

STU39 PRIVACY POLICY AND PROCEDURE

Department	Operations
Approval Authority	Board of Directors
Responsible Officer	Operations Director
Effective Date for use	1 October 2026
Date of next review	September 2029 (3 years from approval date)

1. Purpose

This Policy and Procedure establishes the principles, responsibilities and processes for the lawful, fair, transparent and secure collection, use, disclosure, storage, access, retention and disposal of personal information by TITAN HIGHER EDUCATION (TITAN/THE).

The Policy and Procedure ensures that TITAN protects the privacy of students, prospective students, staff, contractors, education agents, partners and other individuals whose personal information is collected or held by Titan. It supports compliance with the *Privacy Act 1988 (Cth)*, the *Australian Privacy Principles (APPs)*, the *Higher Education Support Act 2003 (Cth)*, the *Higher Education Standards Framework (Threshold Standards) 2021, as amended*, and other applicable Commonwealth and State or Territory legislation.

This Policy and Procedure also aims to:

- promote transparency and accountability in the handling of personal information;
- protect individuals from the misuse, interference, loss, unauthorised access, modification or disclosure of personal information;
- support effective information governance, records management and cybersecurity practices;
- ensure appropriate management of privacy complaints and eligible data breaches;
- facilitate TITAN's regulatory, reporting and record-keeping obligations; and
- foster a culture of privacy awareness and continuous improvement across all TITAN operations.

2. Scope

This Policy and Procedure applies to:

- all TITAN HIGHER EDUCATION (TITAN/THE) staff, students, prospective students, contractors, consultants, education agents, volunteers and third-party service providers who collect, access, use, disclose or manage personal information on behalf of Titan;
- all personal information collected or held by TITAN in any format, including paper-based records, electronic records and information stored or processed through third-party systems and cloud-based services, in connection with TITAN's educational, administrative, regulatory and business activities.

3. Policy Principles

TITAN is committed to ensuring that:

- 3.1 Personal information will only be collected where it is reasonably necessary for TITAN's functions, activities, educational services, legal obligations, or other lawful purposes.
- 3.2 Personal information will be collected by lawful, fair, transparent and non-intrusive means.
- 3.3 Individuals will be informed of the purpose of collection, how their information will be used and disclosed, and the rights available to them regarding access, correction and complaints.
- 3.4 Sensitive information will only be collected, used or disclosed with consent or where otherwise authorised or required by law.
- 3.5 Personal information will only be used or disclosed for the primary purpose for which it was collected, a directly related secondary purpose that an individual would reasonably expect, with consent, or where authorised or required by law.
- 3.6 TITAN may collect, use and disclose personal information to fulfil its obligations under the *Higher Education Support Act 2003 (Cth)*, TCSI reporting requirements, Commonwealth assistance administration requirements, regulatory reporting obligations and other applicable legislation.
 - Individuals may request access to, and correction of, their personal information, subject to any lawful exceptions.
 - TITAN will take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.
 - TITAN will take reasonable steps to ensure that personal information is accurate, up to date, complete, relevant and not misleading before it is used or disclosed.
 - Personal information will be protected through appropriate administrative, technical and physical security measures designed to prevent misuse, interference, loss, unauthorised access, modification or disclosure.
 - Where personal information is disclosed to overseas recipients, TITAN will take reasonable steps to ensure that such recipients handle personal information in accordance with applicable privacy obligations.
 - Personal information will be retained, archived and disposed of in accordance with legislative requirements, regulatory obligations, approved retention schedules and TITAN's **Records and Data Management Policy and Procedure**.
 - TITAN will take reasonable steps to securely destroy or de-identify personal information when it is no longer required,
 - Individuals may lodge a complaint regarding the handling of their personal information, and all complaints will be managed fairly, confidentially and in a timely manner.
 - TITAN will maintain effective privacy governance arrangements, provide appropriate staff training, and promote a culture of privacy awareness and accountability.
 - TITAN will adopt a privacy-by-design approach when implementing new systems, technologies, processes or third-party arrangements involving personal information.
 - Actual or suspected privacy breaches will be managed promptly and, where required, reported in accordance with the *Privacy Act 1988 (Cth)* and the Notifiable Data Breaches Scheme.

4. Policy Statements

4.1 Lawful and Transparent Information Management

- TITAN will collect, hold, use and disclose personal information lawfully, fairly and transparently, and only where reasonably necessary to support its educational, administrative, regulatory and business functions or as otherwise authorised or required by law.

4.2 Purpose Limitation and Consent

- Personal information will only be used or disclosed for the purpose for which it was collected, a directly related secondary purpose that an individual would reasonably expect, with the individual's consent, or where authorised or required by law.

4.3 Protection of Personal Information

- TITAN will implement appropriate administrative, technical and physical safeguards to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

4.4 Accuracy and Individual Rights

- TITAN will take reasonable steps to ensure that personal information is accurate, complete and up to date, and will provide individuals with access to, and correction of, their personal information in accordance with legislative requirements.

