



ECU Student Guild

PRIVACY POLICY

POLICY TYPE	Operational & Senate
POLICY SUBTYPE	Administration
POLICY TITLE	Privacy Policy
POLICY OWNER	Operations Manager

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1. INTENT

- 1.1. While the Edith Cowan University Student Guild is an independent incorporated body and is not a public entity for the purposes of the Privacy Act 1988 (Cth) and Responsible Information Sharing Act 2024 (WA), the Guild recognises the importance of responsible information handling and information-sharing practices in Western Australia, particularly where we work with public entities or receive personal information from them.
- 1.2. The Guild seeks to align its privacy governance with contemporary Western Australian best practice, including principles of accountability, security, transparency, and proportionality.
- 1.3. At Edith Cowan University Student Guild (referred to as "the Guild," "we," "us," or "our"), we are committed to protecting the privacy and personal information of our members, visitors, and stakeholders.
- 1.4. This Privacy Policy outlines how we collect, use, disclose, and protect the personal information we collect in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).'
- 1.5. The collection, use or disclosure of personal information will be fair and reasonable in the circumstances.

2. ORGANISATIONAL SCOPE

- 2.1. This policy is binding to all Employees, Volunteers and Contractors of the Edith Cowan University Student Guild, our departments and our related bodies' corporate.

3. DEFINITIONS

- 3.1. The singular includes the plural and vice-versa.
- 3.2. A reference to:
 - 3.2.1. A person includes a corporation and government or statutory body or authority;
 - 3.2.2. A person includes the legal personal representatives, successors, and permitted assigns of that person; and
 - 3.2.3. A statute, ordinance, code or other law includes regulations and other statutory instruments under it and consolidations, amendments, re-enactments or replacements of any of them by any legislative authority.
- 3.3. The word "including" and similar expressions are not words of limitation.
- 3.4. The word "under" includes by and by virtue of; as well as, pursuant to and in accordance with.
- 3.5. **CIDC** means the Continuous Improvement and Development Committee.

3.6. **Employee** means an individual engaged by the Guild under a contract of Employment.

3.7. **The Guild** means Edith Cowan University Student Guild.

3.8. **Personal Information** means any information or opinion about an identified or identifiable individual. It includes information that directly identifies a person, such as their name, address, or contact details, as well as information that may indirectly identify a person when combined with other data. encompasses various types of data, including but not limited to:

- Names and contact information: This includes a person's full name, address, phone number, email address, or social media handle.
- Identifiers: Any unique identifiers assigned to an individual, such as driver's license numbers, passport numbers, or employee identification numbers.
- Financial and billing details: Information related to a person's financial transactions, such as bank account or credit card numbers, income details, or taxation information.
- Sensitive information: This refers to information about an individual's racial or ethnic origin, political opinions, religious beliefs, sexual orientation, health information, or criminal records.
- Employment-related information: Personal information collected in the context of employment, including resumes, job applications, employment history, performance evaluations, and salary details.
- Online identifiers: Information collected through online platforms, such as IP addresses, cookies, or other unique digital identifiers.

3.9. **Senate** means the governing body of the Guild.

3.10. **'us' 'we' or 'our'** means the ECU Student Guild ABN 87 081 487 187, our departments and our related bodies corporate

3.11. **Volunteer** means any person engaged by the Guild under a voluntary capacity to undertake work on behalf of the Guild. For the purpose of this policy, it includes Edith Cowan University Guild Senators.

4. OVERVIEW

4.1. All Guild policies are approved, amended or repealed by the Senate in accordance with the Guild's Policy Framework and compliance with relevant governance instruments, following consultation with CIDC.

4.2. The Guild shall maintain a policy manual of all current policies in a manner which is easily accessible to members, Senate, staff and other stakeholders where appropriate.

