

<b>Institution</b>	Universal Higher Education (UHE)
<b>Policy name</b>	Privacy Policy
<b>Policy Governance</b>	Board of Directors

## 1. Introduction

This outlines Universal Higher Education's (UHE's) policy on how UHE uses and manages personal information provided to or collected by it. UHE is bound by the Australian Privacy Principles contained in the Privacy Act 1988 (the Privacy Act).

This policy ensures that UHE meets its legal and ethical requirements in regard to the collection, storage and disclosure of the personal information it holds in regard to individuals. This policy and procedure contributes to compliance of the Australian Privacy Principles contained in the Privacy Act 1988.

UHE is committed to maintaining the privacy and confidentiality of its personnel and participant records. UHE may, from time to time, review and update this Privacy Policy and Procedure to take account of new laws and technology, changes to UHE operations and practices and to make sure it remains appropriate to the changing environment.

## 2. Objectives

The objective of this Policy and Procedure for Universal Higher Education (UHE) is to;

- Ensures that information collected from students and staff is managed and kept confidentially,
- Information is used for its intended purpose and not provided to third parties except with the provider's authorisation or as required by law or the regulator and
- All work practices at UHE comply with the Australian Privacy Principles (APPs) and Privacy Act 1988.

For the purposes of this policy, the term “UHE” refers to Universal Higher Education.

## 3. Scope

This policy applies to all staff of UHE and all current, past, and prospective students.

#### 4. Terms and definitions

**Personal Information** refers to any information provided in writing or verbally that is provided with the expectation that by giving that information it will be handled confidentially.

UHE complies with the Australian Privacy Principles set out in the Privacy Act 1988 in relation to the collection of information relating to all students.

UHE will allow a student to apply for and receive a copy of the UHE personal information that the provider holds in relation to that student.

**Privacy Act 1988** is an Australian law dealing with privacy. Section 14 of the Act stipulates a number of privacy rights known as the Australian Privacy Principles (APPs).

#### 5. Policy principles

UHE is committed to maintaining compliance with all regulatory, legislative, and contractual requirements.

Specifically, UHE will:

- Establish the privacy and personal Information procedure to comply with the requirements of clause 14 of Schedule 1 in the Privacy Act 1988, that outlines the 13 Australian Privacy Principles (APPs).
- Provide clear information regarding the following requirements:
  - **Australian Privacy Principle 1** – Open and transparent management of personal information
    - Types of personal information collected and held
    - How personal information is collected.
    - How personal information is held.
    - Retention and Destruction of Information
    - Accessing and seeking correction of personal information
    - Making our APP Privacy Policy available on UHE’s website via <https://www.uhe.edu.au/policies-procedures-forms>
    - Review and Update of this APP Privacy Policy
  - **Australian Privacy Principle 2** – Anonymity and pseudonymity
    - Requiring identification
  - **Australian Privacy Principle 3** — Collection of solicited personal information.
  - **Australian Privacy Principle 4** – Dealing with unsolicited personal information.
  - **Australian Privacy Principle 5** – Notification of the collection of personal information

**Australian Privacy Principle 6** – Use or disclosure of personal information.

**Australian Privacy Principle 7** – Direct marketing

**Australian Privacy Principle 8** – Cross-border disclosure of personal information

**Australian Privacy Principle 9** – Adoption, use or disclosure of government related identifiers.

**Australian Privacy Principle 10** – Quality of personal information

**Australian Privacy Principle 11** – Security of personal information

**Australian Privacy Principle 12** – Access to personal information

**Australian Privacy Principle 13** – Correction of personal information

- Correcting at UHE’s initiative
- ‘Request for Records Access’ Procedure
- Confirming identity
- ‘Request for Records Update’ Procedure
- Assessing Update
- Privacy Complaints Procedure

## 6. General Processes

As a component of our risk management practices, UHE has followed Privacy Impact Assessment for all operations and processes for the management of privacy risks at each stage of the information lifecycle, including collection, use, disclosure, storage, destruction and de-identification.

