



Disclosure of Personal Information Procedures

1. STRATEGIC PLAN THEME AND COMPLIANCE OBLIGATION SUPPORTED

[Freedom of Information Act 1992 \(WA\)](#)

[Higher Education Support Act 2003 \(Cth\)](#)

[Privacy Act 1988 \(Cth\)](#)

Strategic Plan Theme: [Sustainable Future](#)

2. PROCEDURAL DETAILS

- 2.1 To ensure the privacy of student, staff or third-party personal information held by the University.
- 2.2 To ensure that personal information is handled in accordance with our obligations and our [Privacy Statement](#).
- 2.3 To clarify circumstances where student, staff or third-party personal information may be disclosed.

2.4 Verification of identity

Staff receiving any enquiry in person, by telephone, fax or by email will undertake a verification process with the requestor and assure themselves of the requestor's identity, before any personal information is disclosed. This will be done at the discretion of the staff member to a reasonable level, and can be through sighting a photo identification (ID) (e.g. Curtin University Identification (ID) card, driver's licence, passport) or by confirming identifying information (e.g.: birth date of the individual) or email salutation and/or Curtin directory check.

2.5 Requests will be made in writing where possible

Where possible (or practicable), requests for personal information will be in writing, be supported by the requestor's authority to seek information and will be received through the University's email or other formal correspondence system. This authority will be sighted before any personal information is disclosed, unless otherwise authorised or provided for in these procedures

2.6 Personal Information not to be released through Social media

Apart from exceptional circumstances where it is otherwise authorised by the Information Disclosure Compliance Officer, personal information regarding students, staff or third parties will not be disclosed through social media, including, but not limited to, Facebook, Twitter, Instagram, LinkedIn, Yammer, Pinterest or any emerging social media platforms.

2.7 Assistance from Information Disclosure Compliance Officer

Staff receiving and processing any requests for personal information may seek assistance from the Information Disclosure Compliance Officer at Curtin Information Management and Archives if necessary.

2.8 External Requests for Information

2.8.1 Requests to disclose personal information to a third party

Where a student or staff member requests personal information to be disclosed to a third party, the request should be accompanied by either of the following forms:

- Disclosure of Information and Proxy Authorisation Form available at <http://students.curtin.edu.au/administration/forms.cfm>; or
- Communication Authorisation available at <http://www.tisc.edu.au/static-fixed/download/authact.pdf>.

2.8.2 Requests from Commonwealth Department responsible for Centrelink; Commonwealth or State Departments responsible for Education; Australian Taxation Office, or Government or State departments or other Universities

Staff receiving requests for personal information from the Commonwealth Department responsible for Centrelink; Commonwealth or State Departments responsible for Education; the Australian Taxation Office, other government or state departments or other Universities will forward requests to Student Services.

2.8.3 Requests from Commonwealth Department responsible for Immigration

Staff receiving requests for personal information from the Commonwealth Department responsible for Immigration will forward these requests to Curtin International Office.

2.8.4 Legal requests (including but not limited to subpoenas, search warrants, court orders, Notice to Produce, Notice to Comply)

All legal requests will be forwarded to General Counsel (Legislation and Litigation) in Legal Services. This includes requests where the use or disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process.

2.8.5 Requests for health records

Staff receiving external requests for health records of a student or staff member will forward such requests to Medical Director, Health Services or nominee.

Staff receiving requests for health records related to travel or insurance will forward these requests to the Director, Risk & Assurance or nominee.

Staff receiving requests for health records related to workers' compensation will forward these requests to the Director, People and Culture or nominee.

2.8.6 Requests for counselling records

Staff receiving external requests for counselling records of a student or staff member will forward such requests to Head, Counselling and Disability Services or nominee.

2.8.7 Requests for Personal Information in the event of an emergency or a serious threat to the University community

The University may disclose personal information under the following conditions:

- if it is unreasonable or impracticable to obtain the individual's consent to the use or disclosure; and the University reasonably believes that the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety; or
- the University has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the University's functions or activities has been, is being or may be engaged in; and the University reasonably believes that the use or disclosure is necessary in order for the University to take appropriate action in relation to the matter; or
- the University reasonably believes that the use or disclosure is reasonably necessary to assist any agency, organisation, body or person to locate a person who has been reported as missing; and the use or disclosure is necessary in order for the University to take appropriate action in relation to the matter.

