

1. Purpose

This Privacy Policy outlines how the Country Universities Centre Norfolk Island (CUCNI) collects, uses, discloses, and manages personal information obtained from individuals who engage with services offered. CUCNI is committed to complying with the *Privacy Act 1988* (Cth), maintaining robust governance, risk management and security practices to ensure personal information is handled lawfully, fairly and transparently.

2. Scope

This policy applies to CUCNI:

- Staff,
- Students,
- Board members,
- Data collection, maintenance, and retention of personal information.

3. Policy

A. Definitions

Data Breach: An incident where personal information is lost, accessed, or disclosed without authorisation.

Doxxing: The intentional online exposure of an individual's identity, private information or personal details without their consent with the intent of causing harm.

Informed consent: When a person understands what they're being asked, and they give their permission clearly and freely – without feeling pressured.

Personal Information: Any information or opinion about an identified individual or an individual who is reasonably identifiable.

Sensitive Information: Includes information such as racial or ethnic origin, political opinions, religious beliefs, or health information.

Third-Party Providers: Organisations or individuals engaged in formal arrangements with CUCNI to provide services, support operations, or collaborate/partner to achieve shared objectives.

B. Principles

CUCNI is bound by laws which impose specific obligations when it comes to handling information and has adopted the following principles contained as minimum standards in relation to handling personal information.



CUCNI will:

- Collect only information which the organisation requires for its primary function,
- Ensure that people whose personal information is collected are informed on what is being collected, why, and how it is stored and used,
- Use and disclose personal information only for CUCNI primary functions or a directly related purpose, or for another purpose with the person's consent,
- Store personal information securely, protecting it from unauthorised access,
- Provide people with access to their own information, and the right to seek its correction, and
- Have a plan for what to do in the event there is a data breach.

Privacy considerations are embedded into all new projects, systems and processes. Where high-risk activities take place, Privacy Impact Assessments (PIAs) are conducted, including those involving children's data, biometric information or automated decision-making.

CUCNI staff receive training on appropriate collection, storage and use of personal data in the Salesforce database, and are informed of this policy and CUCNI expectations regarding respectful and lawful use of personal information.

C. Collection of Information

CUCNI is committed to protecting the privacy of personal information it collects, holds, and administers. CUCNI collects and maintains a range of personal and sensitive information for the purposes of administration and governance. Information is collected through various channels, including but not limited to,

- Direct interactions (e.g., meetings, phone calls, emails).
- Website usage, registration forms, and cookies.
- Surveys, events, and third-party providers.

Types of Information Collected

CUCNI collects the following types of information to ensure effective service delivery and compliance with legal obligations:

1. Personal Information

- Full name
- Address
- Phone number
- Email address
- Emergency contact
- Gender
- Date of birth

2. Student Enrolment Information

- Education institution
- Course
- Subjects
- Mode of study
- Institution ID
- Unique Student Identifier (USI)

3. Sensitive Information (Collected with Consent or as Required by Law)



- Language or cultural background
- Citizenship status
- Status as an Indigenous Australian
- Disability status
- Health and medical information

4. **Professional and Academic Information**

- Academic history and qualifications
- Professional certifications or licenses
- Current and previous employment details

5. **Engagement and Participation**

- Attendance records for workshops, events, or sessions
- Survey responses or feedback

6. **Emergency Preparedness Information**

- Allergies or dietary restrictions for event planning
- Emergency evacuation needs or mobility considerations
- Emergency contact data

7. **Parental or Guardian Information** (if applicable)

- Name and contact details of parents/guardians
- Legal custody or guardianship documentation

8. **Media and Visual Information**

- Collection of photographs and video recordings taken during events, workshops, or other activities for operational, promotional, and archival purposes
- Consent for use of photographs, videos, or testimonials in promotional materials

D. **Use of Information**

CUCNI may use personal information for the following purposes:

- Providing educational services, including academic support and resources.
- Administering registrations and managing student records.
- Communicating with individuals about CUCNI services.
- Conducting research and statistical analysis for educational purposes.
- Complying with legal and regulatory obligations.

E. **Disclosure of Information**

CUCNI may disclose personal information to third parties in the following circumstances:

- Service providers and contractors assisting with CUC operations.
- Government authorities and regulatory bodies as required by law.
- Education providers with whom individual students are currently enrolled.
- Other centres within the CUC network.
- CUC Central Team for administrative purposes.



CUCNI prohibits the unauthorised disclosure of personal information, including any conduct that may constitute doxxing. Staff must not publish or share personal information with intent to cause harm, distress or disadvantage.

F. Quality of Information

CUCNI is committed to ensuring that the personal information it collects is accurate, up-to-date, and complete. To achieve this, CUCNI:

- Records information in a consistent and standardised format.
- Confirms the accuracy of information collected from third parties or public sources, where necessary.
- Promptly updates or adds new personal information to existing records.
- Periodically audits contact lists and other records to check their accuracy and relevance.
- Reviews the quality of personal information prior to its use or disclosure to ensure it is fit for purpose.

These measures are integral to maintaining the integrity of personal information and ensuring compliance with privacy obligations.

G. Information Management

CUCNI recognises the essential right of individuals to have their information administered in ways that they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies.

CUCNI recognises that individuals now have a statutory right to seek redress for serious invasions of privacy and takes all reasonable steps to prevent intrusions into personal privacy, including through secure systems, restricted access, and clear behavioural expectations for staff.

Additionally, CUCNI applies heightened protections to the personal information of children and young people, ensuring that collection, use and disclosure of young person's information is limited, necessary, transparent and supported by appropriate consent.

Where CUCNI uses automated tools or systems to support decision-making, individuals will be informed about the use of automation, the types of information involved, and the factors that influence outcomes. Individuals may request human review of decisions that affect them.

If there is a concern regarding the mishandling of information, this may be raised informally or formally as a grievance with the Centre Manager and/or Board of Directors.

H. Data Security

CUCNI implements reasonable security measures to protect personal information from unauthorised access, misuse, loss, or disclosure. To protect all information CUCNI has implemented measures that include:

- Advanced encryption technologies for data transmission and storage,
- Strict access controls to ensure only authorised personnel can access personal information,
- Regular security audits and updates to IT systems, and
- Physical security measures at premises to prevent unauthorised access to physical records.



In the unlikely event of a data breach, CUCNI has a comprehensive response plan aligned with the Notifiable Data Breaches scheme. This plan includes immediate actions to secure the data, assess the impact, and notify affected individuals and the Office of the Australian Information Commissioner if necessary.

I. Retention

Personal information is only retained for as long as necessary to fulfill the purposes outlined in this policy or as required by law. In most cases, data will only be retained for a period of 7 years after the person to whom the data belongs to is no longer connected to CUCNI. There are exceptions to cases regarding information relating to child safety concerns and incidents.

J. Access and Correction to Information

Individuals have the right to access and request correction of their personal information held by CUCNI, in accordance with applicable privacy laws and CUCNI's commitment to transparency and accountability. Requests for access to personal information may include obtaining details about what information is held, how it is being used, and to whom it may have been disclosed. Similarly, individuals may request corrections to ensure their personal information is accurate, complete, and up to date. All such requests should be directed to the Centre Manager as the primary point of contact. The Centre Manager will facilitate this by verifying the requester's identity, reviewing the request, and taking appropriate action in line with this policy. Where a correction cannot be made, the individual will be informed of the reasons and right to lodge a grievance or seek further review.

4. Resources

- [Australian Privacy Principles](#)
- [Notifiable Data Breaches](#)
- [Privacy Act 1988 \(Cth\)](#)