Policy aspect	UHE Implementation
Australian Privacy Principle 1 – Open and transparent management of personal information	<p>Purposes for information collection, retention, use and disclosure</p> <p>UHE retains a record of personal information about all individuals with whom UHE undertake any form of business activity. UHE must collect, hold, use and disclose information from our clients and stakeholders for a range of purposes, including but not limited to:</p> <ul style="list-style-type: none"> <li>● Providing services to clients;</li> <li>● Managing employee and contractor teams;</li> <li>● Promoting products and services;</li> <li>● Conducting internal business functions and activities; and</li> <li>● Requirements of stakeholders.</li> </ul> <p>As a Higher Education Provider organisation, regulated by the TEQSA, UHE is required to collect, hold, use and disclose a wide range of personal and sensitive information on participants.</p> <p>It is noted that UHE is also bound by various State Government Acts requiring similar information collection, use and disclosure.</p> <p>It is further noted that, aligned with these legislative requirements, UHE may deliver courses through a range of Commonwealth and State Government funding contract agreement arrangements, which also may include various information collection and disclosure requirements. Individuals are advised that due to these legal requirements, UHE discloses information held on individuals for valid purposes to a range of entities including:</p>

	<ul style="list-style-type: none"> <li>• Governments (Commonwealth, State or Local);</li> <li>• Employers (and their representatives), Job Network Providers, and</li> <li>• Service providers such as credit agencies and background check providers.</li> </ul>
Types of personal information collected and held	<p>The following types of personal information are generally collected, depending on the need for service delivery:</p> <ul style="list-style-type: none"> <li>• Contact details;</li> <li>• Employment details;</li> <li>• Educational background;</li> <li>• Demographic Information;</li> <li>• Course progress and achievement information;</li> <li>• Tax file number in accordance with the TFN guidelines;</li> <li>• USI in accordance with USI guidelines; and</li> <li>• Financial billing information.</li> </ul> <p>The following types of sensitive information may also be collected and held:</p> <ul style="list-style-type: none"> <li>• Identity details and documentation;</li> <li>• Employee details &amp; HR information;</li> <li>• Complaint or issue information;</li> <li>• Disability status &amp; other individual needs;</li> <li>• Indigenous status; and</li> <li>• Background checks (such as National Criminal Checks).</li> </ul>
How personal information is collected	<p>UHE's usual approach to collecting personal information is to collect any required information directly from the individuals concerned. This may include the use of forms (such as registration forms, enrolment forms or service delivery records) and the use of web-based systems (such as online enquiry forms, web portals or internal operating systems).</p> <p>UHE does receive solicited and unsolicited information from third party sources in undertaking service delivery activities. This may include information from such entities as:</p> <ul style="list-style-type: none"> <li>• Governments (Commonwealth, State or Local);</li> <li>• Employers (and their representatives), Job Network Providers; and</li> <li>• Service providers such as credit agencies and background check providers.</li> </ul>
How personal information is held	<p>UHE's usual approach to holding personal information includes robust storage and security measures at all times. Information on collection is:</p> <ul style="list-style-type: none"> <li>• As soon as practical converted to electronic means;</li> <li>• Stored in secure, password protected systems, such as financial system, learning management system and student management system; and</li> <li>• Monitored for appropriate authorized use at all times.</li> </ul> <p>Only authorized personnel are provided with login information to each system, with system access limited to only those relevant to their specific role. UHE ICT systems are hosted internally with robust internal security to physical server locations and server systems access. Virus protection, backup procedures and ongoing access monitoring procedures are in place.</p> <p>Destruction of paper-based records occurs as soon as practicable in every matter, through the use of secure shredding and destruction services at all UHE sites.</p> <p>Individual information held across systems is linked through an UHE allocated identification number for each individual.</p>
Retention and Destruction of Information	<p>UHE maintains a Retention and Disposal Schedule documenting the periods for which personal information records are kept.</p> <p>Specifically, for our UHE records, in the event of our organisation ceasing to operate the required personal information on record for individuals undertaking courses would be transferred to the regulatory authority, as required by law.</p>