4.5 Regulatory Compliance and Information Sharing

- TITAN may collect, use and disclose personal information to meet its obligations under the *Privacy Act 1988 (Cth)*, the *Higher Education Support Act 2003 (Cth)*, Tertiary Collection of Student Information (TCSI) reporting requirements, the *Higher Education Standards Framework (Threshold Standards) 2021*, and other applicable legislation.

4.6 Secure Storage and Retention

- Personal information will be securely stored, retained and disposed of in accordance with legislative requirements, approved records retention schedules and TITAN's ***Records and Data Management Policy and Procedure***.

4.7 Privacy Governance and Breach Management

- TITAN will maintain effective privacy governance arrangements, manage privacy complaints and data breaches promptly and appropriately, and comply with applicable legislative notification requirements.

4.8 Education, Accountability and Continuous Improvement

- TITAN will promote a culture of privacy awareness by providing appropriate training, clearly defining responsibilities for handling personal information, and regularly reviewing its privacy management practices to ensure ongoing legislative compliance and continuous improvement.

5. Procedures

5.1 Collection of Personal Information

- 5.1.1 TITAN will collect personal information only where reasonably necessary for its educational, administrative, regulatory and business functions or as required by law, in accordance with the *Australian Privacy Principles (APPs)*.

5.1.2 Personal information may be collected for activities including:

- student admissions, enrolment and progression;
- administration of fees, scholarships and Commonwealth assistance;
- staff recruitment and employment administration;
- provision of student support and wellbeing services;
- complaints, grievances, appeals and misconduct investigations;
- quality assurance, surveys and continuous improvement activities;
- graduation, certification and testamur verification;
- events, marketing and student engagement activities; and
- compliance with legislative, regulatory and reporting obligations.

5.1.3 Personal information may include identity, contact, enrolment, academic, financial, USI, HELP, TCSI, visa, wellbeing, accessibility, emergency contact, digital activity and other information required for higher education administration.

5.1.4 Personal information will normally be collected directly from the individual unless authorised or otherwise permitted by law.

5.1.5 Collection methods include forms, interviews, online systems, LMS, websites, CCTV, access control systems and correspondence and third-party verification systems such as identity or payment gateways.

5.2 Privacy Collection Notices

5.2.1 TITAN will provide a **Privacy Collection Notice** before or at the time of collection explaining the purpose of collection, legal authority where applicable, consequences of not providing information, intended disclosures, overseas disclosures, access and correction rights, and complaint processes.

5.2.2 Consent will be voluntary, informed, current, specific and capable of withdrawal where consent is the basis for processing.

5.2.3 Privacy Collection Notices will reference the **TITAN Privacy Statement** available on the TITAN website for transparency and accessibility.

5.3 Storage, Security and Information Management

5.3.1 Personal information will be stored securely in approved recordkeeping systems in accordance with the **Records and Data Management Policy and Procedure**.

5.3.2 Personal information will be classified and handled in accordance with TITAN's **Records and Data Management Policy and Procedure** and Information Security requirements, with security controls applied proportionate to the sensitivity and risk profile of the information.

5.3.3 TITAN will implement proportionate administrative, physical and technical safeguards including role-based access, encryption where appropriate, multi-factor authentication, backups, monitoring, vulnerability management and staff training.

- All staff, contractors and relevant third parties will complete privacy and information security awareness training on commencement and at least annually thereafter.
- Training will address:
 - appropriate handling of personal information;
 - identity verification practices;

- management of confidential records;
- cyber security awareness;
- recognising and reporting privacy breaches; and
- obligations under this Policy and Procedure.

5.3.4 Periodic security audits and access reviews will be conducted to ensure ongoing compliance and risk mitigation.

5.4 Privacy Impact Assessments (PIA)

5.4.1 TITAN will undertake a Privacy Impact Assessment (PIA) where new projects, systems, technologies, artificial intelligence solutions, major business process changes or third-party arrangements may significantly affect the handling of personal information.

5.4.2 Recommendations arising from a PIA will be considered before implementation.

5.4.3 PIAs will be coordinated by the Privacy Officer.

5.5 Third-Party Service Providers

5.5.1 Third parties processing personal information on behalf of TITAN must be subject to appropriate contractual privacy, confidentiality, security and breach notification obligations.

5.5.2 Cloud providers will be subject to due diligence and ongoing oversight.

5.5.3 All third-party agreements will include data processing clauses consistent with [APP 8](#) and [APP 11](#) requirements.

5.6 Use of Personal Information

5.6.1 Personal information will only be used for the primary purpose of collection, directly related secondary purposes reasonably expected by the individual, with consent, or where authorised or required by law.

5.6.2 De-identified information will be used where practicable.

- Where surveys, feedback instruments or quality assurance activities are undertaken, TITAN will provide opportunities for participants to remain anonymous where practicable and will use de-identified information for reporting and analysis wherever possible.

5.6.3 Internal approval workflows will be maintained for secondary uses and disclosures to ensure accountability.

5.7 Disclosure of Personal Information

5.7.1 Disclosure will occur only with consent or where authorised or required by law, including HESA, TCSI, TEQSA and other regulatory obligations.

