Greenwich College

Group Privacy and Data Protection Policy

NextEd Group

POLICY NAME	Group Privacy and Data Protection Policy
POLICY MANAGER	Executive General Manager, Group Quality, Accreditation & Compliance
APPROVAL AUTHORITY	CEO
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1. Introduction

1.1. Purpose

Greenwich College has developed this policy specifically to ensure compliance with its obligations regarding the collection, use, disclosure, retention and protection of personal information of all students (prospective and actual) and employees. This is a separate policy from the Privacy Policy of Greenwich College itself.

1.2. Scope

This policy is an overarching Group policy and applies to:

i) All staff of Greenwich College including employees and contractors
ii) All courses delivered by Greenwich College including those delivered on their behalf by education providers with whom there is a licensing arrangement. If there are any discrepancies between an affiliate's policy and these, the Greenwich College policy will apply.
iii) All students of Greenwich College Pty Ltd (also trading as Greenwich English College, Greenwich Management College, Greenwich Hospitality College, Greenwich Health & Care College) RTO: 91153, CRICOS: 02672K

1.3. Definitions

Word/Term	Definition
Personal information	This is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. Personal information collected by Greenwich College may include (but is not limited to) the following: Name; email address; contact details; Tax File number, visa details, passport details; education history; course and unit enrolment details; if applying for a job with Greenwich College information from your resume or job application.
Special categories of personal information	This includes information about an individual's racial or ethnic origin, religious or similar beliefs, physical or mental health or condition, criminal offences, or related proceedings. Any special category of personal data is only collected in accordance with regulatory requirements. Any use of special categories of personal data will only be used under strict control and in accordance with this policy.
Student	Means a student (domestic or international) who is: • enrolled in an award course of Greenwich College; • enrolled in a non-award course of Greenwich College; • enrolled in a course offered by any other entity operating on behalf of Greenwich College.

2. Policy

2.1. Collection and Retention of Information

a) Greenwich College may collect for inclusion in a record and hold the following types of personal information:

i) Name, address, date of birth and other relevant information about students that are collected in the course of their selection and enrolment with Greenwich College to enable proper administration of the students course of study and contact with the student before, during or after the students course of study, Greenwich College's internal planning requirements, the organisation and coordination of relevant health and welfare programs, facilitation of alumni activities, government and regulatory reporting and administration of funding assistance, payment plans and government loans schemes;

ii) Information disclosed by users of Greenwich College's information technology systems (which are typically systems which store data), collected in the ordinary course of those users' use of such systems;

iii) Name, address, date of birth and information or opinion about character, capabilities, performance and other attributes of staff and potential staff members and potential and actual contractors, and tax identifiers, bank account details and insurance information (including worker's compensation insurance information) about contractors, that are collected during recruitment of and employment of staff members or the selection or engagement of and dealing with contractors;

iv) Name, address, financial product holdings and dealings, bank account details, and tax and other identifiers of holders (or potential holders) of financial products issued by Greenwich College, that are collected while responding to applications for the acquisition of the financial product, maintaining existing relationships with holders and maintaining security registers (including external security registers, or as may be required by the Corporations Act 2001 (Cth); and

v) Name, address, email address and information about roles, means of communication with and personal attributes of officers, employees, contractors, and representatives of corporations and entities with whom Greenwich College deals, that are collected incidentally while dealing with those corporations and entities.

b) Greenwich College may collect or hold sensitive information as required by: Australian law; by a government department or agency; or to fulfil its employee obligations, domestic student obligations, its international student visa obligations, or comply with the policies of Greenwich College. Unless the collection is required by Australian law, Greenwich College will obtain consent from the individual before it collects sensitive information.

c) If Greenwich College receives unsolicited information (including sensitive information) about individuals from the individual or from other persons, Greenwich College will only collect and hold the information in a record if it is reasonably necessary for Greenwich College's functions or activities and will hold such information in accordance with the Privacy Act and any requirements of laws of countries and territories that may apply to Australian companies from time to time.

i) Should an individual request that data collected be deleted from Greenwich College's data storage systems, unless required to retain such information under Australian law or by a government department or agency, Greenwich College will comply with this request.
ii) Where collected data is no longer required to be retained under Australian law or by a government department or agency this data will be deleted.

d) Greenwich College will use only lawful and fair means of collecting personal information.

e) The information set out in 1.1 (a), (b), (c), and (d) may be held in either/and hard copy and as electronic records and the information set out in paragraph 1.1 (e) is held electronically. Where information is held in electronic records or electronically, it will be held in data storage systems which permit lawful access by only those Greenwich College staff members who need access to the information in order to perform their functions.

