

Student Information Management Procedures

Table of Contents

1. Governing Policy
2. Purpose
3. Definitions
4. Procedures
 - 4.1. Responsibilities
 - 4.2. Confidentiality
 - 4.3. Collection, storage, use and disposal
 - 4.4. Staff access
 - 4.5. Student access and correction
 - 4.6. Disclosure to third parties
 - 4.7. Freedom of Information
 - 4.8. Complaints
5. Related links

1. Governing Policy

[Privacy Policy](#)

2. Purpose

To set out responsibilities and processes related to the collection, storage, use, management, protection and disclosure of student information.

3. Definitions

For the purposes of these procedures, the following definitions apply:

personal information	means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not, or as otherwise defined by applicable data protection laws
student	any prospective student, applicant for admission to a Flinders University award, current student of an award course or topic and/or former or past student of the University
student information	personal information about a student collected and/or stored by Flinders University

4. Procedures

4.1. Responsibilities

All staff members and other members of the University community who are involved in the collection, storage, use, management, protection or disclosure of [student information](#) in the course of their University duties are responsible for ensuring that they apply the [Privacy Policy](#) and these procedures in respect of that student information.

4.2. Confidentiality

All [student information](#) must be treated as confidential and not disclosed to other persons except:

- a. to Flinders University staff who have a demonstrated a need for this information to carry out their duties, or
- b. where disclosure is permitted by these procedures and/or the [Privacy Policy](#), or
- c. where the disclosure is permitted, authorised or required by law.

4.3. Collection, storage, use and disposal

- a. When [student information](#) is collected, all reasonable steps must be taken to:
 - i. collect information directly from the student
 - ii. ensure that information collected is accurate, relevant, up-to-date, complete, and not misleading
 - iii. inform students of the purpose for which the information is collected, and
 - iv. inform students of any third party to which the University usually discloses the information that is being collected.
- b. Once student information is collected, all reasonable steps must be taken to protect it adequately to prevent misuse or unauthorised access or disclosure of the information—specific security frameworks and responsibilities for the storage and management of University information is defined in the University's [Information Security Policy](#).
- c. Particular care must be taken for the security and confidential storage of 'sensitive information' (as defined in the [Privacy Policy](#)).
- d. Student information may only be used for purposes that are permitted, authorised or required by law listed in the [Privacy Policy](#).
- e. If student information has been obtained for a specific purpose, it may not be used for any other purpose, unless:
 - i. the individual concerned has consented to its use as proposed (which, in the case of enrolled students, is obtained when the student agrees to the Privacy Policy at the time of enrolling)
 - ii. the individual would reasonably expect such information may be used for the other purpose and such purpose is related to the specific purpose for which it was collected
 - iii. use of the information is required or authorised by law
 - iv. it is necessary in order to prevent or lessen a risk to the life or health of the individual concerned, or another person, or
 - v. such use is permitted by the privacy laws.
- f. Where student information is no longer required for University purposes, it must be destroyed in accordance with the [Records Management Policy](#).

4.4. Staff access

- a. Staff access to [student information](#) is only available to staff members who require the information in order to carry out their duties and responsibilities.
- b. Staff who are granted access to student information must use that information only for legitimate purposes and activities related to the scope of their duties and responsibilities, and in accordance with these procedures and the [Privacy Policy](#).
- c. Staff requiring access to systems holding student information must apply on the relevant forms to the business owner of the system with the approval of their supervisor.

4.5. Student access and correction

- a. Students may seek access to and correction of [student information](#) by using self-service systems when available, or otherwise contacting Flinders Connect in accordance with s.11 of the [Privacy Policy](#).
- b. Flinders Connect will refer all such requests to the Associate Director, Student Administration Services for consideration and response.
- c. Where access is granted, the requested student information may only be viewed in the presence of a member of staff. At no time will a student be permitted to view any student information which is restricted or which contains information on another person.
- d. Where information is held within a College, the Director, Student Administration Services (or nominee) will liaise with the relevant manager to put in place appropriate arrangements for the student to view the information.
- e. Students may also exercise their rights to access information under the [Freedom of Information Act 1991 \(SA\)](#).

4.6. Disclosure to third parties

[Student information](#) must not be disclosed to third parties—i.e. persons, bodies or agencies outside the University (including parents, spouses or other relatives or friends of the student, or to staff who have no need of the information)—unless one of the following provisions apply:

4.6.1. Reasonable expectation

Student information may be disclosed to third parties if the individual would reasonably expect the University to disclose the information for the secondary purpose and such purpose is related to the primary purpose of collection.

4.6.2. Student consent

Student information may be disclosed to third parties with the consent of the student concerned, provided the consent is given expressly and in writing, and the consent specifies the extent and nature of the information the student agrees may be disclosed.

