Information & Privacy Policy and Procedure

Purpose

The purpose of this document is to set out the policy and procedure adhered to by Universal Education Centre Pty Ltd (trading as Universal English College and herein referred to as "UEC" or "the college") and its staff with respect to the gathering, management, retention, sharing, reporting, and disseminating of information from/to/about prospective, current and or past students and/or its operations.

The core principle of this policy is to confirm that UEC will ensure that it complies with all legislative and regulatory requirements, particularly those set out in the ESOS framework, including those set out in the ESOS Act Sections 19 and 21, in the ESOS Regulations Section 3, in the Standards 3, 5, and 10 of the National Code, and Standards 4 and 8 of the Standards for RTOs.

In any activity or decision pertaining to the gathering, management, retention, sharing, and disseminating of information, UEC prioritises compliance with its legal obligations, the protection of the rights of students, and the protection of the reputation of UEC and of the Australian international education industry as a whole.

Scope

This document and the policy and procedure set out in it apply to all activities related to the gathering, management, retention, sharing, reporting, and disseminating of information by UEC, its officers and staff, and any relevant third parties.

This document and the policy and procedure set out in it exist in the context of all other UEC policy and procedure documentation. Due to the nature of this policy, it has implications for and is impacted by all other UEC policies and procedures. This means that on many occasions this document must be read, understood, and acted upon in the context of those other policies and procedures. In particular, however, this document must be read in conjunction with the UEC and UEC Business Website Privacy Policies, the Privacy Statement, and the Terms and Conditions of Enrolment.

Policy Details

Below are the specific details of UEC's information policy.

1. UEC is committed to ensuring its practices and decisions with respect to the gathering, management, retention, sharing, reporting, and disseminating of information is ethical and in accordance with all legislative and regulatory requirements that govern UEC and its

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operations, including the requirements set out in the ESOS Framework, the VET Quality Framework and the Privacy Act 1988.

2. UEC is committed to ensuring its practices are in compliance with any Commonwealth, State and Territory legislation and regulatory requirements relevant to the gathering, management, retention, sharing, reporting, and disseminating of information.

3. This document exists in the context of all other UEC policy and procedure documentation and must be read, understood and acted up in conjunction with those documents as and when they apply. In particular, however, this document must be read in conjunction with the UEC and UEC Business Website Privacy Policies, the Privacy Statement, and the Terms and Conditions of Enrolment, all of which add crucial context and detail for this policy and procedure.

4. UEC will make all reasonable and appropriate efforts to ensure that information disseminated about it is accurate, truthful, and appropriately comprehensive. Similarly, UEC will not provide or otherwise endorse information relating to its services, products, scope, or operations that is false or misleading.

5. UEC will ensure that all information provided to students is in plain English.

6. UEC will ensure that it will provide accurate, truthful, and appropriately comprehensive information in response to any reasonable request from the ESOS Agency (ASQA), the Department of Education, the Department of Home Affairs, The TPS, PRISMS, and any other government body or representative including but not limited to ASIC and the ATO.

7. UEC will ensure that it gathers and retains all required information when accepting a student for enrolment.

8. UEC will ensure that when it gathers information from prospective, enrolling, ongoing, and/or graduating students, it will properly inform each individual of their rights with respect to that information including rights relating to reviewing and correcting errors in the information and the circumstances under which UEC will disclose (in accordance with the Privacy Act 1988) personal information, including via PRISMS, to the TPS, and to other Commonwealth and state/territory agencies.

9. UEC will ensure that, should a student wish to access personal information pertaining to him or her, this access will not incur any cost not previously indicated to the student and not exceeding the cost incurred by UEC in providing access to that information.

10. UEC will make reasonable endeavours to ensure the accuracy and completeness of the information it gathers from students both at the time of collection and at appropriate intervals ongoing.

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11. UEC will ensure that all information stored electronically will be appropriately secured and backed up.

12. UEC will ensure that its information systems and practices support the accuracy and integrity of information gathered, retained, shared, and/or published.

13. UEC will ensure that its information systems and practices are responsive to the needs of students, staff and stakeholders and the environment and that it takes appropriate steps to review and improve the performance of these systems and practices.

14. UEC will ensure all staff have up to date awareness and understanding of legislative and regulatory obligations that pertain to them, their role, and/or UEC as is necessary and appropriate. This will include appropriate onboarding processes for new staff and staff moving into new roles as well as training for all staff impacted by any changes to compliance related obligations and/or practices that may happen from time to time.

15. UEC will make this and all other relevant policy and procedure documentation available to staff and all relevant stakeholders.

16. UEC will ensure that the management and implementation of matters relating to the gathering, management, retention, sharing, and disseminating of information will involve sufficient capability and capacity in order to ensure compliance with this policy and with all legislative and regulatory requirements, such as those set out in the ESOS framework.

