

<b>Policy Name</b>	<b>Privacy and Intellectual Property Policy</b>
<b>Policy Number</b>	G014
<b>Approval Authority</b>	Board of Directors
<b>Responsible Officer</b>	Director of Finance (APAC)
<b>Operational Responsibility</b>	Campus Director
<b>Purpose</b>	<p>This policy regulates how LCI Melbourne (LCIM) collects, manages, stores, and discloses the personal information of students, staff, clients, contractors, and visitors. It also governs the use of surveillance systems, including Closed-Circuit Television (CCTV), and the management of intellectual property assets generated through academic and professional activities at the institution.</p> <p>This policy supports LCIM's compliance with applicable Commonwealth and State legislation and aligns with the Higher Education Standards Framework (Threshold Standards) 2021, in particular Standards 2.3 (Wellbeing and Safety), 7.2 (Corporate Monitoring and Accountability), and 7.3 (Information Management).</p>
<b>Scope</b>	<p>This policy applies to all personal information collected, stored, used, disclosed (including cross-border), and disposed of by LCIM in relation to its staff, students, contractors, visitors, and other stakeholders.</p> <p>It applies to information collected directly or indirectly, including through surveillance systems such as CCTV, and governs the lawful and ethical handling of intellectual property created in connection with LCIM activities.</p>
<b>Policy Statement</b>	<p><b>Collection of Personal Information</b></p> <p>LCI Melbourne (LCIM) collects personal information as part of its student admissions, enrolment, academic delivery, staff employment, contractor agreements, and campus operations. This includes personal information obtained directly and indirectly, including through surveillance systems such as Closed-Circuit Television (CCTV).</p> <p>Information is only collected where it is reasonably necessary for the institution's academic, administrative, compliance, operational, or security purposes.</p> <p><b>Use of Personal Information</b></p> <p>LCIM uses personal information, including CCTV footage, solely for purposes directly related to the delivery of education and the management of its campus and community. These purposes include student and staff safety, compliance with legal obligations, the provision of student and academic services, and institutional administration.</p> <p>All use of personal information complies with relevant legislation, including the <i>Privacy Act 1988 (Cth)</i>, <i>Information Privacy Act 2000 (Vic)</i>, and associated Australian Privacy Principles (APPs).</p> <p><b>Health Information and Sensitive Data</b></p> <p>Where LCIM collects health-related personal information—such as medical certificates, psychological assessments, disability support documentation, or emergency contact health data—this information is managed in compliance with:</p>