5.7.2 Disclosure requests should be documented and disclosure records maintained.

5.7.3 An internal approval process will be followed for disclosures where required. A disclosure register will be maintained recording the date, recipient, purpose, legal authority (if applicable), and information disclosed for audit and compliance purposes.

5.8 Overseas Disclosure

5.8.1 Before overseas disclosure, TITAN will take reasonable steps to ensure recipients provide privacy protections consistent with Australian law.

5.8.2 A register of overseas disclosures will be maintained and reviewed annually.

5.9 Access and Correction

5.9.1 Individuals may request access to and correction of their personal information subject to legislative exceptions.

5.9.2 Requests will be verified and processed within a reasonable period.

5.9.3 All requests will be coordinated by the Privacy Officer to ensure consistency and compliance.

5.10 Retention and Disposal

5.10.1 Records will be retained in accordance with legislative and records retention requirements.

5.10.2 Information no longer required will be securely destroyed or de-identified.

5.10.3 Secure disposal certification or documented destruction records will be maintained for all information disposal activities, including destruction undertaken by third-party service providers.

5.11 Data Breach Management

5.11.1 All suspected privacy breaches must be reported immediately to the Privacy Officer.

5.11.2 TITAN will assess incidents, comply with the Notifiable Data Breaches Scheme where applicable, notify affected individuals and the OAIC where required, and maintain a breach register.

5.12 Direct Marketing and Communications

5.12.1 Personal information will not be used for direct marketing except as permitted by law or with consent.

5.13 Artificial Intelligence and Automated Decision-Making

5.13.1 AI-enabled processing involving personal information will be subject to human oversight, privacy safeguards and risk assessment.

5.13.2 Staff privacy complaints may be managed in accordance with the Human Resources Framework. Student privacy complaints may be managed through the ***Grievances Policy and Procedure***, where appropriate.

5.13.3 Privacy enquiries, access requests, correction requests and complaints should be directed to the Privacy Officer at privacy@titanhe.edu.au

5.14 Complaints

5.14.1 Privacy complaints will be managed promptly, fairly and confidentially. Individuals dissatisfied with TITAN's response will be advised of their right to complain to the OAIC.

5.14.2 Complaint outcomes will be logged and reviewed to identify systemic issues and improvement opportunities.

6. Roles and Responsibilities

6.1 Board of Directors are responsible for:

- privacy governance and risk.

6.2 Operations Director (as Privacy Officer), is responsible for:

- administering privacy compliance, breach management, access and correction requests, privacy complaints, Privacy Impact Assessments, privacy advice, training and regulatory liaison where required.
- 6.3 The Quality and Compliance Manager is responsible for:
- monitoring implementation and records.
- 6.4 Information Technology is responsible for:
- implementing, maintaining and enhancing technical security controls.
- 6.5 Staff are responsible for:
- protecting personal information;
 - completing training; and
 - reporting suspected breaches.

7. Definitions

Definitions for key terms are presented in the Glossary of Terms which may be accessed on the TITAN website.

8. Relevant Legislation, Guides, and/or Websites

8.1 Legislation:

- [Education Services for Overseas Students Act 2000](#) (accessed July 2026)
- [Fair Work Act 2009 \(Cth\)](#) (accessed July 2026)
- [Higher Education Standards Framework \(Threshold Standards\) 2021](#), as amended (accessed July 2026)
- [Higher Education Support Act 2003 \(Cth\)](#) (accessed July 2026)
- [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) (accessed July 2026)
- [Migration Act 1958 \(Cth\)](#) (accessed July 2026)
- [Privacy Act 1988 \(Cth\)](#) (accessed July 2026)
- [Student Identifiers Act 2014 \(Cth\)](#) (accessed July 2026)
- [Tertiary Education and Quality Standards Agency Act 2011](#) (accessed July 2026)

8.2 Websites

- [Office of the Australian Information Commissioner](#) (OAIC) (accessed July 2026)
- [Australian Privacy Principles](#) (APPs) (accessed July 2026)

9. Related TITAN Documents

- Grievances Policy and Procedure
- Human Resources Framework
- Intellectual Property and Copyright Policy and Procedure
- Records and Data Management Policy and Procedure

10. Version Control

Combined Policy and Procedure Version Control		
Version #	Date of Change	Change Summary
2026.1	July 2026 Approved BoD 23.09.2026	Policy and Procedure Documents were combined into one complete document. Layout of the document updated, more information added into each section. Added links to relevant legislation and websites. Document has been recoded and irrelevant information removed.

Original Policy Version Control		
Version #	Date of Change	Change Summary
1.0	1-Sep-21	Draft approved by Board of Directors 17-Sept-21
1.1	10-Oct-23	Administrative updates following TEQSA registration
Original Procedure Version Control		
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1.0	1-Sep 21	Draft approved by Board of Directors 17-Sept-21
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Warning –

- Document uncontrolled when printed! The current version of this document is maintained on the TITAN website.