

PRIVACY POLICY

1. PURPOSE

- 1.1. This Policy is designed to support the College's compliance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) set out in the Privacy Act that form the basis of laws introduced to strengthen privacy protection for the general public.

2. BACKGROUND

- 2.1. At University College we recognise that your privacy is very important to you; it is to University College as well. During the course of conducting our activities, we collect personal information provided by and about people that is necessary for us to provide our services.
- 2.2. We believe that this Privacy Policy will address any potential concerns you may have about how personal information you provide to University College is collected, held, used, corrected, disclosed and transferred. You can obtain more information, upon request, about the way we manage the personal information that we hold. If you seek any further information please contact us in one of the ways set out below.
- 2.3. Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

WHAT IS PERSONAL INFORMATION?

When used in this policy, "personal information" has the meaning set out in the Privacy Act, and (in summary) means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or otherwise. A reference to 'personal information' in this Privacy Policy also includes 'health information' and 'sensitive information'.

Health information is a subset of personal information that is generally afforded a higher level of privacy protection. Health information relates to the health or disability of an individual, the provision of health services to the individual or the individual's expressed wishes about the provision of health services.

Sensitive Information is another subset of personal information that is generally afforded a higher level of privacy protection. It includes information about racial or ethnic origin,



political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record and some types of biometric information.

The types of personal information we collect about you depends on the circumstances in which the information is collected. Typically, the types of personal information we may collect can include (but is not limited to):

- a) name;
- b) age and/or date of birth;
- c) contact details such as email address and telephone numbers;
- d) current and previous home and/or postal address;
- e) gender;
- f) identification and identification checks such as driver's licence, student number, passport and visa details, working with children check, police check;
- g) bank account and debit/credit details;
- h) employment details, status and history;
- i) academic transcripts, university offers/deferrals, reports and educational qualifications;
- j) health information such as existing medical conditions, disabilities and allergy information and details of injuries or incidents that may occur on our premises;
- k) photographs, audiovisual footage and images of you, for example when attending functions at the Collect or through the use of Closed-Circuit Television (CCTV) systems that we may have installed at our premises (which we utilise for the purposes of managing security of the premises and health and safety of occupants and the public generally);
- l) preferred pronouns;
- m) indigenous status;
- n) dietary requirements;
- o) secondary schooling information;
- p) VTAC number;
- q) ATAR score (or equivalent);
- r) names, email address, mobile number and occupation of next of kin or nominated contact persons (such as parents, guardians, carers, siblings, as applicable) as per intercollegiate application form; and
- s) vaccination status.

If you access our websites, we may utilise cookies to collect additional information about your use of our website (see "Cookies" section below).

3. SCOPE

- 3.1 This Policy applies to all **Residents, Workers and Visitors** of the College.
- 3.2 We are bound by, and committed to complying with the Privacy Act and the APPs set out in the Privacy Act.
- 3.3 The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal.
- 3.4 We are also required to comply with more specific privacy legislation in some circumstances, such as the *Health Records Act 2001* (Vic) when we collect and handle health information.

4. RESPONSIBILITIES

4.1 COLLECTION AND DATA QUALITY

In the course of our activities we collect and hold personal information about present students, their parents/guardians, alumni, staff and other individuals. We will only collect personal information from you by lawful and fair means, without being unreasonably intrusive. Where reasonable and practicable we will only collect personal information about an individual from that individual. We may collect your personal information through some of the following means:

- when you submit an application for residency with us;
- when you make a general inquiry or inquiry regarding our services, including through our website or social media pages;
- when you contact us via telephone, email or other means; and
- when you attend our premises or an event that we are hosting.

In some circumstances, we may collect personal information about an individual from a third party, for example, by a present student about a parent. In such cases, the person supplying the information should, at that time, also provide confirmation that this has been done with the permission of the individual concerned.

At or before the time we collect personal information from you, we will take reasonable steps to inform you why we are collecting that personal information, who else we might disclose that personal information to, and what will happen if you do not provide personal information to us. Once we hold personal information we will take reasonable steps to keep it accurate, secure, complete and up-to date.