<p>Accessing and seeking correction of personal information</p>	<p>UHE confirms all individuals have a right to request access to their personal information held and to request its correction at any time. In order to request access to personal records, individuals are to contact: UHE's Academic Registrar or submit a request using the Records Access or Update Request Form on UHE website: <a href="https://www.uhe.edu.au/policies-procedures-forms">https://www.uhe.edu.au/policies-procedures-forms</a>.</p> <p>A number of third parties, other than the individual, may request access to an individual's personal information. Such third parties may include employers, parents or guardians, Governments (Commonwealth, State or Local) and various other stakeholders.</p> <p>In all cases where access is requested, UHE will ensure that:</p> <ul style="list-style-type: none"> <li>• Parties requesting access to personal information are robustly identified and vetted;</li> <li>• Where legally possible, the individual to whom the information relates will be contacted to confirm consent (if consent not previously provided for the matter); and</li> <li>• Only appropriately authorised parties, for valid purposes, will be provided access to the information.</li> </ul> <p>Complaints about a breach of the APPs or a binding registered APP code If an individual feels that UHE may have breached one of the APPs or a binding registered APP he/she may refer to Privacy Complaints Procedure below for further information.</p>
<p>Making our APP Privacy Policy available</p>	<p>UHE provides our APP Privacy Policy available free of charge, with all information being publicly available from the Privacy link on our website at <a href="http://www.uhe.edu.au">www.uhe.edu.au</a>. This website information is designed to be accessible as per web publishing accessibility guidelines, to ensure access is available to individuals with special needs.</p> <p>In addition, this APP Privacy Policy is:</p> <ul style="list-style-type: none"> <li>• Prominently displayed at each UHE's site;</li> <li>• Included within our Student Handbook;</li> <li>• Noted within the text or instructions at all information collection points (such as informing individuals during a telephone call of how the policy may be accessed, in cases where information collection is occurring); and</li> <li>• Available for distribution free of charge on request, as soon as possible after the request is received, including in any particular format requested by the individual as is reasonably practical.</li> </ul> <p>If, in the unlikely event the APP Privacy Policy is not able to be provided in a particular format requested by an individual, UHE will explain the circumstances around this issue with the requester and seek to ensure that another appropriate method is provided.</p>
<p>Review and Update of this APP Privacy Policy</p>	<p>UHE reviews this Privacy Policy:</p> <ul style="list-style-type: none"> <li>• On an ongoing basis, as suggestions or issues are raised and addressed, or as government required changes are identified;</li> <li>• Through our internal audit processes on at least on an annual basis;</li> <li>• As a part of any external audit of our operations that may be conducted by various government agencies as a part of our registration as an UHE or in normal business activities; and</li> <li>• As a component of each and every complaint investigation process where the complaint is related to a privacy matter.</li> </ul> <p>Where this policy is updated, changes to the policy are widely communicated to stakeholders through internal personnel communications, meetings, training and documentation, and externally through publishing of the policy on UHE's website and other relevant documentation (such as our Student Handbook) for clients.</p>
<p>Australian Privacy Principle 2 –</p>	<p>UHE provides individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us in relation to a particular matter, whenever practical. This includes providing options for anonymous dealings in cases of general course enquiries or other situations in which an</p>