	<ul style="list-style-type: none"> <li>▪ The <i>Health Records Act 2001 (Vic)</i>; and</li> <li>▪ The <i>Privacy Act 1988 (Cth)</i> and its Australian Privacy Principles.</li> </ul> <p>Health information is collected only when necessary to support academic adjustments, ensure student and staff wellbeing, meet workplace health and safety requirements, or fulfil legal obligations. Such information is treated as highly confidential, securely stored, and accessed only by authorised personnel for the intended purpose.</p> <p><b>Disclosure of Personal Information</b></p> <p>LCIM does not disclose personal information without the individual's consent unless required or authorised by law. This applies to all personal information, including sensitive information such as health or disability-related data. Disclosures may be made to:</p> <ul style="list-style-type: none"> <li>▪ Government departments or regulatory authorities (e.g., TEQSA, Department of Education, Department of Home Affairs)</li> <li>▪ Legal representatives or auditors acting on behalf of LCIM</li> <li>▪ Emergency services or health professionals in circumstances involving a serious threat to an individual's life, health, or safety</li> <li>▪ Courts, tribunals, or law enforcement agencies under lawful direction or subpoena</li> </ul> <p><b>Cross-Border Disclosure</b></p> <p>LCIM may disclose personal information, including CCTV footage, to the LCI Education global network or international headquarters. Where this occurs:</p> <ul style="list-style-type: none"> <li>▪ LCIM will take reasonable steps to ensure overseas recipients uphold privacy protections substantially similar to those required under the Australian Privacy Principles (APP 8).</li> <li>▪ If equivalent protections cannot be guaranteed, LCIM will seek the individual's informed consent prior to disclosure, unless an exemption under the Privacy Act applies.</li> </ul> <p><b>Access to and Correction of Personal Information</b></p> <p>Individuals have the right to access their personal information held by LCIM, including any CCTV footage in which they are reasonably identifiable, subject to lawful exemptions.</p> <p>Requests to correct inaccurate, incomplete, or outdated personal information will be addressed in accordance with privacy legislation.</p> <p><b>Use of Closed-Circuit Television (CCTV)</b></p> <p>LCIM operates CCTV on campus to support a safe and secure environment for students, staff, and visitors. The following principles apply:</p> <ul style="list-style-type: none"> <li>▪ CCTV surveillance is overt and accompanied by appropriate signage.</li> <li>▪ Surveillance is not used in areas where individuals have a reasonable expectation of privacy (e.g., bathrooms, change rooms).</li> <li>▪ Access to CCTV footage is restricted to authorised personnel and used only for safety, compliance, or legal purposes.</li> <li>▪ Footage is securely stored and retained only as long as necessary.</li> </ul> <p>LCIM's use of CCTV complies with the <i>Surveillance Devices Act 1999 (Vic)</i>, <i>Surveillance Devices Act 2004 (Cth)</i>, and the <i>Privacy Act 1988 (Cth)</i>.</p>
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	<p><b>Intellectual Property at LCIM</b></p> <p>LCIM recognises intellectual property (IP) as a key institutional asset that supports learning, teaching, research, and creative practice. This policy outlines how IP is owned, used, and protected in relation to staff, students, and external collaborators.</p> <p><b>Staff and Contractor Intellectual Property</b></p> <p>LCIM, as the employer or commissioning body, owns all IP created by employees or contractors during the course of their work or using LCIM resources. This includes:</p> <ul style="list-style-type: none"> <li>▪ Curriculum, teaching and learning materials</li> <li>▪ Digital works and media assets</li> <li>▪ Administrative documentation</li> <li>▪ Works created at LCIM's direction</li> </ul> <p>Exceptions are detailed in the Privacy and Intellectual Property Procedure.</p> <p><b>Student Intellectual Property</b></p> <p>Students retain ownership of IP created independently during their studies, unless:</p> <ul style="list-style-type: none"> <li>▪ The work is produced as part of an LCIM-initiated collaboration or joint project; or</li> <li>▪ A specific agreement outlines shared or institutional ownership. Exceptions and licensing terms are defined in the related Procedure.</li> </ul> <p><b>External Stakeholders and Commissioned Works</b></p> <p>External consultants or creators engaged by LCIM are subject to contract terms that treat outputs as commissioned works for LCIM. Ownership and usage rights follow the same principles applied to staff-generated content, unless otherwise agreed in writing.</p> <p><b>Indigenous Cultural and Intellectual Property (ICIP)</b></p> <p>LCIM respects the rights of Aboriginal and Torres Strait Islander peoples to protect and manage their Indigenous Knowledge. In contexts involving ICIP, LCIM commits to:</p> <ul style="list-style-type: none"> <li>▪ Obtaining appropriate consultation, permissions, and consent</li> <li>▪ Recognising ownership and cultural protocols</li> <li>▪ Upholding the principles of Control, Protection, Recognition and Respect, as advised by IP Australia</li> </ul>
<p><b>Relevant Legislation</b></p>	<p><b>Commonwealth Legislation</b></p> <ul style="list-style-type: none"> <li>▪ <a href="#">Privacy Act 1988 (Cth)</a></li> <li>▪ <a href="#">Surveillance Devices Act 2004 (Cth)</a></li> <li>▪ <a href="#">Higher Education Support Act 2003</a></li> <li>▪ <a href="#">Education Services for Overseas Students Act 2000</a></li> <li>▪ <a href="#">Australian Human Rights Commission Act 1986</a></li> <li>▪ <a href="#">Educational Services (Post-Secondary Education) Award 2020</a></li> <li>▪ <a href="#">Tertiary Education Quality and Standards Agency Act 2011</a></li> <li>▪ <a href="#">Higher Education Standards Framework (Threshold Standards) 2021</a></li> <li>▪ <a href="#">My Health Records Act 2012 (Cth)</a></li> </ul> <p><b>Victorian Legislation</b></p> <ul style="list-style-type: none"> <li>▪ <a href="#">Information Privacy Act 2000 (Vic)</a></li> </ul>

	<ul style="list-style-type: none"> <li>▪ <a href="#">Surveillance Devices Act 1999 (Vic)</a></li> <li>▪ <a href="#">Health Records Act 2001 (Vic)</a></li> </ul>
<b>Key Related Documents</b>	<ul style="list-style-type: none"> <li>▪ G014 Privacy and Intellectual Property Procedure</li> <li>▪ G015 Employee Code of Conduct</li> <li>▪ G002 Student Code of Conduct</li> <li>▪ G018 Access and Equity Policy and Procedure</li> <li>▪ A003 Academic Integrity Policy and Procedure</li> <li>▪ G013 Marketing Policy and Procedure</li> <li>▪ G008 Employee Grievance and Dispute Resolution Policy and Procedure</li> <li>▪ G016 Student Grievances and Complaints (Non Academic) Policy and Procedure</li> </ul>

Date Approved	28 May 2024		
Date of Commencement	28 May 2024		
Date for Review	M2 2027		
Documents superseded by this Procedure	Records Management Policy 2017 Intellectual Property Policy 2017		
Amendment History	New Policy and Procedure		
Signed and dated for LCIM	Professor Warren Bebbington	Mtg 2 2024 BoD minutes	28 May 2024

INFORMATION FOR PUBLISHING ON POLICY REGISTER				
Policy/Procedure Category		Governance		
Responsible Officer		Dean		
Stakeholders		Board of Directors Marketing Team Admissions Team Global Admissions – LCI Network International Agents Leadership Team Employees		
Review Date		M2 2027		
Approved by Board of Directors		M3 2025		
Change and Version Control				
Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.0	Dean and Principal	New Policy and Procedure	15 <sup>th</sup> February 2022	15 <sup>th</sup> February 2022
2.0	Dean	Updated Policy and Procedure – Compliance	28 May 2024	28 May 2024
3.0	Campus Director	Updated Policy	27 August 2025	27 August 2025