

ARC Privacy Policy

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Policy

1. It is a requirement of the *Privacy Act 1988* (the Act) that entities bound by the Australian Privacy Principles (APPs) have a privacy policy. The APPs are set out in [Schedule 1 of the Act](#).
2. This policy outlines the personal information handling practices at the Australian Research Council (ARC) and provides general information about the purposes for which the ARC will collect, use, and disclose an individual's personal information. This policy applies to all individuals involved in or with the ARC.
3. The ARC will update this policy as necessary to ensure that it continues to meet its obligations under the Act.

Definitions

Personal Information

4. In this policy, personal information has the same meaning as defined in subsection 6(1) of the Act.

Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

Sensitive information

5. In this policy, sensitive information (a subset of personal information) has the same meaning as defined in subsection 6(1) of the Act.
6. Sensitive information means:
 - (a) Information or an opinion about an individual's:
 - (i) racial or ethnic origin; or
 - (ii) political opinions; or
 - (iii) membership of a political organisation; or
 - (iv) religious beliefs or affiliations; or
 - (v) philosophical beliefs; or
 - (vi) membership of a professional or trade association; or
 - (vii) membership of a trade union; or
 - (viii) sexual orientation or practices; or
 - (ix) criminal record;that is also personal information; or
 - (b) health information about an individual; or
 - (c) genetic information about an individual that is not otherwise health information; or
 - (d) biometric information about an individual that is not otherwise health information; or
 - (e) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
 - (f) biometric templates.

Collection of your personal information

7. The ARC collects personal and sensitive information directly from you or your authorised representative in the course of performing the ARC's functions and activities.
8. Some of the personal information collected by the ARC may include:
 - (a) title
 - (b) name
 - (c) date of birth
 - (d) tax file number
 - (e) curricula vitae or resume
 - (f) current employment, employment history, expertise, fields of research and qualifications
 - (g) gender
 - (h) racial or ethnic origin
 - (i) citizenship, residency status and cultural background
 - (j) disclosures of interest, such as, conflicts of interest, foreign support and associations
 - (k) research grant and research publication history
 - (l) details of research misconduct or fraud
 - (m) commercial in confidence information
 - (n) Australian Business Number (ABN), and

- (o) any other information provided by you to us, including where you have permitted others to do so on your behalf.

How and why, we collect your personal information

9. The ARC collects information through a variety of channels. This includes through:
 - (a) applications relating to research projects or grant funding programs submitted by you, or others on your behalf;
 - (b) recruitment processes conducted by the ARC to employ staff;
 - (c) your profile on, and use of, the ARC's Research Management System (RMS), such as, to apply for grant funding, including, where you permit others to do so on your behalf;¹
 - (d) emails and other forms of correspondence that you have with the ARC;
 - (e) publicly accessible information, including, social media, other services or platforms that you might use to engage with the ARC;
 - (f) universities, other educational institutions, associations or organisations with whom you may be associated with;
 - (g) other Commonwealth entities; and
 - (h) other third parties (such as a respondent to a consultation request, expression of interest (EOI) or request for tender that may be issued by the ARC).
10. We collect personal information about you when it is reasonably necessary for, or directly related to, one or more of our functions or activities ('ARC purposes'). We also collect personal information about you when you consent to us doing so (which may also include 'non-ARC purposes,' such as, Countering Foreign Interference (CFI) and national security sharing of information between Commonwealth entities² and where those entities may not have a role in the relevant program or legislative compliance).

Use and disclosure of your personal information

11. The ARC may disclose your personal information to other Commonwealth entities³ and third parties (including overseas recipients) for the purposes that the ARC collected it, for related purposes, where you would reasonably expect us to disclose the personal information and/or where you have consented for us to do so. Where the ARC may also disclose your personal information to other Commonwealth entities and third parties (including overseas recipients) for ARC purposes and non-

¹The ARC's role with RMS includes the ARC hosting RMS for ARC's Policy Partners, with these Policy Partner's including various Commonwealth entities. All of the information in RMS is "held" by the ARC for the purposes of the Act and the *Freedom of Information Act 1982* (Cth) (FOI Act); and some of the information in RMS (such as application forms and submitted applications) is also held by the relevant Policy Partner. As explained in ARC grant opportunity guidelines, some personal information provided by individuals in RMS may be used to assess applications, may be visible to the ARC and other users of RMS (including being accessible overseas) and will also be used as part of the ARC's evaluation of the program as a whole.