From time to time, we may take photographs and make audio and/or audiovisual recordings of students, alumni and their guests at our events and/or on our grounds and we may collect information relating to the identity of the individuals appearing in the photographs and/or recordings.

If you attend our premises, we may also collect certain contact details that you provide to us (which may be via digital check-in apps), including the date and time of attendance, including so that we can comply with applicable laws (such as public health directives).

SENSITIVE INFORMATION

We will not collect sensitive information about you without your consent, unless the collection is:

- a) required or permitted by law; or
- b) is necessary to prevent or lessen a serious or imminent threat to the life or health of any individual, and you are not physically or legally able to provide consent; or
- c) necessary for the establishment, exercise or defence of a legal or equitable claim.

OUR PURPOSES FOR HANDLING YOUR PERSONAL INFORMATION

In the course of our activities we collect, hold, use and disclose personal information for the purposes of providing courses of study and services which enable us to fulfil our mission of providing enriching residential college experiences.

We will only use and disclose your personal information when it is lawful and reasonable to do so. We will also only use and disclose your personal information:

- for the purpose for which it was collected;
- for a purpose related to (or, in the case of health or sensitive information, directly related to) the purpose for which it was collected;
- for other purposes to which you have consented; or
- as otherwise permitted, required or authorised by law (for example, if necessary on health or public safety grounds or in response to a request from an enforcement body (e.g. the police)).

Personal information supplied to University College may be used by its staff in conducting the business of the College. Some of the specific purposes for which we collect, hold, use and disclose information include:

- student administration;
- provision of requested information or services, including residential services;
- to comply with our legal and regulatory obligations;
- to assess your performance or conduct and to manage any investigation;
- to collect and process fee payments and donations;
- to address any issues or complaints that we or you have regarding our relationship;
- the dissemination of information to staff, prospective and current students;
- remaining in contact with people who have had an affiliation with us; and
- to contact you regarding the above, including via electronic messaging such as SMS and email, by mail, by phone or in any other lawful manner.

WHEN WE MAY DISCLOSE PERSONAL INFORMATION

Examples of instances when personal information about you may be disclosed are:

- when contacting advisers, tutors or other individuals who assist us in providing services to you;
- when contacting your University or other organisations (such as other Colleges) who assist us in providing services to you;
- contacting your nominated representatives, referees or emergency contacts;
- when required or authorised by law to disclose to government or regulatory entities;
- informing Centrelink of your enrolment details if you are in receipt of payments;
- check aspects of your immigration status in Australia through DHA's Verification of Visa Online (VEVO);
- assisting the police with personal information about you if you are alleged to have been involved in a criminal offence;

- to our suppliers, contractors and organisations that provide us with technical and support services;
- to our accountants, insurers, lawyers, auditors and other professional advisers when seeking advice in relation to our activities, our services or when dealing with complaints or investigations; and
- publishing names, news and photos of alumni and friends of the College.

When we publish newsletters, publications, brochures and other materials (in print and online) which include photographs and/or recordings of students, alumni and/or their guests at our events and/or on our grounds, they may disclose information that identifies those students, alumni and/or guests (including by printing the name(s) of individuals in the photographs or recordings).

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

ACCESS AND CORRECTION

General

Please contact our Privacy Officer (contact details below) if you would like to access or correct the personal information that we hold about you. We may ask you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

Access

We will generally provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (e.g. by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

Correction

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

Timing

Except in the case of more complicated requests, we will endeavour to respond to access and correction requests within 45 days.

What if we do not agree to your request for access or correction?

If we do not agree to your access or correction request, or if we do not agree to give you access in the manner you requested, we will provide you with a written notice setting out the reasons for our decision (except to the extent that, having regard to the grounds for refusal, it would be unreasonable to do so).

In addition, if we refuse to correct personal information in the manner you have requested, you may ask us to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and we will take reasonable

steps to do this in such a way that will make the statement apparent to users of the information.

DATA SECURITY AND STORAGE

The College holds personal information on electronic and paper based records. We take all reasonable steps to ensure that the personal information we hold is accurate and complete and that it is protected from unauthorised access, modification, disclosure, misuse and loss. Except where it is required to be retained by law, we will destroy or permanently de-identify personal information we no longer need.