Anonymity and pseudonymity	<p>individuals' information is not required to complete a request.</p> <p>Individuals may deal with us by using a name, term or descriptor that is different to the individual's actual name wherever possible. This includes using generic email addresses that does not contain an individual's actual name, or generic usernames when individuals may access a public component of our website or enquiry forms.</p> <p>UHE only stores and links pseudonyms to individual personal information in cases where this is required for service delivery (such as system login information) or once the individual's consent has been received.</p> <p>Individuals are advised of their opportunity to deal anonymously or by pseudonym with us where these options are possible.</p>
Requiring identification	<p>UHE must require and confirm identification however in service delivery to individuals for enrolment in courses. UHE are authorised by Australian law to deal only with individuals who have appropriately identified themselves. That is, it is a Condition of Registration for all UHEs under the TEQSA that UHE identify individuals and their entry eligibility on commencement of course delivery and collect and disclose HEIMS data on all individuals enrolled in courses. Other legal requirements, as noted earlier in this policy, also require considerable identification arrangements.</p> <p>There are also other occasions also within our service delivery where an individual may not have the option of dealing anonymously or by pseudonym, as identification is practically required for us to effectively support an individual's request or need.</p>
Australian Privacy Principle 3 — Collection of solicited personal information	<p>UHE only collects personal information that is reasonably necessary for our business activities. UHE only collect sensitive information in cases where the individual consents to the sensitive information being collected, except in cases where UHE are required to collect this information by law, such as outlined earlier in this policy.</p> <p>All information UHE collect is collected only by lawful and fair means. UHE only collect solicited information directly from the individual concerned, unless it is unreasonable or impracticable for the personal information to only be collected in this manner.</p>
Australian Privacy Principle 4 – Dealing with unsolicited personal information	<p>UHE may from time to time receive unsolicited personal information. Where this occurs UHE promptly review the information to decide whether or not UHE could have collected the information for the purpose of our business activities. Where this is the case, UHE may hold, use and disclose the information appropriately as per the practices outlined in this policy.</p> <p>Where UHE could not have collected this information (by law or for a valid business purpose) UHE immediately destroy or de-identify the information (unless it would be unlawful to do so).</p>
Australian Privacy Principle 5 – Notification of the collection of personal information	<p>Whenever UHE collects personal information about an individual, UHE take reasonable steps to notify the individual of the details of the information collection or otherwise ensure the individual is aware of those matters. This notification occurs at or before the time of collection, or as soon as practicable afterwards.</p> <p>Our notifications to individuals on data collection include:</p> <ul style="list-style-type: none"> <li>• UHE's identity and contact details, including the position title, telephone number and email address of a contact who handles enquiries and requests relating to privacy matters;</li> <li>• The facts and circumstances of collection such as the date, time, place and method of collection, and whether the information was collected from a third party, including the name of that party;</li> <li>• If the collection is required or authorised by law, including the name of the Australian law or other legal agreement requiring the collection;</li> <li>• The purpose of collection, including any primary and secondary purposes;</li> <li>• The consequences for the individual if all or some personal information is not collected;</li> <li>• Other organisations or persons to which the information is usually disclosed, including naming</li> </ul>



