

	Document Name	Privacy and Personal Information Policy
	Document No.	FM-28
	Reviewed by	Systems Manager on 25/09/2025
	Authorised by	CEO on 26/09/2025
	Comment	It is the responsibility of the recipient to identify/control superseded documents

INTRODUCTION

Purpose

GEM College of International Business, hereafter referred to as 'GEM College', respects the privacy of individuals whose personal information it collects and holds.

This policy explains how GEM College collects, holds, uses, discloses and protects personal information and how individuals may request access or correction or make a privacy complaint.

Scope

This policy applies to personal information held by GEM College about prospective, current and former students, employees, contractors, clients and other individuals. It also applies to personal information handled by third parties providing services on behalf of GEM College.

Regulatory framework

GEM College manages personal information in accordance with the Privacy Act 1988, the Australian Privacy Principles, the Student Identifiers Act 2014, the National VET Data Policy and other applicable legislative and regulatory requirements.

As a registered training organisation, GEM College must manage personal information in accordance with applicable privacy laws, as set out in section 20 of the Compliance Standards.

DISCUSSION

1. Personal information collected

GEM College may collect and hold:

- Identity, contact and demographic information;
- Enrolment, training, assessment and qualification records;
- Education, employment and vocational information;
- Unique Student Identifier information;
- Funding, fee and payment information;
- Information about support, disability, health or cultural needs where relevant;
- Complaints, appeals and disciplinary information; and
- Communications between the individual and GEM College.

Sensitive information is collected only where reasonably necessary and with consent or where collection is authorised or required by law.

If required information is not provided, GEM College may be unable to process an enrolment, provide training and assessment, determine funding eligibility or meet its reporting obligations.

2. Collection of personal information

GEM College generally collects personal information directly from the individual through enrolment and other forms, correspondence, interviews, online systems and the provision of training and assessment services.

Information may also be collected from an employer, sponsoring organisation, government agency, education provider or other person where the individual has consented or collection is otherwise authorised or required by law.

At or before collection, GEM College provides any required privacy notice, including the applicable National VET Data Policy Privacy Notice for VET enrolments.

Enrolment declarations and consent

As part of enrolment, applicants are to be provided with the applicable privacy collection notice and asked to complete GEM College's Declaration on Enrolment. The declaration records required acknowledgements, authorisations and consents relating to enrolment, information verification and the collection, use or disclosure of personal information. The declaration forms part of the enrolment documentation and is maintained separately from this policy.

3. Use of personal information

GEM College uses personal information to:

- Process enrolments and provide training, assessment and student support;
- Create or verify a Unique Student Identifier where authorised;
- Manage fees, payments and accounts;
- Maintain training, assessment and certification records;
- Meet regulatory, funding, reporting and legal obligations;
- Manage complaints, appeals and service quality; and
- Communicate with individuals about GEM College services where permitted by law.

Personal information is only used for the purpose for which it was collected, a related purpose the individual would reasonably expect, with consent, or where otherwise authorised or required by law.

Direct-marketing communications will provide a simple means of opting out. Opt-out requests will be actioned within a reasonable period.

4. Disclosure of personal information

GEM College may disclose personal information to:

- Trainers, assessors, contractors and service providers who require it to perform authorised functions;
- Employers or sponsoring organisations where the individual has consented or disclosure is otherwise authorised;
- The National Centre for Vocational Education Research;
- Commonwealth, state and territory government agencies, funding bodies and regulators;
- The Student Identifiers Registrar;
- Professional advisers, auditors and insurers; and
- Other persons or organisations where the individual has consented or disclosure is authorised or required by law.

GEM College does not disclose personal information to another RTO, employer, related organisation or representative merely because of that relationship. The disclosure must be authorised, reasonably expected, required for the relevant service or permitted by law.

5. Overseas disclosure

GEM College is not ordinarily likely to disclose personal information to recipients located outside Australia.

6. Storage, security and retention

GEM College takes reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

Personal information is protected through secure physical and electronic storage, restricted access, staff training and appropriate controls over contractors and service providers.

Personal information is retained for the period required by applicable legislative, regulatory, funding and contractual requirements. When it is no longer required, GEM College securely destroys or de-identifies it.

7. Data breaches

Suspected loss, unauthorised access or unauthorised disclosure of personal information must be reported immediately to the person responsible for privacy at GEM College.

GEM College will contain and assess the incident and, where an eligible data breach has occurred, notify affected individuals and the Office of the Australian Information Commissioner in accordance with the Notifiable Data Breaches scheme.

8. Unique Student Identifiers

GEM College collects, verifies, uses and discloses Unique Student Identifiers only as authorised by the Student Identifiers Act 2014.

A Unique Student Identifier must not be used as GEM College's internal student identifier or displayed on AQF certification documentation.

9. Access and correction

Individuals may request access to, or correction of, personal information held about them by contacting GEM College using the details below. GEM College will respond within a reasonable period, normally within 30 days.

Where access or correction is refused, GEM College will provide written reasons and information about how the decision may be challenged, except where the law permits otherwise.

10. Privacy complaints

A person who believes GEM College has not complied with this policy, the Privacy Act or the Australian Privacy Principles may submit a complaint using the contact details below.

GEM College will acknowledge the complaint, investigate it and provide a written response within a reasonable period, normally within 30 days. If the complaint is not resolved, the person may complain to the Office of the Australian Information Commissioner.

11. Contact details

Requests for access or correction, privacy complaints and privacy enquiries may be directed to:

CEO - GEM College of International Business (Australia)

Address:	PO Box 20, North Adelaide SA 5006, Australia		
Phone:	61 8 8342 3316	E-mail:	admin@gemcollege.edu.au

This policy is available free of charge through the GEM College website. A copy will be provided in an appropriate alternative form on request where reasonably practicable.

SUMMARY

GEM College collects and uses personal information only where reasonably necessary for its operations or where authorised or required by law.

In particular:

- Individuals must be informed about the collection and intended use of their personal information;
- Personal information must only be used or disclosed for an authorised purpose;
- Reasonable safeguards must protect personal information;
- Information that is no longer required must be securely destroyed or de-identified;
- Eligible data breaches must be managed under the Notifiable Data Breaches scheme;
- Individuals may request access to or correction of their information; and
- Privacy complaints must be investigated and responded to within a reasonable period.

Nothing in this policy limits any privacy right available under applicable legislation.



Chief Executive Officer - Monique McCloskey