² Generally, Commonwealth entities and companies are government bodies that are subject to the [Public Governance, Performance and Accountability Act 2013](#) (the PGPA Act). See [PGPA Act Flipchart and List | Department of Finance](#).

³ Where the ARC refers to 'Commonwealth entities' in this Privacy policy this is taken to include all Australian Government entities, including, States and Territories. For example, where the ARC works with Universities across Australia, who are mostly statutory authorities with *Enabling Acts* or *Acts of Parliament* - which both allow Universities to operate and inform their purpose and mission in their respective States and Territories (*except ANU which is Commonwealth), together with governing bodies that generally are made up of appointments by State or Territory Governments, Governors of the State, alongside external members selected by the governing body. Universities have different requirements built into their State or Territory *Enabling Acts* or *Acts of Parliament* - which both allow Universities to operate and inform their purpose and mission. Further, Universities are subject to Commonwealth legislation, such as, in their operation, student support and management, research and funding.

ARC purposes, concerning non-ARC purposes this will include consideration by us to instances where you have consented to us doing so.

12. Some of the purposes where the ARC may use and disclose your personal information include to:

- (a) assess, consider, make decisions in respect of and report on funding of research projects;
- (b) administer, manage and evaluate research grants and other Commonwealth funds that we are responsible for;
- (c) conduct due diligence, (including national security, CFI, research security and integrity checks) and other checks that may inform, impact, assess, evaluate or otherwise relate to our funding or support of research projects;
- (d) comply with our reporting obligations (for example, to publish grant information on GrantConnect, respond to audits and to report information to the Australian Taxation Office (ATO));
- (e) share it with other Commonwealth entities to support government administration, grant administration, legislative compliance, research evaluation, data analysis, service delivery, due diligence, research integrity, research security or other checks, by either the ARC or those other Commonwealth entities; and
- (f) contribute to reports on whole of Australian government research evaluation and activity.

13. The ARC will not be taken to have breached its privacy obligations to the extent that personal information is disclosed:

- (a) by the ARC to its 'advisors' (including, assessors, such as, peer reviewers and assessment committee members), officers, employees or other third parties in order to assess, evaluate or verify submissions to the ARC
- (b) to Commonwealth entities and third parties to enable effective administration, legislative compliance, due diligence activities (including, national security, CFI and research integrity), auditing of the National Competitive Grants Program (NCGP) or any other functions or activities conducted by the ARC (including non-ARC purposes where the ARC is permitted to do so)
- (c) for a purpose directly related to the enforcement or investigation of a possible breach of any Commonwealth, State, Territory or local law
- (d) to the Minister and ministerial staff, or in response to a demand by a House or a Committee of the Commonwealth Parliament
- (e) within the ARC, or to another Commonwealth agency, department or entity, where this serves the Commonwealth's legitimate interests
- (f) as authorised or required by law
- (g) in accordance with any provisions in Grant Guidelines, Grant Agreements, including accompanying documentation, individual certifications, applications, proposals, Expressions of Interest (EOIs) and as entered by individual/s or an individual/s behalf into RMS
- (h) is in the public domain
- (i) with the consent of the relevant individual to whom the personal information relates, and

- (j) to comply with obligations or to exercise rights under the *ARC Research Integrity Policy*.

Access to ARC records and your personal information

14. Access to ARC records and to your personal information is limited to those who have legislative or operational authority, including:
- (a) the ARC Board, ARC CEO, ARC staff, advisors and individuals involved in ARC functions and activities, such as, review, evaluation, assessment processes and management of funding
 - (b) contractors and professional service providers to the ARC
 - (c) members of the Australian Research Integrity Committee (ARIC)
 - (d) other Commonwealth entities, legal, due diligence, security, integrity and audit oversight bodies where provision of the personal information is required or otherwise permitted
 - (e) ARC People, ARC Finance, ARC Programs and relevant ARC Services teams.
15. If you are involved in or engaging with the ARC, such as, a committee member, reviewer, researcher, advisor, employee, or contractor, you are responsible for reading and ensuring that you understand this policy.

Anonymity and pseudonymity

16. While you can ask the ARC to deal with you anonymously or pseudonymously, in most cases the ARC will reasonably require your contact details in order to fulfil its functions.