4.3. All Guild policies will be reviewed annually.

5. POLICY

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5.1. Privacy Officer

5.1.1. The Operations Manager of Edith Cowan University Student Guild will be the senior employee responsible for the application and management of this Privacy Policy and the Privacy obligations of the organisation.

5.1.2. The Privacy Officer is responsible for overseeing compliance with this Privacy Policy, managing privacy complaints and data breaches, and acting as the primary point of contact for privacy related matters.

5.1.3. The Privacy Officer reports to the Guild Senate as required on privacy risks and compliance matters.

5.2. Collection of Personal Information

5.2.1. We may collect personal information from individuals in the course of our activities, including but not limited to:

5.2.1.1. Membership and Engagement: When individuals become members of the Guild or engage with our services, we may collect personal information such as name, contact details, student identification number, and academic program details;

5.2.1.2. Surveys and Feedback: We may collect personal information when individuals participate in surveys, feedback forms, or other research initiatives conducted by the Guild;

5.2.1.3. Events and Activities: When individuals register for or attend events, activities, or workshops organised by the Guild, we may collect personal information required for event management and communication purposes;

5.2.1.4. Website and Online Services: When individuals access our website or use our online services, we may collect personal information such as IP address, browser type, and browsing behaviour through the use of cookies or similar technologies;

5.2.1.5. Sales: details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries inclusive of banking/credit/debit card information;

5.2.1.6. information you provide to us through emails and phone calls; or

5.2.1.7. any other personal information that may be required in order to facilitate your dealings with us.

5.2.2. We may use the personal information we collect for the following purposes:

5.2.2.1. Providing Services: To provide and administer our services, including membership management, event registration, and communication with members and stakeholders;

5.2.2.2. Communication: To communicate with individuals about our activities, events, programs, and services, including updates, newsletters, and promotional materials.;

5.2.2.3. Research and Analysis: To conduct research, surveys, and analysis to improve our services, understand our members' needs, and evaluate our programs and initiatives;

5.2.2.4. Compliance: To comply with legal obligations, enforce our terms and conditions, and protect the rights, property, or safety of the Guild and its members

5.2.2.5. Recruitment: when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

5.2.2.6. We may also collect your personal information from other persons or entities.

5.2.3. We may disclose personal information to third parties in the following circumstances:

5.2.3.1. Service Providers: We may engage third-party service providers to assist us in delivering our services, and they may have access to personal information solely for the purpose of performing their services on our behalf;

5.2.3.2. Legal Obligations: We may disclose personal information if required by law, regulation, court order, or government request, or when we believe in good faith that such disclosure is necessary to protect our rights, safety, or property;

5.2.3.3. Consent: We may disclose personal information with consent from the individual, either explicit or implied, such as when an individual chooses to participate in a collaborative program or partnership facilitated by the Guild or where systemic issues are raised and we advocate systemically on your behalf or on the behalf of a group of students;

5.2.4. When disclosing personal information, the Guild seeks to ensure that information sharing is limited to what is reasonably necessary for a legitimate purpose and subject to appropriate safeguards.

5.2.5. We may send you direct marketing communications and information about our services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. You may opt-out of receiving

marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link).

5.2.6. We can aggregate your non-personally identifiable data. By using our services, you agree that we can access and aggregate data we have collected from you using reasonable steps to use your personal information in a way it does not personally identify you. We may access, aggregate this data for our own use or for use by us:

5.2.6.1. to audit, research, measure and analyse the information in order to maintain, administer, enhance and protect our products and services, including analysing usage trends and patterns and measuring the effectiveness of content, advertising, features or services;

5.2.6.2. for contextual and cookie-based automated content delivery, such as tailored ads or search results;

5.2.6.3. to prepare aggregate reports for Edith Cowan University and for our own financial reporting. Such reports may include age, gender, geographic, demographic or other general user information, but do not include personal information that personally identifies you.

5.2.7. Disclosure of Personal Information Outside Australia

5.2.7.1. If we send your information outside of Australia, we will require that the recipient of the information complies with local privacy laws and contractual obligations to maintain the security of the data.

