

Institution	Universal English (UE)
Policy Name	Privacy Policy and Procedure

1. Scope

This Policy and Procedure applies to all staff, contractors, all prospective, current, and former students of UE, as well as individuals involved in the collection or management of personal information at UE, including staff and contractors.

2. Purpose

This Policy and Procedure outlines UE’s approach to using and managing personal information collected by the institution, ensuring that UE fulfils its legal and ethical obligations concerning the collection, storage, and disclosure of personal information related to individuals.

3. Regulatory Alignment

This Policy is developed and implemented to comply with the regulatory requirements informed in the:

- Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs)
- Privacy and Data Protection Act 2014 (Vic)
- Freedom of Information Act 1982 (Cth)
- Privacy (Tax File Number) Rule 2015

4. Policy Principles

4.1 UE upholds the standards of privacy and data protection in accordance with the relevant legislative and regulatory requirements and ensures that personal information is collected, used, stored and disclosed responsibly, securely, and transparently. To achieve this commitment, UE:

- a. Develops and maintains a comprehensive Privacy Policy and Procedure that aligns with applicable legal and regulatory requirements;
- b. Ensures that all personal information collected is relevant, accurate, and used solely for legitimate purposes related to the delivery of education and associated services;
- c. Protects personal information against unauthorised access, misuse, loss, and disclosure through robust security measures and regular system audits;
- d. Provides clear communication to students about how their personal information is collected, used, and managed;
- e. Allows students and staff to access and correct their personal information where necessary; and
- f. Provides ongoing training to staff to ensure compliance with privacy obligations.

- 4.2 UE ensures its commitment to privacy is transparent and accessible. The Privacy Policy and Procedure is available on the UE website and is communicated to students and staff during orientation and induction processes. Additionally, a privacy statement is prominently published on the UE website and included in all written agreements applicable. This ensures that all stakeholders are informed of UE's privacy practices and their rights regarding personal information.
- 4.3 UE maintains records of personal information about all individuals involved in any business activities with the institution. UE collects, holds, uses and discloses information from students, staff and contractors for various purposes, including but not limited to:
- a. Delivering services to clients;
 - b. Managing employees and contractors;
 - c. Promoting products and services;
 - d. Carrying out internal business functions and activities; and
 - e. Meeting regulatory requirements.
- 4.4 UE takes reasonable steps to ensure that the personal information it collects is accurate, complete and up to date. To assist UE in this task and to ensure the quality and accuracy of the information that UE holds, individuals are encouraged to update their information from time to time. All international students are required to notify UE of any changes to their address and contact details as soon as possible. International students must do so within 7 days, as mandated by their visa conditions.
- 4.5 UE's information and databases are private and confidential. Personal information is stored securely within UE's systems and protected against misuse, interference, loss, unauthorised access, modification, or disclosure. Wherever possible, personal information collected and held by UE will only be accessed and handled as required by staff authorised to do so for the purpose of carrying out their duties.
- 4.6 When personal information is shared with the third parties listed in Sections 4.11 and 4.14, the handling and use of that information will be governed by the third party's privacy policy. UE is not responsible for any misuse of the data once it has been transferred to the third party.
- 4.7 In all instances where access to personal information is requested, UE will ensure:
- a. The identity of requesting parties is thoroughly verified and vetted;
 - b. Where legally permissible, the individual whose information is being requested will be contacted to confirm their consent (if prior consent has not been provided); and
 - c. Access is granted only to appropriately authorised parties with valid and legitimate purposes.
- 4.8 Individuals can consult the Complaints and Appeals Policy and Procedures to address concerns related to their personal information or potential privacy breaches by UE. If the issue remains unresolved, they may escalate their concerns to the Office of the Australian Information Commissioner, as outlined in the Complaints and Appeals Policy and Procedure.