	<p>those parties;</p> <ul style="list-style-type: none"> <li>• Whether UHE are likely to disclose the personal information to overseas recipients, and if so, the names of the recipients and the countries in which such recipients are located.</li> <li>• A link to this APP Privacy Policy on our website or explain how it may be accessed; and</li> <li>• Advice that this APP Privacy Policy contains information about how the individual may access and seek correction of the personal information held by us; and how to complain about a breach of the APPs, or any registered APP code, and how UHE will deal with such a complaint.</li> </ul> <p>Where possible, UHE ensure that the individual confirms their understanding of these details, such as through signed declarations, website form acceptance of details or in person through questioning.</p> <p>Collection from third parties Where UHE collects personal information from another organisation, UHE:</p> <ol style="list-style-type: none"> <li>1. Confirm whether the other organisation has provided the relevant notice above to the individual; or</li> <li>2. Whether the individual was otherwise aware of these details at the time of collection; and</li> <li>3. If this has not occurred, UHE will undertake this notice to ensure the individual is fully informed of the information collection.</li> </ol>
<p>Australian Privacy Principle 6 – Use or disclosure of personal information</p>	<p>UHE only uses or discloses personal information it holds about an individual for the particular primary purposes for which the information was collected, or secondary purposes in cases where:</p> <ul style="list-style-type: none"> <li>• An individual consented to a secondary use or disclosure;</li> <li>• An individual would reasonably expect the secondary use or disclosure, and that is directly related to the primary purpose of collection; or</li> <li>• Using or disclosing the information is required or authorised by law.</li> </ul> <p>Requirement to make a written note of use or disclosure for this secondary purpose If UHE uses or discloses personal information in accordance with an ‘enforcement related activity’ UHE will make a written note of the use or disclosure, including the following details:</p> <ul style="list-style-type: none"> <li>• The date of the use or disclosure;</li> <li>• Details of the personal information that was used or disclosed;</li> <li>• The enforcement body conducting the enforcement related activity;</li> <li>• If the organisation used the information, how the information was used by the organisation;</li> <li>• The basis for our reasonable belief that UHE were required to disclose the information.</li> </ul>
<p>Australian Privacy Principle 7 – Direct marketing</p>	<p>UHE does not use or disclose the personal information that it holds about an individual for the purpose of direct marketing, unless:</p> <ul style="list-style-type: none"> <li>• The personal information has been collected directly from an individual, and the individual would reasonably expect their personal information to be used for the purpose of direct marketing; or</li> <li>• The personal information has been collected from a third party, or from the individual directly, but the individual does not have a reasonable expectation that their personal information will be used for the purpose of direct marketing; and</li> <li>• UHE provide a simple method for the individual to request not to receive direct marketing communications (also known as ‘opting out’).</li> <li>• On each of our direct marketing communications, UHE provides a prominent statement that the individual may request to opt out of future communications, and how to do so. An individual may also request us at any stage not to use or disclose their personal information for the purpose of direct marketing, or to facilitate direct marketing by other organisations. UHE comply with any request by an individual promptly and undertake any required actions for free.</li> </ul> <p>UHE also, on request, notify an individual of our source of their personal information used or disclosed for the purpose of direct marketing unless it is unreasonable or impracticable to do so.</p>

<p>Australian Privacy Principle 8 – Cross-border disclosure of personal information</p>	<p>Before UHE discloses personal information about an individual to any overseas recipient, UHE undertake take reasonable steps to ensure that the recipient does not breach any privacy matters in relation to that information.</p>
<p>Australian Privacy Principle 9 – Adoption, use or disclosure of government related identifiers</p>	<p>UHE does not adopt, use or disclose a government related identifier related to an individual except:</p> <ul style="list-style-type: none"> <li>• In situations required by Australian law or other legal requirements;</li> <li>• Where reasonably necessary to verify the identity of the individual;</li> <li>• Where reasonably necessary to fulfil obligations to an agency or a State or Territory authority; or</li> <li>• As prescribed by regulations.</li> </ul>
<p>Australian Privacy Principle 10 – Quality of personal information</p>	<p>UHE takes reasonable steps to ensure that the personal information it collects is accurate, up-to-date and complete. UHE also take reasonable steps to ensure that the personal information UHE use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant. This is particularly important where:</p> <ul style="list-style-type: none"> <li>• When UHE initially collect the personal information; and</li> <li>• When UHE use or disclose personal information.</li> </ul> <p>UHE take steps to ensure personal information is factually correct. In cases of an opinion, UHE ensure information takes into account competing facts and views and makes an informed assessment, providing it is clear this is an opinion. Information is confirmed up-to-date at the point in time to which the personal information relates.</p> <p>Quality measures in place supporting these requirements include:</p> <ul style="list-style-type: none"> <li>• Internal practices, procedures and systems to audit, monitor, identify and correct poor quality personal information (including training staff in these practices, procedures and systems);</li> <li>• Protocols that ensure personal information is collected and recorded in a consistent format, from a primary information source when possible;</li> <li>• Ensuring updated or new personal information is promptly added to relevant existing records;</li> <li>• Providing individuals with a simple means to review and update their information on an on-going basis through our online portal;</li> <li>• Reminding individuals to update their personal information at critical service delivery points (such as completion) when UHE engage with the individual;</li> <li>• Contacting individuals to verify the quality of personal information where appropriate when it is about to used or disclosed, particularly if there has been a lengthy period since collection; and</li> <li>• Checking that a third party, from whom personal information is collected, has implemented appropriate data quality practices, procedures and systems.</li> </ul>
<p>Australian Privacy Principle 11 – Security of personal information</p>	<p>UHE takes active measures to consider whether UHE are able to retain personal information UHE hold, and also to ensure the security of personal information UHE hold. This includes reasonable steps to protect the information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.</p> <p>UHE destroy or de-identify personal information held once the information is no longer needed for any purpose for which the information may be legally used or disclosed.</p> <p>Access to UHE offices and work areas is limited to our personnel only - visitors to our premises must be authorised by relevant personnel and are accompanied at all times. With regard to any</p>