17. UEC will ensure appropriate records are kept with respect to information gathered, managed, retained, shared, and/or disseminated.

Procedure Details - General

Below are the specific elements of the implementation of the above-detailed policy and the procedures to be followed by UEC staff and its contractors and partners.

18. Responsibility for approving and ensuring the effective maintenance and implementation of this policy is held by the Managing Director. Should this role be vacant for any reason, the responsibility immediately escalates to another Director of UEC.

19. As per the details of the Governance and Compliance Policy, this policy and procedure will be reviewed periodically and will be updated whenever is required by any changes in the regulatory or legislative requirements that govern UEC, within UEC itself, or other changes that might require its review.

20. As per the details of the Governance and Compliance Policy, this policy and procedure will be made available by UEC to all relevant stakeholders.

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21. All UEC staff and its contractors and partners involved in the gathering, management, retention, sharing, reporting, and disseminating of information from or to prospective and/or currently or previously enrolled students and/or information relating to UEC and/or to whom this policy otherwise applies are made aware of this policy and procedure, are supported to understand its contents, and trained to follow its directives through:
    a. Effective induction; and
    b. Ongoing training, communication, and updating regarding any changes; and
    c. Any other means deemed appropriate from time to time.

Procedure Details – Disseminating Information

Below are the specific elements of the implementation of the above-detailed policy and the procedures relating to the disseminating of information.

22. The General Manager will, as per the policies relating to marketing, student recruitment, and enrolment sign off on the Collateral Compliance Checklist for all new or amended marketing, sales, and enrolment materials that are intended for disseminating information about UEC for the purposes of marketing or otherwise recruiting and/or enrolling students.

23. The General Manager will ensure that the websites used for promoting the services of UEC will have a Website Privacy Policy that is accessible to anyone visiting the website and that effectively addresses the obligations of UEC for such a policy.

24. The General Manager will ensure that appropriate records are kept of all past collateral published or otherwise disseminated to students and/or publicly.

Procedure Details – Gathering, Managing, and Retaining Information

Below are the specific elements of the implementation of the above-detailed policy and the procedures relating to the gathering, management, and retention of information.

25. Admission staff will, via the UEC application form and enrolments processes ensure that the following information is collected on each student accepted for enrolment in a registered UEC course:
    a. the student's full name
    b. the student's gender
    c. the student's date of birth
    d. the student's country of birth
    e. the student's nationality
    f. the student's current residential address in Australia
    g. the student's mobile number in Australia (if any)
    h. the student's email address (if any)

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i. if the student is under 18 years old:
    i. the current residential address, mobile phone number (if any) and email address (if any) of a person (not UEC or an officer or staff member of UEC) who has legal authority to act on the student's behalf; and
    ii. the relationship of the person to the student
j. the unique identifier of the student's course and its location (i.e. CRICOS Provider Code and CRICOS Course Code)
k. the agreed starting day of the course
l. the day when the student is expected to complete the course
m. the amount of tuition fees received from or on behalf of the student specifically for the course before the student's enrolment was confirmed in PRISMS
n. the start and end dates of the course period to which the amount identified in point (j) relates;
o. the amount of non-tuition fees received for the student for the course before confirming the student's enrolment in PRISMS;
p. the total amount of tuition fees required for the full course as per the student's written agreement
q. if the student has undertaken an endorsed test of his or her level of English, the name of the test and the score achieved
r. if the student was in Australia when he or she became an accepted student, the number of the student's passport;
s. if the student holds an Australian visa, the number of the visa

26. The General Manager will oversee that, student services and academic staff will, at least once in every 6-month period, contact all current students to confirm and/or update or otherwise correct in writing the following personal information:
    a. the student's current residential address in Australia
    b. the student's mobile phone number (if any)
    c. the student's email address (if any)
    d. if the student is under the age of 18 years:
        i. the name of the student's parent or guardian in Australia
        ii. the current residential address in Australia of the parent or guardian
        iii. the mobile phone number (if any) of the parent or guardian
        iv. email address (if any) of the parent or guardian

27. Admissions and/or accounts staff will ensure that all relevant documentation relating to the application or enrolment of a prospective, current, or former student will be filed and retained in the UEC computer system. This will include, but is not necessarily limited to:
    a. each student application received
    b. each written agreement issued
    c. each written agreement received
    d. each invoice issued where the invoice includes:
        i. the nature of the fees – tuition or non-tuition; course/service ID
        ii. the start and end dates for the enrolment periods to which the fees relate
    e. each payment receipt issued, including:
        i. the nature of the payments – tuition or non-tuition; course/service ID

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ii. the start and end dates for the enrolment periods to which the payments relate

f. copies of personal identification documents received (inc. passport, visa)
g. any warning letters relating to the student meeting (or actually or potentially failing to meet) visa obligations
h. any notices of intention to report the student for failing to meet visa obligations

28. The Registrar will ensure that a 'Privacy Notice' is issued along with every Letter of Offer sent to a prospective UEC Business student.