Student Personal Information

4.9 UE collects student personal information solely for purposes related to enrolment and the delivery of educational services, including:

- a. Responding to student inquiries and requests;
- b. Maintaining communication records to fulfill legal, regulatory, and operational responsibilities;
- c. Protecting UE and its students from fraud and other unlawful activities;
- d. Recording and tracking students' academic progress;
- e. Processing payments and preventing fraudulent transactions;
- f. Providing information about relevant services and events via email, web, text, social media, and telephone;
- g. Sending legally required communications or updates about changes to UE's services; and/or
- h. Complying with contractual or legal obligations that may require sharing personal information.

4.10 UE only collects the personal information necessary to deliver its services. The information collected may include the following details about students:

- a. Name;
- b. Address;
- c. Telephone number(s);
- d. Date of birth;
- e. Gender;
- f. Citizenship;
- g. Passport details;
- h. Visa information;
- i. Identity card;
- j. Emergency contact details;
- k. Bank account or financial information;
- l. Educational history, including qualifications, academic records, transcripts, and English proficiency certificates; and/or
- m. Disabilities or other health-related information.

4.11 UE's student personal information may only be disclosed under the following circumstances:

- a. To the Australian Government and authorised entities when legally required, including:
 - i. Department of Education, Skills and Employment
 - ii. Department of Home Affairs
 - iii. Tuition Protection Service
 - iv. Australian Skills Quality Authority
 - v. State and Federal Police
 - vi. External complaints or dispute resolution agencies handling student complaints
 - vii. Educational agents

- viii. UE's contracted and professional service providers offering services to students, such as banks, IT providers, and health insurance companies;
- b. If there are reasonable grounds to believe the disclosure is necessary to prevent or reduce a serious and imminent threat to the life or health of the student or others;
- c. To external debt collection agencies for recovering overdue tuition or non-tuition fees;
- d. To UE's legal advisers or other professional consultants engaged by UE;
- e. To any third party where the student has provided explicit consent, such as employment verification organizations or other educational institutions;
- f. To UE's parent company, Universal Learning Group (ULG), and ULG's parent company, Oxford International Education Group (OIEG), located in the United Kingdom, for legitimate operational purposes. OIEG handles personal information in compliance with the UK General Data Protection Regulation (GDPR); and/or
- g. As otherwise required by law.

Staff Personal Information

4.12 UE collects staff personal information solely for purposes related to employment and the efficient management of its operations, including:

- a. Responding to staff inquiries and requests;
- b. Maintaining communication records to fulfill legal, regulatory, and operational responsibilities;
- c. Protecting UE and its staff from fraud and other unlawful activities;
- d. Managing payroll and employment entitlements, such as leave and benefits;
- e. Supporting professional development and performance evaluations;
- f. Managing compliance with work-related matters, where applicable; and/or
- g. Complying with contractual or legal obligations that may require sharing personal information.

4.13 UE only collects the personal information necessary for employment purposes. The information collected may include the following details about staff:

- a. Name;
- b. Address;
- c. Telephone number(s);
- d. Date of birth;
- e. Gender;
- f. Citizenship;
- g. Passport details;
- h. Visa information (if applicable);
- i. Tax file number;
- j. Emergency contact details;
- k. Bank account or financial information for payroll purposes;
- l. Employment history, including qualifications, previous positions, and professional certifications;
- m. Performance and training records; and/or

- n. Disabilities, health-related information, or medical certificates necessary for workplace accommodations or compliance with legal obligations.

4.14 UE's staff personal information may only be disclosed under the following circumstances:

- a. To the Australian Government and authorised entities when legally required, including:
 - i. Australian Taxation Office
 - ii. WorkSafe or equivalent workplace safety agencies
 - iii. State or Federal Police If there are reasonable grounds to believe the disclosure is necessary to prevent or reduce a serious and imminent threat to the life or health of the staff member or others
 - iv. External complaints or dispute resolution agencies handling workplace complaints
 - v. UE's contracted and professional service providers offering employment-related services, such as payroll, IT support, or insurance providers;
- b. To UE's legal advisers or other professional consultants engaged by UE;
- c. To any third party where the staff member has provided explicit consent, such as employment verification organisations;
- d. To UE's parent company, Universal Learning Group (ULG), and ULG's parent company, Oxford International Education Group (OIEG), located in the United Kingdom, for legitimate operational purposes. OIEG handles personal information in compliance with the UK General Data Protection Regulation (GDPR); and/or
- e. As otherwise required by law.