4.6.3. Statutory or other legal authority

- a. Student information may be disclosed to third parties if disclosure is required under:
 - i. State or Commonwealth legislation, or
 - ii. a valid Court order or other authority (such as a subpoena, summons, or search order), or
 - iii. a valid State or Federal Police search warrant (or when other circumstances justify the release of the information to State or Federal Police in the absence of a search warrant).
- b. Requests for such disclosure must be directed to the Director, Student Administration Services, who will take reasonable steps to verify the validity of any request for student information before disclosure is made.

4.6.4. Staff of an associated or affiliated organisation, or a contracted third party

Student information may be disclosed to staff of an associated or affiliated organisation of the University when required for official University activities, or to a contracted service provider which performs services on the University's behalf, subject to prior approval by the Director, Student Administration Services following request to the Associate Director, Student Administration Services.

4.6.5. Verification of a testamur or transcript of academic record

- a. Student information may be disclosed to verify the bona fides of a testamur or transcript of academic records, upon request by a person or body with a valid reason for seeking the information (e.g. another university or a prospective employer), subject to the prior approval of the Director, Student Administration Services.
- b. Requests for such disclosure must include a copy of the testamur or transcript and be directed to the Director, Student Administration Services, who will take reasonable steps to verify the validity of the request before disclosure is made.
- c. Falsification of testamur or transcript:
 - i. If there is evidence that a testamur or transcript of academic record submitted for verification may have been falsified, a formal report will be made to the Deputy Vice-Chancellor (Students), including a copy of the falsified document, details of the document's submission, and a copy of the student's actual testamur or transcript.
 - ii. On receipt of the report the Deputy Vice-Chancellor (Students) or nominee will undertake an investigation, which will include an invitation to the student to respond.
 - iii. If the allegation is proven to the satisfaction of the Deputy Vice-Chancellor (Students), the student will be notified and the following actions or penalties may be applied, taking into account any extenuating circumstances:
 - issue of a formal warning about the student's conduct
 - preclusion of the student from further enrolment at the University, and/or
 - referral of the matter to an external authority.

4.6.6. Bona fide researchers

- a. Student information may be disclosed to bona fide researchers (University staff or higher degree by research (HDR) students or, in special circumstances, outside organisations and individuals) who are undertaking projects which require access to de-identified student information.
- b. Any decision about disclosure will have regard to available resources and take into account the extent of the work and any possible impact on University surveys.
- c. Staff or students who are considering undertaking research requiring access to de-identified student information must initially consult:
 - i. the Director, Student Administration Services about the feasibility of obtaining the information and associated costs, and
 - ii. the Secretary of the Social and Behavioural Research Ethics Committee (or other relevant ethics committee) about the likelihood of the project being approved by that committee.
- d. Formal requests to access student information must be lodged in writing with the Director, Student Administration Services, and must include:
 - i. a statement explaining the purpose of the research project
 - ii. a clear description of the information set required
 - iii. details of the feasibility of obtaining the information and associated costs
 - iv. a copy of the survey instrument (where applicable), and
 - v. confirmation of ethics approval for the project by the relevant ethics committee.
- e. Under no circumstances will student contact details be released to any researcher. If the research involves contacting students, Student Administration Services will distribute materials to the students

on behalf of the researcher. All costs, including Student Administration Services staff time, must be met by the researcher. The materials distributed must contain a clear statement of purpose, and make it clear that responses are entirely voluntary and made directly to the researcher. Student Administration Services will provide no other follow-up or forwarding services.

4.6.7. A 'permitted general situation'

- a. Student information may be disclosed where a 'permitted general situation' exists as defined in s.16A of the [Privacy Act 1988](#) (Cth), subject to the prior approval of the Deputy Vice-Chancellor (Students) or an officer specified at c. below.
- b. This might include disclosure to:
 - i. lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety
 - ii. investigate or take other appropriate action in relation to suspected unlawful activity or misconduct of a serious nature
 - iii. locate a person who has been reported as missing, or
 - iv. protect the University's legal interests or in connection with a confidential alternative dispute resolution process.
- c. The following officers are authorised to disclose student information under Procedure 4.6.6:

Vice-President & Pro-Vice-Chancellor (International)	College Deans (People & Resources)
Manager, International Student Services	College Deans (Education)
Deputy Vice-Chancellor (Research)	Director, Student Life
Dean of Graduate Research	Director, Student Administration Services
College Vice-President & Executive Deans	Associate Director, Customer and Site Services
Directors of College Services	Manager, Security and Parking

4.7. Freedom of Information

Any request for [student information](#) made under the *Freedom of Information Act 1991* (SA) must be referred immediately to the University's Freedom of Information Officer.

4.8. Complaints

The process for lodging a complaint about a breach of confidentiality, misuse or inappropriate disclosure of [student information](#) held by the University is specified in the [Privacy Policy](#).

5. Related links

[Australian Privacy Principles](#)

[Government of South Australia's Information Privacy Principles](#)

Approval Authority	Deputy Vice-Chancellor (Students) in consultation with the General Counsel and University Secretary
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* Unless otherwise indicated, this policy or procedures still apply beyond the review date.

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