5.2.8. Data Security

5.2.8.1. We take reasonable steps to protect personal information from unauthorised access, misuse, alteration, or disclosure. We use industry-standard security measures to safeguard the confidentiality and integrity of personal information in our possession.

5.2.8.2. These steps include, where appropriate:

5.2.8.2.1. Access controls limiting personal information to authorised personnel;

5.2.8.2.2. Secure electronic and physical storage arrangements;

5.2.8.2.3. Staff, volunteer, and contractor awareness of privacy obligations;

5.2.8.2.4. Secure disposal or de-identification of personal information when no longer required.

5.3. Guild Advisory Services and Interactions

5.3.1. Information shared with a Guild Advisory Officer may be shared via direct managers of this Department in order to provide ongoing support and direction to officers engaged in supporting the department's activities.

5.3.2. Information shared with the Guild Advisory Service may be shared with the Guild Senate where pertaining to an investigation of a Student complaint.

5.3.3. Information may also be shared where additional Senate support is required to resolve a student issue or where the matter is systemic in nature, however, consent from the student will be sought and documented in such cases.

5.3.4. There are some situations where your information may need to be provided without your consent. Exceptions to confidentiality where a Duty of Care applies as follows:

5.3.4.1. Your health or safety is at risk;

5.3.4.2. The health and safety of others is at risk;

5.3.4.3. There are serious criminal matters at risk;

5.3.4.4. There is a court directive.

5.4. Using Our Website and Cookies

5.4.1. We may collect personal information about you when you use and access our website.

5.4.2. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

5.4.3. We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

5.4.4. We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

5.5. Transfer of Data to Third Party Applications

5.5.1. Our services may allow you, or others within the relevant subscription to our services to transfer Data, including your personal information, electronically to and from third-party applications and services. We have no control over, and take no responsibility for, the privacy practices or content of these applications or for their data storage processes.

You are responsible for checking the privacy policy of any such applications so that you can be informed of how they will handle personal information.

5.6. Links

5.6.1. Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

5.7. Automated Decision Making

5.7.1. The Guild does not currently use automated decision-making systems that make decisions with legal or similarly significant effects on individuals. If this changes, this Privacy Policy will be updated accordingly.

5.8. Accessing or Correcting Your Personal Information

5.8.1. Individuals have the right to request access to the personal information we hold about them and to request corrections if any information is inaccurate, incomplete, or out-of-date. Requests for access or correction should be made in writing to operations@ecuguild.org.au.

5.9. Making a Complaint

5.9.1. If an individual believes that we have breached their privacy rights or have concerns about our handling of personal information, they may contact us using the contact details provided below. We will investigate and respond to privacy complaints promptly and in accordance with applicable privacy laws.

5.10. Data Breaches

5.10.1. The Guild takes reasonable steps to promptly identify, assess, and respond to any unauthorised access to, disclosure of, or loss of personal information.

5.10.2. Where a data breach is likely to result in serious harm, the Guild will take reasonable steps to notify affected individuals and any relevant regulatory bodies, in accordance with applicable privacy laws.

5.10.3. The Guild will also take steps to mitigate potential harm and review its practices to prevent future incidents.

5.11. Record Keeping

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5.11.1. Personal information is retained and disposed of in accordance with applicable record keeping obligations under the State Records Act 2000 (WA).

6. RELATED DOCUMENTS

Related Policy	•
Related Procedure	•
Other Related Documents	• ECU Student Guild Constitution
Related Legislation	• Privacy Act 1988

7. CONTACT INFORMATION

For queries relating to this document please contact:

Policy Owner	Operations Manager
All Enquiries Contact	operations@ecuguild.org.au
Telephone	08 6304 2640
Email address	l.dwyer@ecuguild.org.au

8. APPROVAL HISTORY

Policy Approved By	Senate
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