5. Procedure

Personal Information Collection and Update

- 5.1 UE gathers student personal information via the Application Form during the admissions process. This information is verified and updated during the orientation process using the Enrolment Form, as well as through other enrolment variation and academic matter forms throughout the student's course of study.
- 5.2 All students are required to sign a declaration confirming their understanding and agreement to the use and appropriate disclosure of their personal information, as part of their application and written agreement with UE.
- 5.3 Students can request access to their personal information by reaching out to the reception staff on campus. For verification purposes, students will be required to provide their previous contact details before any updates are made to the records. Accessing personal information is free of charge for students.
- 5.4 Students can also request updates to their personal information in case of any changes by submitting the Change of Personal Information Form to reception@ulgroup.com.au. Once a request is received, the updates will be made to the Student Management System within five working days.

Publication of Personal Information

- 5.5 UE will not publish any personal information without the student's consent.
- 5.6 The signed student declaration in the Application Form and the Letter of Offer and Acceptance authorises UE and its representatives to use student information to enhance UE's products and services.
- 5.7 Students who provide UE with consent to use their personal information retain the right to withdraw that consent at any time.

Storage and Security of Personal Information

- 5.8 UE ensures the secure management of personal information through effective storage, security measures, and monitoring. Personal information is promptly converted to electronic formats and stored in secure, password-protected systems, including financial, learning, and student management systems. Access to these systems is restricted to authorised personnel based on their specific roles, with comprehensive security measures, virus protection, backup procedures, and continuous monitoring in place.
- 5.9 Paper-based records are securely destroyed as soon as practicable using shredding and destruction facilities at UE sites. Individual records across systems are linked via a unique UE identification number to ensure consistency and accuracy.
- 5.10 Student records that are no longer required are appropriately destroyed in compliance with relevant legislative requirements. In the event that UE ceases operations, the required personal information of individuals enrolled in courses will be transferred to the appropriate regulatory authority, as mandated by law.
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Complaints and Appeals

- 5.12 If a student has a complaint or wishes to appeal a UE decision related to their privacy or personal information, the UE Complaints and Appeals Policy and Procedures will apply.
- 5.13 If a student remains dissatisfied with UE's response to their appeal, they may file a complaint with the Office of the Australian Information Commissioner. Further information is available at <https://www.oaic.gov.au/privacy/privacy-complaints/>, as outlined in the Complaints and Appeals Policy and Procedure.

Version History

It is the joint responsibility of the Implementation Officer and Responsible Officer to ensure compliance with this policy.

Responsible Officer	Managing Director		
Implementation Officers	Academic Manager, Admissions Manager		
Review Date	1 April 2028		
Approved by			
Managing Director			
Associated Documents			
Attendance Monitoring Policy and Procedure Application Form Change of Personal Information Form Complaints and Appeals Policy and Procedure Course Progress Policy and Procedure Critical Incident Policy and Procedure Deferment, Suspension and Cancellation Policy and Procedure Enrolment Form Fees and Charges Policy and Procedure International Admissions Policy and Procedure Letter of Offer and Acceptance Provider Default and Tuition Protection Policy and Procedure Refund Policy and Procedure			
Version	Brief Description of the changes	Date Approved	Effective Date
1.2		23 May 2024	23 May 2024
2.0	<ul style="list-style-type: none"> Updated the document in the unified policy template Update the title from Privacy Policy and Privacy Policy and Procedure Revised the policy principles to better align with the specific needs of the institution 	1 April 2025	1 April 2025