UNIQUE IDENTIFIERS

We will not assign unique identifiers or adopt as our own any identifiers that you may provide to us, such as TFNs or Medicare numbers, unless the assignment of identifiers is necessary to enable us to carry out any of our functions efficiently.

ANONYMITY

Wherever it is lawful and practicable, individuals have the option of not identifying themselves when contacting us. The nature of the business carried on by us means that, generally, it is not possible for us to provide services to student or staff members in an anonymous way.

TRANSFERRING INFORMATION OUTSIDE OF AUSTRALIA

From time to time, we may need to send information outside of Australia where it is necessary to do so, for example, where a student has a parent who lives overseas. In addition, some of the third parties (for example, service providers) to whom we disclose personal information may also be located outside Australia. The countries in which such third party recipients are located depend on the circumstances. In the ordinary course of business we commonly disclose personal information to recipients located in USA, Singapore and New Zealand.

COOKIES

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We may use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing our website. This information will help to better adapt the website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual. We may also use third party vendors to show our ads on sites on the Internet and serve these ads based on a user's prior visits to our website. We may also use analytics data supplied by these vendors to inform and optimise our ad campaigns based on your prior visits to our website.

5. WORKERS OF THE COLLEGE

- 5.1 We collect information in relation to employees as part of their application and during the course of their employment, either from them or in some cases from third parties such as recruitment agencies. Such information may include contact details, qualifications, resume, current and former employment details, pay rate and salary, bank details, feedback from supervisors, training records and logs of usage of our equipment (e.g. phones; computers).

Under the Privacy Act, personal information about a current or former employee may be held, used or disclosed in any way that is directly connected to the employment relationship. We handle employee information in accordance with legal requirements and our applicable policies in force from time to time.

6. COMPLAINTS RESOLUTION

- 6.1 We are committed to providing to the University College community and to other parties whose personal information we hold, a fair and responsible system for the handling of their complaints. If at any time you have any complaints in relation to privacy, including if you believe we have breached the APPs, please contact our Privacy Officer via the details below. We will seek to address any concerns that you have through our complaints handling processes.

When contacting us please provide as much detail as possible in relation to your concern or complaint.

We take all complaints seriously, and will respond to your complaint within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are dissatisfied with the handling of your complaint, you may refer your concerns to the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5218, Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

7. PRIVACY OFFICER

The Privacy Officer is The Commercial Manager who can be contacted by email commercialmanager@unicol.unimelb.edu.au.

8. COMMUNICATION AND IMPLEMENTATION OF POLICY

- 8.1 This Policy is available on the College's website and is communicated to all Residents and Workers in their Contracts and during their Orientation and Induction. This Policy will be reviewed in accordance with the Policy Review Schedule.

9. RELEVANT LEGISLATION AND DOCUMENTS

9.1 Further Information

Further information relating to Privacy may be by visiting the web site of the Office of the Australian Information Commissioner (OAIC) at <https://www.oaic.gov.au/>

9.2 Relevant Legislation

- *Privacy Act 1988* (Cth)
- *Health Records Act 2001* (Vic)

9.3 Related UC Policies

- Archives Policy

10. DEFINITIONS

TERMS AND DEFINITIONS

Resident means any student or staff residing at the College.

Visitor means

- Invitees of University College;
- Guests of residents or workers;
- Member of the University College Council (and any guests of such persons);
- Parents, volunteers, alumni (and any guests of such persons);
- Conference attendees (and any guests of such persons);
- Apartment guests (and any guests of such persons); or
- Any other person including members of the public who enter University College.

Worker means a representative or agent of the College, an employee, contractor or subcontractor, an employee of a labour hire company who has been assigned to work at the College, an outworker, an apprentice or trainee, a student gaining work experience, a volunteer or a prospective employee of the College.

APPROVAL AND REVIEW DETAILS

Approval and Policy Owner	Details
Approval Authority	Council
Advisory Committee to Approval Authority	Governance Committee
Policy Owners	Commercial Manager
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V1	2022	Original	Council
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