2.8.8 Nominated persons in the event of an emergency or a serious threat to the University community

Staff receiving requests for personal information of or the nominated emergency contact for any student or staff in these circumstances will forward the request to:

- Academic Registrar or nominee (for students); or
- Director, People and Culture or nominee (for staff); or
- Director, Risk Management or nominee (for students and staff); or
- Director, Parking & Security or nominee; or
- Information Disclosure Compliance Officer at Curtin Information Management and Archives or nominee

2.9 All other requests

Staff receiving all other external requests for personal information of a student or staff member will forward such requests to the Information Disclosure Compliance Officer at Curtin Information Management and Archives.

3. RESPONSIBILITIES

In addition to any responsibilities set out in section 2:

3.1. Students and staff

Students and staff are responsible for ensuring that personal information held by the University which is in their possession or control is kept confidential and only disclosed in accordance with these procedures.

All staff who have personal information in their control will be advised of their responsibility to keep that information confidential. They may be advised during pre-employment or at induction.

All staff not otherwise authorised to deal directly with a request for personal information will refer requests of personal information to the appropriate contact person in line with section 3.

3.2. Managers

Managers are responsible for training and advising staff on handling and disclosure of personal information in accordance with these procedures.

4. SCOPE OF PROCEDURES

This procedure applies to the University community, including Council members, students, staff, University Associates, Curtin controlled entities and all persons participating in University business or activities, including whether as a visitor, adjunct appointee, service provider, contractor or volunteer.

5. DEFINITIONS

(Note: Commonly defined terms are located in the [Curtin Common Definitions](#). Any defined terms below are specific to this document)

Personal information

Information (including information forming part of a database), and whether recorded in a material form or not, about an individual whose identify is apparent, or can reasonably be ascertained, from the information.

Staff personal information

Any personal information that relates to any person employed or previously employed by the University.

Student personal information

Any personal information that relates to any person currently or previously enrolled or graduated from the University.

Third-party personal information

Any personal information that relates to a third person who is not a staff member, student or client of the University.

6. SCHEDULES

Nil

7. RELATED DOCUMENTS/LINKS/FORMS

[Privacy Act 1988 \(Cth\)](#)

[Higher Education Support Act 2003 \(Cth\)](#)

[Freedom of Information Act 1992 \(WA\)](#)

[Curtin University's Privacy Statement](#)

Policy Compliance Officer	Annette Rooke , Information Disclosure Compliance Officer
Policy Manager	Chief Operating Officer
Approval Authority	Chief Operating Officer
Review Date	1 st April 2022

REVISION HISTORY

Version	Approved/ Amended/ Rescinded	Date	Committee / Board / Executive Manager	Approval / Resolution Number	Key Changes and Notes
P13.1	Approved	07/11/2001	Information Plan Advisory Committee	IPAC 54/01	Attachment 1 to Document No IPAC 49/01
	Administratively Updated	20/03/2008	Director, Legal and Compliance Services		Reformatted and Amended to Reflect Organisational Chart
	Amended	10/12/2008	Council	C 189/08	Attachment B to Confidential Document No 01286/08, Amended Responsibilities to Reflect Organisational Chart
	Amended	02/06/2009	Planning and Management Committee	PMC 47/09	Name Change from Staff Services to Human Resources
	Administratively Updated	17/06/2009	Director, Legal and Compliance Services		Responsibilities Updated
	Administratively Updated	16/10/2012	Director, Legal and Compliance Services		Policy Contact Updated
	Amended	07/04/2014	Vice President, Corporate Services	EM1401	Unconditional (formerly policy and procedures)
	Administratively Updated	18/12/2014	Director, Legal and Compliance Services		Change of Policy Contact
	Approved	03/03/2015	Vice President, Corporate Services	EM1501	Documented Updated
	Administratively Updated	20/04/2015	Director, Legal and Compliance Services		Director Human Resources changed to Director, People and Culture
	Approved	02/07/2018	Chief Operating Officer	EM1810	Unconditional