29. Academic management and student services staff will ensure that appropriately detailed, up to date, and accurate records are kept of information on and written and/or verbal communications with students relating to:
    a. attendance of lessons
    b. academic performance and/or progress, including the student's assessment outcomes for units, modules, and courses
    c. academic conduct
    d. complaints and/or appeals
    e. payment of fees
    f. warnings relating to meeting visa obligations, including those relating to the matters mentioned above
    g. notices of intention to report the student for failing to meet visa obligations, including those relating to the matters mentioned above
    h. instances of the student failing to attend meetings or respond to communications relating to any of the above.

30. Students' rights with respect to personal information gathered and/or retained by or on behalf of UEC are made clear in the UEC Terms and Conditions that are part of the UEC Application Form and the Written Agreement. Any changes to either of those documents must ensure that these rights remain appropriately detailed in plain English. This must include:
    a. that the information will be treated in accordance with the Privacy Act 1988
    b. that each student can request access to view any personal information pertaining to him or her that is held by or on behalf of UEC
    c. the details and amount of any fee to be charged for access to any personal information pertaining to him or her – where this is either free of charge or for a fee that does not exceed the cost to UEC for accessing the data
    d. that each student can request corrections to any errors in any personal information pertaining to him or her that is held by or on behalf of UEC
    e. that UEC will disclose part or all of this personal information as it is obliged to under the ESOS Framework, including by disclosing it as and when required in PRISMS, to the TPS, and/or to any other Commonwealth and state/territory agencies.

31. The Managing Director will oversee the planning and implementation of appropriately secure data back-up processes for all electronic records. This will include periodic offsite back up.

32. The Managing Director will oversee the retention of all student information over time ensuring that no data pertaining to a past student is deleted except:
    a. where it is deleted to replace it with up to date or otherwise corrected data, or

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b. it has first been transferred to an alternative storage place, or
c. where the student has ceased to be a student of UEC more than 24 months prior to the information being deleted, and
d. the data does not pertain to a student's assessment or course outcomes for a course or unit of study.

33. The Managing Director is responsible for overseeing the establishment, updating, improvement, and maintenance of the UEC information systems and resources, including the student management system and the data storage facilities. The General Manager will encourage ongoing reporting of issues, complaints, and opportunities for improvement related to UEC's information systems, policies, and practices from all staff, students, and other stakeholders.

Procedure Details – Sharing and/or Reporting Information

Below are the specific elements of the implementation of the above-detailed policy and the procedures relating to the sharing and reporting of information.

34. Admissions staff will update PRISMS with the required information within 31 days for a student who is 18 years of age or older or within 14 days for a student under the age of 18 if:
    a. the student is accepted for enrolment
    b. the student does not begin his or her course when expected, unless a deferral has been granted or health or compassionate grounds
    c. there is a deferral of the student's enrolment
    d. there is a suspension of the student's enrolment
    e. the student's enrolment ends before the expected finishing date
    f. the student's course delivery location changes
    g. the student changes any of his or her address, phone, or email details

35. The Registrar will update PRISMS with all the required details as soon as practical whenever a student breaches the terms of his or her visa and all appeal processes have been appropriately completed as per the policies relating to appeals and to cancelling student enrolments. This includes cases where the student has already ceased to be a student of UEC for any reason.

36. The Managing Director will oversee the provision of any information to regulatory authorities in registration-related submissions or relating to required periodic or ad hoc reporting on UEC operations and ensure that the submission is in accordance with all other elements of this document and that, insofar as it is practical, reasonable evidence demonstrating the information is accurate, truthful, up to date, and appropriately comprehensive is sighted. This includes, but is not necessarily limited to information submitted to:
    a. the ESOS Agency (ASQA),
    b. the Department of Education,
    c. the Department of Home Affairs,
    d. the TPS,
    e. PRISMS.

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In Compliance With

The various elements of this document have been developed to comply with the requirements under the ESOS framework, including, but not necessarily limited to:

ESOS Act: Sections 19 and 21

The ESOS Regulations: Section 3

The National Code: Standards 3, 5, 10

Standards for RTOs 2015: Standards 4 & 8

Version Control

Last Updated:	20/08/2025
Updated By:	Richard Pincus
Approved By:	Dan Wortley
Changes Made:	Remove mention of AISI and UEC Business

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