	<p>information in a paper-based form, UHE maintain storage of records in an appropriately secure place to which only authorised individuals have access.</p> <p>Regular staff training and information bulletins are conducted with UHE personnel on privacy issues, and how the APPs apply to our practices, procedures and systems. Training is also included in our personnel induction practices.</p> <p>UHE conduct ongoing internal audits (at least annually and as needed) of the adequacy and currency of security and access practices, procedures and systems implemented.</p> <p>Storage and security of personal information</p> <p>UHE will ensure:</p> <ul style="list-style-type: none"> <li>• That the record is protected, by such security safeguards as it is reasonable in the circumstances to take, against loss, against unauthorised access, use, modification or disclosure, and against other misuse.</li> <li>• That if it is necessary for the record to be given to a person in connection with the provision of a service to the HE Provider, everything reasonably within the power of the HE Provider will be done to prevent unauthorised use or disclosure of information contained in the record.</li> <li>• UHE sets out in its Records Management policy the retention period of personal information and then its subsequent secure destruction (secure shredding).</li> <li>• For data stored on electronic systems, access is controlled by secure sign on procedures for authorised administrative staff.</li> <li>• UHE will not use the information without taking reasonable steps to ensure that, having regard to the purpose for which the information is proposed to be used, the information is accurate, up to date and complete. UHE will not use the information except for a purpose to which the information is relevant.</li> <li>• Photographs</li> <li>• At times during attendance at UHE staff and students may be included in photographs taken either for identification or recording events.</li> <li>• At times, UHE may request to use one or more of these photographs for publicity or marketing purposes.</li> <li>• UHE will only use such material on the express written consent of the individual. This consent may be revoked at any time (but material already in the public domain may remain so).</li> </ul>
<p>Australian Privacy Principle 12 – Access to personal information</p>	<p>Where UHE holds personal information about an individual, UHE provide that individual access to the information on their request. In processing requests, UHE:</p> <ul style="list-style-type: none"> <li>• Ensure through confirmation of identity that the request is made by the individual concerned, or by another person who is authorised to make a request on their behalf;</li> <li>• Respond to a request for access: <ul style="list-style-type: none"> <li>○ Within 14 calendar days, when notifying our refusal to give access, including providing reasons for refusal in writing, and the complaint mechanisms available to the individual; or</li> <li>○ Within 30 calendar days, by giving access to the personal information that is requested in the manner in which it was requested.</li> </ul> </li> <li>• Provide information access free of charge.</li> </ul>
<p>Australian Privacy Principle 13 – Correction of personal information</p>	<p>UHE takes reasonable steps to correct personal information UHE hold, to ensure it is accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held.</p> <p>Individual Requests</p> <p>On an individual’s request, UHE:</p> <ul style="list-style-type: none"> <li>• Correct personal information held; and</li> <li>• Notify any third parties of corrections made to personal information, if this information was previously provided to these parties.</li> </ul>

