

Release of Customer Information Procedure

1. Purpose

This procedure has been established to provide guidance to staff relating to requests for the release of customer information. The two key objectives being:

1. To ensure the protection of individual's personal, sensitive and academic information.
2. To provide guidelines for staff dealing with external enquiries relating to individual's information.

2. Scope

This procedure applies to all processes related to the release of information about students or clients of the Institute by staff of The Gordon.

3. Policy

This Procedure is pursuant to the *Privacy Policy RM PO 04*.

4. Procedure overview / principles

The Gordon is committed to meeting all of the legal obligations expressed in legislation relating to Privacy with respect to the management of customer information and in accordance with our *Privacy Policy RM PO 04*. However, enquiries are often received to release customer information from:

- Students or clients
- Employers/Prospective employers of our students or clients
- Parents/guardians/spouses of our students or clients
- Government agencies, such as Social Security, Worksafe Victoria, Victoria Police
- Other Registered Training Organisation
- Courts

Examples of information sought include:

- Enrolment details
- Fee or Financial details
- Assessment results
- Attendance details
- Location of the student
- Contact details

These matters all relate to the disclosure of an individual's personal information and may be received either in person, over the phone or by mail and may be directed to Student Administration, Customer Services, Program Leads, to individual teachers or other office staff.

The Gordon shall maintain student information that it holds for the purposes of providing services to a customer or student in a confidential manner and the individual's personal information shall only be released as specified below.

All consent forms submitted and processed by the Customer Service or Student Administration teams must be saved in the 'Student Document' section of eCentral.

Students over 18 years of age - No information shall be released in regard to students over 18 years of age without first obtaining the student's consent in writing (*RM FO 06.02*) which is fully authorised by the student.

Students under 18 years of age – Where a reasonable written request regarding attendances and/or progress has been received from a custodial parent of a student under 18 years of age, the information should be supplied.

NOTE: The above is inapplicable in cases where the student is:

- An Apprentice and the information sought pertains to attendance and like matters and is sought by the employer of the Apprentice; and
- The subject of a Notice from a Government Department such as Higher Education and Skills Group which Notice the Institute is obliged to respect.

4.1 Phone enquiries

In general, all phone enquiries for the release of any individual's personal information should be discouraged and the enquirer asked to put the request in writing via email so that it can be promptly reviewed and addressed.

The Gordon is not obliged to identify where a student is located, however where the matter is an emergency and the student is timetabled to be present, the callers contact details and message should be taken and relayed to the student. The name and contact details of the timetabled teacher, student or the location of the classroom must not be released.

Students under 17 years of age cannot be interviewed by a member of the Police Force unless a parent or guardian is present. If the latter is not available, an independent person must be present.

4.2 Current customers

All current students and clients have a right to access their academic results, application history, fees or other personal records. In general this information is directly available to the individual by logging onto eCentral or Gordon Online.

Where a student cannot access this information directly and if their identity can be verified (eg student id number and date of birth) the information can be provided by frontline staff and emailed to the address recorded in eCentral or printed and provided to the customer in person.

If the request is for a replacement of any certificate or statement issued, this request must be registered with the Customer Service office, the applicable fee paid, and forwarded to the Curriculum Office. These documents must not be provided in any format by any staff other than the Curriculum Officers.

4.3 Former student

The Institute maintains records of academic results and awards issued for former students in the student management system and historic archives. All staff who receive requests for former student's information must first attempt to verify the student's identity, full name and date of birth as recorded during their enrolment. Where the information is available to the frontline staff and the person's identity is verified, then the information may be released.

All requests for student records not held in the student management system must be referred to the Curriculum Office curriculumoffice@gordontafe.edu.au who have access to the legacy student databases. If required the Curriculum Office will contact Records and Archives to conduct a paper record search.

If the request is for a replacement of any certificate or statement issued, this request must be registered with the Customer Service office, the applicable fee paid, and forwarded to the Curriculum Office. These documents must not be provided in any format by any staff other than the Curriculum Officers

4.4 Parent / guardian / carer

The Institute can release customer information to a parent, guardian or carer of either:

- An individual who is currently under the age of 18 years of age and that person was recorded as a party on the *Consent to Admit an Underage Student RISK FO 18* If the person originally advised is no longer current an updated Under 18 consent will need to be provided or
- Submitted a request in writing (*RM FO 06.01*)

4.5 Employers of Apprentices and Trainees

Employers of apprentices and trainees receive regular progress reports in relation to their employee. The Employer is provided with information obtained from eCentral relating to nonattendance of training.

However, from time to time additional information is requested and Program Leads and Student Administration are authorised to release additional information relating to academic issues, progress or attendance of an

apprentice or trainee when a written request is received from an employer and the necessary check has been made against Institute records to confirm the validity of the enquiries.

