Management Policy and Procedures. Confidential documents related to the implementation of the policy will be maintained according to relevant privacy requirements.

## **10 Rescissions and replacements**

This document replaces the following, which are rescinded as from the date of commencement of this document:

Nil

## NOTES

### Student Privacy Policy and Procedures

- Date adopted: [This is the date on which the policy is formally signed]
- Date registered: [This is inserted by the Policy Management Unit]
- Date commenced: [This is the date on which the policy will commence, suggest at least two weeks from date of adoption/approval. To align with intake]
- Administrator: [List the position title of the most senior person responsible for the day to day operation of the policy]
- Review date: At least once every 5 years from the date of commencement.

Rescinded documents: Not applicable

Related documents:

- (1) [Australian Privacy Principles](#)
- (2) *Corporations Act 2001 (Cth)*
- (3) *Education Services for Overseas Students (ESOS) Act 2000 (Cth)*
- (4) *Education Services for Overseas Students Regulations 2019 (Cth)*
- (5) *Privacy Act 1988 (Cth)*
- (6) National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code)
- (7) National Standards for Foundation Programs
- (8) USPP Admissions Policy and Procedures
- (9) Records Management Policy and Procedures
- (10) Student Enrolment Terms and Conditions
- (11) Taylors College Student Privacy Policy
- (12) Navitas Website Privacy Policy