



HEATHDALE CHRISTIAN COLLEGE LTD

GP 03.1 PRIVACY POLICY

July, 2015

This policy supersedes the following Policy and Guideline:

- Privacy Policy April 2002
- Privacy Guidelines V1 April 2002

PURPOSE:

To enable careful and reasonable handling of personal information to maintain privacy while effectively carrying out the school's functions and activities.

SCOPE:

To enable careful and reasonable handling of personal information to maintain privacy while effectively carrying out the school's functions and activities.

1. Privacy is important

This Policy outlines how the College uses and manages personal information provided to or collected by it.

The College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. In relation to health records, the College is also bound by the Victorian Health Privacy Principles which are contained in the Health Records Act 2001 (Vic)

The College may, from time to time, review and update this Privacy Guideline to take account of new laws and technology, changes to the Colleges' operations and practices and to make sure it remains appropriate to the changing College environment.

2. What kind of personal information does the College collect and how does the College collect it?

The type of information the College collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- pupils and parents and/or guardians ('**Parents**') before, during and after the course of a pupil's enrolment at the College;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the College.

Policy GP 03.1

Date: 29 July 2015

Decisions 15033

Signed: _____ (Chairman)

Print name: Trevor Sawyer (Chairman)

2.1. **Personal Information provided by parents:** The College will generally collect personal information held about an individual by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, and telephone calls. On occasions people other than Parents and pupils provide personal information.

2.2. **Personal Information provided by other people:** In some circumstances the College may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another College.

2.3. **Exception in relation to employee records:** Under the Privacy Act the National Privacy Principles do not apply to an employee's record. As a result, this Privacy Policy does not apply to the College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee.

3. How will the College use the personal information provided by Parents?

The College will use personal information it collects from parents/guardians for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

3.1. **Pupils and Parents:** In relation to personal information of pupils and Parents, the College's primary purpose of collection is to enable the College to provide schooling for the pupil. This includes satisfying both the needs of Parents and the needs of the pupil throughout the whole period the pupil is enrolled at the College.

The purposes for which the College uses personal information of pupils and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after pupils' educational, social and medical well being;
- seeking donations and marketing for the College;

- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

In some cases where the College requests personal information about a pupil or Parent, if the information requested is not obtained, the College may not be able to enroll or continue the enrolment of the pupil.

3.2. Job applicants, staff members and contractors: In relation to personal information of job applicants, staff members and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the College uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for the College;
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

3.3. Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as the Heathdale Past Students Association, to enable the College and the volunteers to work together.

3.4. Marketing and fundraising: The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to be a quality learning environment in which both pupils and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising, for example, the Heathdale Past Students Association.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

4. Who might the College disclose personal information to?

The College may disclose personal information, including sensitive information, held about an individual to:

- another school/college;
- government departments;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers and sports coaches;
- recipients of College publications, like newsletters and magazines;
- Parents; and
- a third party as long as the person giving the information to us has authorised us to do so.

4.1. ***Sending information overseas:*** The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia or to facilitate a College exchange. However, the College will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the National Privacy Principles.

5. How does the College treat sensitive information?

In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

6. Management and security of personal information

The College's staff are required to respect the confidentiality of pupils', staff and Parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information the College holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

7. Access and correction of personal information

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Pupils will generally have access to their personal information through their Parents, but older pupils may seek access themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or update any information the College holds an application in writing needs to be made to the Principal. The College may require verification of identity and specify what information is required. The College may charge a fee to cover the cost of verifying an application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance. If the College cannot provide access to that information, the College will provide written notice explaining the reason for refusal.

8. Consent and rights of access to the personal information of pupils

The College respects every Parent's right to make decisions concerning their child's education.

Generally, the College will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. The College will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the Principal. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the College's duty of care to the pupil.

The College may, at its discretion, on the request of a pupil grant that pupil access to information held by the College about them, or allow a pupil to give or withhold consent to the use of their personal information, independently of their Parents. This would normally be done only when the maturity of the pupil and/or the pupil's personal circumstances so warranted.

9. Enquiries

If further information is required about the way the College manages personal information it holds, or wish to complain that the College has breached the Australian Privacy Principles, please contact the Principal. The College will investigate any complaint and will notify a decision in relation to a complaint as soon as practicable.