4.6 Government Agencies

The Institute has a legal obligation to respond to requests for customer information received from other government agencies such as Victoria Police, WorkSafe Victoria, or Social Services in relation to investigations or reviews. These requests must be received in writing from a verifiable email address linked to the agency with the reason for the request or received in person with the sighting of relevant official identification and/or authority.

4.7 Court Orders

The Institute has a legal obligation to respond to court orders for the release of customer information. The person who signs for the request becomes legally responsible for the Institute providing the information. Therefore, it is recommended that requests are referred to the Institute's delegated Privacy Officer, the Records Manager who will sign on the Institute's behalf. Where this is not practicable, a copy of the request must be sent to foi@gordontafe.edu.au where it will be formally recorded in the Institute's database and the information collated and released. The person who has signed for the order will be notified when the information has been released.

4.8 Other RTOs

From time to time the Institute receives requests for the verification of Awards or Academic Results from other registered training organisations. Wherever possible these requests should be in writing, and forwarded to curriculum@gordontafe.edu.au who will verify and confirm the authenticity of the information requested – in general this is only that an award of that reference and for that qualification was to an individual, or that the units lists on a statement of results is correct.

4.9 Other Third Party Requests

From time to time the Institute receives requests for information about current or former students from individuals who do not fit the parameters described above. This could include parents of students over 18, employment agencies of former Job Seekers or support workers of students not registered with the Disability Liaison Office

These requests must be treated with caution and the reason for the person requiring the information should be validated.

All requests of this nature must be submitted be in writing (*RM FO 06.02*) and copies stored in eCentral for current students or forwarded to the Institute's Records Manager (records@gordontafe.edu.au) if it relates to historic information.

Information of an historic nature, eg person writing a biography of a former student, must be referred to the Institute's Records Manager (records@gordontafe.edu.au).

The Institute will not act as an intermediary for the exchange of information between a student and any other party, without the written consent of both parties.

4.10 Freedom of Information Request

The Gordon is an Agency under the *Freedom of Information Act 1982* (Vic) and *Freedom of Information Act 1982* (Cth). As such, requests for release of information can be made under the provision of the Act by any individual or organisation. Responses to these requests must be made within a specified timeframe and are subject to external review. Any request for the release of information under the Freedom of Information must be referred immediately to the Records Manager via foi@gordontafe.edu.au as the Institute's delegated FOI Officer.

5. Responsibilities

Position	Responsibility / Governance
Records Manager	For the communication of guidelines for staff dealing with external enquiries relating to student information.

	Has delegated authority as the Institute's privacy and freedom of information officer to release information to third parties where required under law or with the consent of the relevant individual.
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6. Definitions

The following terms and abbreviations are specific to this procedure:

Name	Description
Individual	An individual could be a student or prospective student of The Gordon Institute of TAFE or the Geelong TECH School, or a client or prospective client of The Gordon's Skills and Jobs Centre or other services.
Personal information	Information or an opinion (including information or an opinion forming part of a database), that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, but does not include information of a kind to which Schedule 1 [of] the <i>Health Records Act 2001</i> (Vic) applies.
Sensitive information	Information or an opinion about an individual's: • Racial or ethnic origin, or • Political opinions, or membership of a political association, or • Religious beliefs or affiliations, or philosophical beliefs, or • Membership of a professional or trade association; or trade union, or • Sexual preferences or practices, or • Criminal record, or • Financial information Note that sensitive information also represents personal information.
Unique identifiers	Unique identifiers are an identifier (usually a number) assigned by an organisation to an individual to identify that individual in a unique manner for traceability within the organisation.

7. Key Aligned Internal Documents

Refer to the [Operational Management System \(OMS\)](#) for copies of all policies, procedures and supporting documents.

Authorisation to disclose information RM FO 06.01

Information Release Consent for Information of a Personal or Sensitive Nature RM FO 06.02

Request for Access to Documents or Information RM FO 04.01

Privacy Policy RM PO 04

Request for access to documents or information RM FO 04.01

Records Management Procedure RM PR 03

Assessment Policy TED PO 10

Issue of Awards and Academic Statements STS PR 10

8. Key Aligned Legislation / Documents

There are no Key Aligned Legislation Documents listed in this Procedure.

9. Review and Approval

Business Process Owner	Head of Business Services
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Endorsed by (if applicable)	Not applicable	Endorsed Date	
Approved by (if applicable)	Not applicable	Approved Date	23 July 2024
Review schedule	This procedure will be reviewed every 3 years (or earlier as required)		
Date of next review	23 July 2027		

Minor Structure changes outside of Review schedule		
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