	<ul style="list-style-type: none"> <li>• In cases where UHE refuse to update personal information, UHE:</li> <li>• Give a written notice to the individual, including the reasons for the refusal and the complaint mechanisms available to the individual;</li> <li>• Upon request by the individual whose correction request has been refused, take reasonable steps to associate a statement with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading;</li> <li>• Respond within 14 calendar days to these requests; and</li> <li>• Complete all actions free of charge.</li> </ul>
Correcting at UHE's initiative	<p>UHE take reasonable steps to correct personal information UHE hold in cases where UHE are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading (that is, the information is faulty). This awareness may occur through collection of updated information, in notification from third parties or through other means.</p>
'Request for Records Access' Procedure	<p>Individuals or third parties may at any stage request access to records held by UHE relating to their personal information. The following procedure is followed on each individual request for access:</p> <ol style="list-style-type: none"> <li>1. A request for access is provided by the requester, with suitable information provided to be able to: <ol style="list-style-type: none"> <li>a. Identify the individual concerned;</li> <li>b. Confirm their identity; and</li> <li>c. Identify the specific information that they are requesting access to.</li> </ol> </li> </ol> <p>This request may be in any form, or preferably using UHE's Records Access or Update Request Form on UHE website: <a href="https://www.uhe.edu.au/policies-procedures-forms">https://www.uhe.edu.au/policies-procedures-forms</a>.</p> <ol style="list-style-type: none"> <li>2. Upon receiving a request for access, UHE then: <ol style="list-style-type: none"> <li>a. Confirms the identity of the individual or party requesting access;</li> <li>b. Confirms that this individual or party is appropriately authorised to receive the information requested;</li> <li>c. Searches the records that UHE possess or control to assess whether the requested personal information is contained in those records; and</li> <li>d. Collates any personal information found ready for access to be provided.</li> </ol> </li> </ol>
Confirming identity	<p>UHE personnel must be satisfied that a request for personal information is made by the individual concerned, or by another person who is authorised to make a request on their behalf. The minimum amount of personal information needed to establish an individual's identity is sought, which is generally an individual's name, date of birth, last known address and signature.</p> <p>When meeting the requesting party in person, identification may be sighted.</p> <p>If confirming details over a telephone conversation, questions regarding the individual's name, date of birth, last known address or service details may be confirmed before information is provided.</p> <ol style="list-style-type: none"> <li>3. Once identity and access authorisation is confirmed, and personal information is collated, access is provided to the requester within 30 calendar days of receipt of the original request.</li> </ol> <p>UHE will provide access to personal information in the specific manner or format requested by the individual, wherever it is reasonable and practicable to do so, free of charge.</p> <p>Where the requested format is not practical, UHE consult with the requester to ensure a format is provided that meets the requester's needs.</p> <ol style="list-style-type: none"> <li>4. If the identity or authorisation access cannot be confirmed, or there is another valid reason why UHE is unable to provide the personal information, refusal to provide access to records will be</li> </ol>

