

Procedure Name	Privacy and Intellectual Property Procedure
Procedure Number	G014
Approval Authority	Board of Directors
Responsible Officer	Director of Finance (APAC)
Operational Responsibility	Director of Studies
Purpose	This procedure outlines how LCI Melbourne (LCIM) implements the Privacy and Intellectual Property Policy. It details the operational processes for collecting, managing, using, disclosing, and securing personal information (including health information and CCTV data), and the management of intellectual property generated by staff, students, and external contributors.
Scope	This procedure applies to all aspects of personal information for staff, students, contractors, and stakeholders of LCIM, including the collection, storage, use, disclosure (including cross-border), and disposal of such information. It also covers the handling of intellectual property, including Indigenous Cultural and Intellectual Property (ICIP), and data collected through CCTV systems installed across the campus for safety and operational purposes.
Procedure Statement	<p>Collection of Personal Information Only personal information that is necessary for academic, operational, administrative, security, legal, or wellbeing purposes will be collected as part of student admissions and enrolment processes, staff recruitment and induction, or contractual engagement with external parties. All information is collected in accordance with relevant legislation.</p> <p>Storage of Personal Information All personal information and data are stored in secure systems and physical or digital locations. The retention period is informed by applicable legislation and regulatory requirements. This includes:</p> <ul style="list-style-type: none"> ▪ CCTV footage, stored securely with restricted access by authorised personnel only. ▪ Health-related information, treated as sensitive and confidential, managed in line with the Health Records Act 2001 (Vic). <p>Access to Personal Information Staff and students have the right to access their personal information, including health records and CCTV footage in which they are reasonably identifiable, subject to lawful exemptions. Requests must be made in writing to the Campus Director or Director of Finance.</p> <ul style="list-style-type: none"> ▪ Staff can update personal information via Dayforce or by contacting their line manager. ▪ Students should submit update requests in writing to the Student Experience Manager. <p>Where personal information is disclosed across international borders (e.g., to LCI Education headquarters), LCIM ensures reasonable steps are taken to protect this data in accordance with APP 8.</p> <p>Confidentiality and Commercial-in-Confidence</p>

All staff and students must maintain strict confidentiality regarding the business of LCIM, including information related to the Academic Board, Board of Directors, staff, students, suppliers, and teaching materials. This obligation extends to all documents marked as confidential or commercial-in-confidence.

Intellectual Property at LCIM

Staff and Contractor Intellectual Property

LCIM, as the employer or commissioning body, owns all intellectual property created by employees or contractors in the course of their duties or using institutional resources. This includes:

- Curriculum and teaching materials
- Digital and media works
- Administrative content
- Works produced at LCIM's direction or funded by LCIM

Copyright in scholarly or artistic works remains with the creator unless the work is commissioned, created under contract, or developed using significant institutional resources. Any such arrangements must be agreed in writing.

Student Intellectual Property

Students retain ownership of work they create independently during their studies unless:

- The work is developed as part of an LCIM-initiated joint project or collaborative program; or
- A specific agreement outlines shared or institutional ownership.

Participation in collaborative projects involving IP assignment is voluntary and transparent. Students may decline to participate without penalty.

External Stakeholders and Commissioned Works

Work created by external parties under contract is considered commissioned work for LCIM, and IP ownership follows the same rules as for employee-generated work. Where exceptions apply, they must be documented and agreed prior to the commencement of the engagement.

Indigenous Cultural and Intellectual Property (ICIP)

LCIM recognises and respects the rights of Aboriginal and Torres Strait Islander peoples to protect, control, and benefit from their cultural knowledge and intellectual property. In any context involving ICIP, LCIM commits to:

- Obtaining informed consent and appropriate permissions
- Respecting cultural protocols
- Ensuring fair attribution and recognition
- Upholding the principles of Control, Protection, Recognition and Respect, as advised by IP Australia

Moral Rights

LCIM acknowledges the creator's moral rights, including the right to be identified as the author of intellectual property and the right to object to derogatory treatment of that work. All reasonable steps will be taken to respect and protect these rights.

Grievances with Privacy or Intellectual Property Issues

Individuals may raise concerns or complaints regarding breaches of privacy or the mismanagement of intellectual property. LCIM will respond to such complaints in accordance with the following procedures:

	<ul style="list-style-type: none"> ▪ Students: Student Grievances and Complaints Resolution (Non-Academic) Policy and Procedure ▪ Staff: Employee Grievance and Dispute Resolution Policy and Procedure <p>Complaints relating to Indigenous Cultural and Intellectual Property will be handled with cultural sensitivity and in consultation with relevant First Nations stakeholders.</p>
Relevant Legislation	<p>Commonwealth Legislation</p> <ul style="list-style-type: none"> ▪ Privacy Act 1988 (Cth) ▪ Surveillance Devices Act 2004 (Cth) ▪ Higher Education Support Act 2003 ▪ Education Services for Overseas Students Act 2000 ▪ Australian Human Rights Commission Act 1986 ▪ Educational Services (Post-Secondary Education) Award 2020 ▪ Tertiary Education Quality and Standards Agency Act 2011 ▪ Higher Education Standards Framework (Threshold Standards) 2021 ▪ My Health Records Act 2012 (Cth) <p>Victorian Legislation</p> <ul style="list-style-type: none"> ▪ Information Privacy Act 2000 (Vic) ▪ Surveillance Devices Act 1999 (Vic) ▪ Health Records Act 2001 (Vic)
Key Related Documents	<ul style="list-style-type: none"> ▪ G014 Privacy and Intellectual Policy ▪ G015 Employee Code of Conduct ▪ G002 Student Code of Conduct ▪ G018 Access and Equity Policy and Procedure ▪ A003 Academic Integrity Policy and Procedure ▪ G013 Marketing Policy and Procedure ▪ G008 Employee Grievance and Dispute Resolution Policy and Procedure ▪ G016 Student Grievances and Complaints Resolution Non Academic Policy and Procedure

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	MTG1 2022 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
Noted by Board of Directors	28 May 2024
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 th February 2022	15 th February 2022
2.0	Dean	Updated to Policy and Procedure	28 May 2024	28 May 2024
3.0	Campus Director	Updated Policy and Procedure	27 August 2025	27 August 2025