ACCOUNTABILITIES

Role	Accountabilities
Principal	Provide resources so that systems and facilities for holding and using personal information maintain privacy. Monitor complaints about privacy to ensure satisfactory resolution.
Business Manager	Ensure processes are in place to provide for secure handling of personal information, both in hard copy and computer databases, so privacy of the information is maintained. Provide for information to be kept up-to-date, corrected where necessary, and destroyed once it is no longer needed.
Enrolment Officer	Receive and respond to requests for access to personal information. Provide written reasons if access is to be refused. Receive and resolve any complaints about privacy.
Staff	Never access and use personal information unless it is required to do your work. Maintain the privacy of personal information, including information you know even though it isn't written down.

DEFINITIONS

Term	Definition
Personal information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable: <ul style="list-style-type: none">• whether the information or opinion is true or not; and• whether the information or opinion is recorded in a material form or not.

REFERENCES

Legislative and other external references

- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (includes Australian Privacy Principles in Schedule 1).
- Health Records Act 2001 (Vic) which includes the Victorian Health Privacy Principles.

APPENDIX 1

REGISTER OF HEATHDALE CHRISTIAN COLLEGE PRIVACY NOTICES

- Application for Enrolment Privacy Notice
- Application for Employment Privacy Notice
- Past Students Association Privacy Notice
- Contractor/Volunteer Privacy Notice.

APPENDIX 1

REGISTER OF HEATHDALE CHRISTIAN COLLEGE PRIVACY NOTICES

- Application for Enrolment Privacy Notice
- Application for Employment Privacy Notice
- Past Students Association Privacy Notice
- Contractor/Volunteer Privacy Notice.

Application for Enrolment Privacy Notice

1. The College collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a pupil's enrolment at the College. The primary purpose of collecting this information is to enable the College to provide schooling for your son/daughter.

2. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.

3. Certain laws governing or relating to the operation of schools require that certain information is collected. These include Public Health and Child Protection laws.

4. Health information about pupils is sensitive information within the terms of the National Privacy Principles under the Privacy Act. We ask you to provide medical reports about pupils from time to time.

5. The College from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes to other schools, government departments, medical practitioners, and people providing services to the College, including specialist visiting teachers, sports coaches and volunteers.

6. If we do not obtain the information referred to above we may not be able to enroll or continue the enrolment of your son/daughter.

7. Personal information collected from pupils is regularly disclosed to their parents or guardians. On occasions information such as academic and sporting achievements, pupil activities and other news is published in College newsletters, magazines.

8. Parents may seek access to personal information collected about them and their son/daughter by contacting the College. Pupils may also seek access to personal information about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the pupil, or where pupils have provided information in confidence.

Policy GP 03.1

Date: 29 July 2015

Decisions 15033

Signed: _____ (Chairman)

Print name: Trevor Sawyer (Chairman)

9. As you may know the College from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the College's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.

10. We may include your contact details in a class list and College directory. If you do not agree to this you must advise us now.

11. If you provide the College with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.

Application for Employment Privacy Notice

1. In applying for this position you will be providing Heathdale Christian College with personal information. We can be contacted by post at PO Box 1042 Werribee Plaza VIC 3030, or by telephone on (03)9749-1522, or by e-mail at enquires@heathdale.vic.edu.au

2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application.

3. You agree that we may store this information for 3 months.

4. You may seek access to your personal information that we hold about you if you are unsuccessful for the position. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.

5. We will not disclose this information to a third party without your consent.

6. We have a College policy that requires us to conduct a criminal record check.

7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish, that the College does not usually disclose the information to third parties and that we may store their information for 3 months.

Past Students Association Privacy Notice

1. The Heathdale Christian College Past Students Association may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of Heathdale Christian College and to keep past student members informed about other members.
2. We must have the information referred to above to enable us to continue your association with Heathdale Christian College Past Students Association.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. If you do not agree to this, please advise us now.
4. Heathdale Christian College Past Students Association may publish details about you in our Newsletter. If you do not agree to this you must advise us now.
5. You may seek access to personal information collected about you by contacting us, care of the College.
6. If you provide personal information to us about other people, we encourage you to inform them of the above matters.

Contractor / Volunteer Privacy Notice

1. In applying to provide your services you will be providing Heathdale Christian College with personal information. We can be contacted by post at PO Box 1042 Werribee Plaza VIC 3030, or by telephone on (03)9749-1522, or by e-mail at enquires@heathdale.vic.edu.au.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for 3 months.
4. Access to this information may be available to you if you ask the College for it.
5. We will not disclose this information to a third party without your consent.
6. We have a College policy that requires us to conduct a criminal record check.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.

Policy GP 03.1

Date: 29 July 2015

Decisions 15033

Signed: _____ (Chairman)

Print name: Trevor Sawyer (Chairman)