2.2. Use and Disclosure of Information

a) Greenwich College uses and discloses the above types of information only for the following purposes:

i) Delivering the Greenwich College services including educational services and other activities as provided from time to time;
ii) Providing student recruitment services;
iii) Promoting Greenwich College (and its susiduaries') services;
iv) Administration of Greenwich College's business including the selection, recruitment, teaching and assessment of students, administration of students' courses of study, regulatory reporting, internal planning requirements, the organisation and coordination of health and welfare programs, facilitation of alumni activities, receiving and making payments, and communication with individuals concerned; and
v) Complying with Greenwich College's legal obligations.

b) Greenwich College will generally not disclose personal information to anyone except:

i) In the manner described in this Policy;
ii) When the individual consents to a particular disclosure; or
iii) Where the identifying data can be removed.

c) Greenwich College will disclose personal information to third parties only for the purposes discussed in this Policy. When Greenwich College discloses personal information to third parties, Greenwich College will make all reasonable attempts to ensure it discloses only relevant information and that it is accurate, complete and up to date and that third parties commit to complying with the Privacy Act and equivalent legislation in other territories (if applicable).

d) There may be disclosures where:

i) The individual would reasonably expect the disclosure to occur (for example quality assurance purposes, training and the purpose of enhancing Greenwich College's services);
ii) It is required for Greenwich College to recover unpaid fees owing it;
iii) Greenwich College is authorised or compelled by law to disclose;
iv) It will prevent or lessen a serious threat to someone's life, health or safety ort a threat to public health or safety;
v) It is necessary to take appropriate actions in relation to any suspected unlawful activity or serious misconduct;
vi) It is necessary to locate a missing person, subject to compliance with rules made by the Australian Information Commissioner;
vii) It is necessary as part of the establishment, exercise or defence of a legal claim;
viii) It is requested by an enforcement agency such as the police;
- It is necessary part of an investigation following a complaint or incident; or
- It is necessary for a confidential alternative dispute resolution process.

e) Greenwich College is unlikely to disclose personal information overseas except as may be necessary or appropriate to Greenwich College's business if a student or potential student is located outside of Australia will be dealing with a third-party agent contracted by Greenwich College to recruit students on its behalf and the services offered by that agent may be located outside of Australia.

f) Greenwich College will disclose personal information overseas only if the individual consents or if Greenwich College reasonably believes that the personal information is protected overseas in a substantially similar way to its protection under the privacy laws and privacy principles that apply to Greenwich College in Australia, (and where the individual is domiciled in a European Union country is handled in accordance with European Union law).

g) Greenwich College has processes in place to ensure that the records of personal information remain accurate, complete and up to date. Greenwich College has systems and procedures in place to protect personal information from misuse or loss, and from unauthorised access, modification or disclosure.

h) If the personal information is no longer required by Greenwich College for any purpose for which it was collected or Greenwich College is no longer able to ensure that the personal information is accurate, complete or up to date and it is no longer required by law to be retained by Greenwich College, then Greenwich College will permanently destroy or de-identify he personal information.

i) For students utilising either of the Commonwealth governments student loan schemes (FEE-HELP or VET Student Loan) information provided as part of the application process will upon submission automatically be copied to Services Australia.

2.3. Access and Correction of Information

a) Greenwich College has measures in place to ensure that the personal information it holds is accurate, complete and up to date before acting on it. If an individual learns that personal information Greenwich College holds about the individual, such as address and contact details, is inaccurate, incomplete or not up to date the individual should contact Greenwich College so that the information can be promptly updated in order to maintain the accuracy and completeness of the individual's personal information and to ensure that any communications are correctly addressed. In the case that the student holds a student visa they are required to do so within 7 days of any changes to details in accordance with Australian visa requirements.

b) If an individual wishes to see what information Greenwich College holds about the individual, the individual may contact Greenwich College and ask for a copy. Sometimes it may not be possible for Greenwich College to provide a copy of the information if it was provided anonymously, if it contains details about other people that the individual making the request is not authorised to access, or if it would be unsafe to provide the information because it may lead to harm being done against another person.

c) If Greenwich College refuses to provide an individual with access to the individual's record or to update the record in the way the individual requests, Greenwich College will provide written reasons.

d) If Greenwich College refuses to correct or update an individual's personal information, the individual may request that Greenwich College make a note on the record that the individual is of the opinion that the information is inaccurate, incomplete, out of date, irrelevant or misleading.

e) Greenwich College will not charge the individual for lodging a request for a copy of the individual's personal information but may ask the individual to pay a reasonable fee for the work involved in providing the information and for any associated costs such as printing. The individual will be notified of any likely costs before the request is processed.

2.4. Privacy Complaints

a) If an individual has a privacy complaint or concern, specially of the individual thinks that the individual's privacy has been affected or the individual wishes to complain about Greenwich College's refusal to update or grant the individual access to their personal information, the individual should contact Greenwich College's privacy officer who will examine the complaint.

b) If the individual is dissatisfied with how Greenwich College's privacy officer deals with the complaint, the individual can subsequently complain about the privacy matter to the Australian Information Commissioner. See https://www.oaic.gov.au/ for further information about how to make a complaint.