Commonwealth Grants Rules and Principles (CGRPs)

17. In accordance with the [Commonwealth Grants Rules Principles \(CGRPs\)](#), the name of grant recipients, the amount of the grant, the grant scheme and a recipient's organisation (i.e., university as the Administering Organisation) will be published and as otherwise set out at [Grants Search - Grants Data Portal](#).

Storage and Security

18. The ARC takes the following steps to protect your personal information:
- (a) ensuring our premises are subject to secure access requirements;
 - (b) controlling and monitoring system access;
 - (c) enabling system access only through authenticated credentials;
 - (d) limiting access to personal information to a 'need to know' basis and only by authorised staff;
 - (e) regular monitoring, updating and auditing of our storage system.
19. In accordance with the Act and the *Archives Act 1983*, personal information is destroyed in a secure manner, archived, or deleted when it is no longer required.

20. Where the ARC also collects and holds some data for other Commonwealth entities.⁴ The user details are kept in a common user data basis where the data may not be kept separate to our own data. 'Components' are protected with strict access controls. In certain instances, information may be in application form and we may not have control over this data. For example, how other Commonwealth entities use that information may be in accordance with their controls and Privacy policies.
21. If we receive a request, feedback or a complaint about data that we collect or hold for another Commonwealth entity, we will send it to that other Commonwealth entity.

Accessing and correcting your personal information

22. Under the Act, you have a right to request:
- (a) access to personal information that we hold about you; and
 - (b) that we correct personal information that we hold about you, if you believe it is inaccurate or out of date.
23. If you ask, we must give you access to your personal information and take reasonable steps to correct it if it is incorrect, unless there is a law that allows or requires us not to.
24. We will notify you in writing and explain our reasons if we refuse to give you access to, or correct, your personal information.
25. Please contact the ARC Privacy Officer on (02) 6287 6600 or via email to privacy@arc.gov.au. More information is accessible concerning documents containing your personal information at [Privacy Policy | Australian Research Council](#) and [Freedom of Information | Australian Research Council](#).

Collection of unsolicited information

26. Sometimes personal information is not sought by the ARC but is delivered or sent to the ARC by either the individual or a third party without the ARC having requested it. This information is considered 'unsolicited'. Where unsolicited information is received by the ARC, the ARC will, within a reasonable period, determine whether that information is directly related to one or more of the ARC's functions or activities. If this cannot be determined, the ARC may, as soon as practicable and in accordance with the *Archives Act 1983* (Archives Act) and the Act, destroy or de-identify the information.
27. If this can be determined, the ARC will notify you of the purpose of collection and the ARC's intended uses and disclosures according to the requirements of the Act, including the APPs, unless it is impracticable or unreasonable for the ARC to do so.
28. The ARC position is generally to remind individuals to avoid providing personal information about themselves or others because this will assist the ARC in avoiding the collection of unnecessary personal information. Examples of where this can occur can include in a response to a survey with free text fields, in a submission process, application or proposal for grant funding, where this may contain information about an identified individual or a reasonably identifiable individual. You will need to consider how readily an individual could be identified from the information you provide in such responses to determine whether it may contain personal information.

⁴ For further information see [Research Grants Services | Australian Research Council](#) as of 8 February 2026.

Privacy complaints

29. If you wish to complain that the ARC has breached the Act or one or more of the APPs you can contact the ARC's Privacy Officer on (02) 6287 6600 or via email to privacy@arc.gov.au.
30. The ARC will aim to respond to your complaint promptly to acknowledge receipt and outline a timeframe in which you can expect to be provided with a substantive response by us in writing.
31. If you are not satisfied with the ARC's response you may refer your complaint to the [Office of the Australian Information Commissioner \(OAIC\)](#).

Contact details

Australian Research Council

Phone: 02 6287 6600

privacy@arc.gov.au

www.arc.gov.au

Level 4, West Wing Discovery House

47 Bowes Street, Woden ACT 2606

GPO Box 2702, Canberra ACT 2601

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POLICY SPONSOR: Chief Operating Officer (COO)

POLICY OWNER / CONTACT: General Counsel

AMENDMENT HISTORY: Version 0.1: 25 February 2022

Version 0.2: 19 December 2024 minor updates to reflect current structure of ARC and the Act requirements.

Version 0.3: 8 February 2026– updates to clarify the scope of the policy, including potential use and disclosure of personal information for ARC purposes and non-ARC purposes, where the ARC is permitted to do so.