	<p>provided to the requester, in writing. Our notification will include reason(s) for the refusal, and the complaint mechanisms available to the individual. Such notifications are provided to the requester within 30 calendar days of receipt of the original request.</p>
<p>'Request for Records Update' Procedure</p>	<p>Individuals or third parties may at any stage request that their records held by UHE relating to their personal information be updated. The following procedure is followed on each individual request for records updates:</p> <ol style="list-style-type: none"> <li>1. A request for records update is provided by the requester, with suitable information provided to be able to:           <ol style="list-style-type: none"> <li>a. Identify the individual concerned;</li> <li>b. Confirm their identity; and</li> <li>c. Identify the specific information that they are requesting be updated on their records.</li> </ol> </li> </ol> <p>This request may be in any form, or preferably using UHE's Records Access or Update Request Form on UHE website: <a href="https://www.uhe.edu.au/policies-procedures-forms">https://www.uhe.edu.au/policies-procedures-forms</a>.</p> <ol style="list-style-type: none"> <li>2. Upon receiving a request for records update, UHE then:           <ol style="list-style-type: none"> <li>a. Confirms the identity of the individual or party to whom the record relates;</li> <li>b. Searches the records that UHE possess or control to assess whether the requested personal information is contained in those records; and</li> <li>c. Assesses the information already on record, and the requested update, to determine whether the requested update should proceed.</li> </ol> </li> </ol>
<p>Assessing Update</p>	<p>UHE personnel assess the relevant personal information UHE hold, and the requested updated information, to determine which version of the information is considered accurate, up-to-date, complete, relevant and not misleading, having regard to the purpose for which it is held. This may include checking information against other records held by us, or within government databases, in order to complete an assessment of the correct version of the information to be used.</p> <ol style="list-style-type: none"> <li>3. Once identity and information assessment is confirmed, personal information is:           <ol style="list-style-type: none"> <li>a. Updated, free of charge, within 14 calendar days of receipt of the original request; and</li> <li>b. Notified to any third parties of corrections made to personal information, if this information was previously provided to these parties.</li> </ol> </li> <li>4. If the identity of the individual cannot be confirmed, or there is another valid reason why UHE is unable to update the personal information, refusal to update records will be provided to the requester in writing, free of charge, within 14 calendar days.</li> </ol> <p>Our notification will include the reasons for the refusal and the complaint mechanisms available to the individual.</p> <ol style="list-style-type: none"> <li>5. Upon request by the individual whose correction request has been refused, UHE will also take reasonable steps to associate a 'statement' with the personal information that the individual believes it to be inaccurate, out-of-date, incomplete, irrelevant or misleading. This statement will be applied, free of charge, to all personal information relevant across UHE systems within 30 calendar days of receipt of the statement request.</li> </ol>
<p>Privacy Complaints Procedure</p>	<p>If an individual feel that UHE has breached its obligations in the handling, use or disclosure of their personal information, they may raise a complaint. UHE encourage individuals to discuss the situation with their UHE representative in the first instance, before making a complaint.</p> <p>The complaints handling process is as follows:</p> <ol style="list-style-type: none"> <li>1. The individual should make the complaint including as much detail about the issue as possible, in writing to UHE:</li> </ol>

	<p>Academic Registrar /PEO</p> <ol style="list-style-type: none"> <li>2. UHE will commence assessment of the complaint or appeal within 10 working days of it being made.</li> <li>3. UHE will investigate the circumstances included in the complaint and respond to the individual as soon as possible (and within 30 calendar days) regarding its findings and actions following this investigation.</li> <li>4. Should after considering this response, if the individual is still not satisfied they make escalate their complaint directly to the Information Commissioner for investigation: Office of the Australian Information Commissioner <a href="https://www.oaic.gov.au/contact-us">https://www.oaic.gov.au/contact-us</a>Phone: 1300 363 992 Monday to Thursday 10 am to 4 pm (AEST/AEDT) Email: <a href="mailto:foi@oaic.gov.au">foi@oaic.gov.au</a></li> </ol> <p>When investigating a complaint, the OAIC will initially attempt to conciliate the complaint, before considering the exercise of other complaint resolution powers.</p> <ol style="list-style-type: none"> <li>5. Alternatively, if the complaint relates to a non-privacy matter, or should individuals choose to do so, a complaint may also be lodged with the TEQSA complaints handling service for complaints against UHEs:</li> </ol> <p>Or</p> <p>Dissatisfied students with UHE' complaints process can also contact the relevant State/Territory Authority or the Australian Government Department of Education, Science.</p>
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## 7. Review

The Privacy Policy will be reviewed every three years, or more frequently as appropriate.