2.5. Reporting Breaches

a) Any breach of this policy or of data protection laws must be reported as soon as practically possible. This means that as soon as you have become aware of a breach it is important to notify us.

b) All members of staff have an obligation to report actual or potential data protection compliance failures. This allows Greenwich College to:

1. Investigate the failure and take remedial steps as required;
2. Maintain a register of compliance failures; and
3. Notify the Office of the Australian Information Commissioner of any compliance failures that are material either in their own right or as part of a pattern of failures within 30 days.

c) Any member of staff who fails to notify of a breach or is found to have known or suspected a breach has occurred but has not followed the correct reporting procedures will be liable to disciplinary action.

2.6. Audits, Monitoring and Training

a) Regular data audits are scheduled to maintain data integrity, and both manage and mitigate risks. The outcomes will be recorded in the data register. This register contains information on what data is held, where it is stored, how it is used, who is responsible and any further regulations or retention timescales that may be relevant.

b) The Data Protection officer (DPO) has overall responsibility for this policy. Greenwich College will keep this policy under review and amend or change as required from time to time.

2.7. Privacy Notice - EU and Brazil Citizens Only

a) When collecting the personal information of European Union citizens this data will be protected, retained, and managed in accordance with the requirements of the General Data Protection Requirements as well as the Privacy Act 1988 (Cth) and the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth) requirements. Information collected will only be that data as determined to be necessary to enroll students into courses and in accordance with the requirements of government departments and agencies.

b) When collecting the personal information of Brazilian citizens this data will be protected, retained, and managed in accordance with the requirements of the General Data Protection Law (LGPD) as well as the Privacy Act 1988 (Cth) and the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth) requirements. Information collected will only be that data as determined to be necessary to enroll students into courses and in accordance with the requirements of government departments and agencies.

2.8. Cyber Security Policy

Cyber-attacks are an increasing risk to all organisations and individuals alike. The Greenwich College group Limited and its subsidiary entities implement security systems and processes to minimise the risks of cyber-attacks and reduce the scope of any attempts. The Greenwich College Group Limited has data recovery systems in place, should data be corrupted in any way, including because of cyber-attacks. The Greenwich College Group Limited only shares data where required to do so, i.e. in accordance with legislative and government regulatory requirements. Permission levels to access data have been established and appropriate policies and procedures are in place in regard to privacy and data collection, data breaches and reporting.

2.9. Generative Ai

The advent of generative artificial intelligence (GenAi) as a mainstream resource accessible by anyone with internet access presents a range of opportunities and concerns for organisations and individuals alike. GenAi has the capability to simplify work processes and accelerate productivity. It also can distort data and undermine quality and integrity. The Greenwich College Group Limited and its subsidiary entities take both the opportunities and concerns associated with GenAi seriously. In doing so it promotes innovation where there is obvious value-add and equally it promotes caution in how it is utilised and accessed.

2.10. Contact Privacy Officer

For further information on this policy or to lodge a privacy complaint, please contact the Greenwich College Privacy Officer:
Email: privacyofficer@nexted.com.au

2.11. Publication

This procedure is published on each Greenwich College education provider's website and LMS to ensure students have up-to-date and accurate information publicly available to them.

3. Reference and Supporting Information

3.1. Supporting Documentation

Document name	Document type	Location
ASQA Standards for RTO's 2025	Regulatory Standards	External
European Union's General Data Protection Regulation (GDPR) 2016	Legislation	External
General data protection Law (LGPD) Brazil	Legislation	External
Higher Education Support Act 2003	Legislation	External
National Vocational Education and Training Regulator Act 2001	Legislation	External
Privacy Act 1988	Legislation	External
Privacy Amendment (Notifiable Data Breaches) Act 2017	Regulatory Standards	External
Tertiary Education Quality and Standards Act 2011	Regulatory Standards	External
The Education Services for Overseas Students (ESOS) Act 2000	Legislation	External
The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018	Regulatory Standards	External
USI Privacy Notice	Policy	Website

3.2. Change History

Version	Approval date	Department Approved by	Change
V1.0	30 April 2018	General Manager Group Quality, Accreditation & Compliance	Development of Group Policy replacing existing entity level policies
V1.1	05 September 2019	Group Quality, Accreditation & Compliance General Manager National Academic Manager	Update to new AIT template
V1.2	17 November 2020	Group Quality, Accreditation & Compliance General Manager National Academic Manager	Addition of reference to LGPD (Brazil)
V2.0	30 August 2022	Chief Executive Officer	Update to new iCollege Group template
V02/23	24 February 2023	Chief Executive Officer	Update to new NextEd template;

V2.2	25 March 2024	Group Quality, Accreditation & Compliance General Manager National Academic Manager	Updated with Cyber Security & Gen Ai statements
V2.3	25 June 2025	Group Quality, Accreditation & Compliance Quality Assurance Coordinator National Academic Manager	Updated Group Logo, Greenwich headers and footers.
V2.4	18 August 2026	Group Quality, Accreditation & Compliance General Manager National Academic Manager	Updated Privacy Officer Contact details