

# *Privacy Policy*



ST ANDREWS  
CHRISTIAN COLLEGE

INSPIRED BY  
FAITH

DISTINGUISHED BY  
CHARACTER

LEADERS BY  
INFLUENCE



# Privacy Policy

## PREAMBLE

All policy, protocols and procedures flow from the St Andrews Christian College Mission Statement:

*“To educate our students so that they are well skilled, understand life on the basis of biblical truth, and are motivated to walk with God and serve Him in their lives, so that they will be a positive Christian influence in the world.”*

## POLICY DOCUMENT INFORMATION

<b>TITLE:</b>	Privacy Policy
<b>AUTHORS:</b>	D. Waterworth; S Leslie
<b>ACKNOWLEDGEMENTS:</b>	ISV Privacy Compliance Manual (11/19)
<b>PURPOSE:</b>	To provide policy and direction for all the College Community.
<b>RELATED DOCUMENTS:</b>	Communication Policy and Protocols Freedom of Information Act Health Records Act 2001 (Vic) National Privacy Principles Privacy Act 1988

## KEY DATES

<b>ISSUE DATE:</b>	November, 2020
<b>REVIEW DATE:</b>	2023



## 1. RATIONALE

This Privacy Policy sets out how St Andrews Christian College manages three types of information provided to or collected by it.

The College is bound by the Australian Privacy Principles contained in the Commonwealth *Privacy Act 1988*. In relation to health records, the College is also bound by the Health Privacy Principles which are contained in the *Health Records Act 2001* (Vic). The College follows the advice provided in the Privacy Compliance Manual developed by the Independent Schools Council of Australia and the National Catholic Education Commission. This policy reflects the updates published in November, 2019.

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

## 2. COLLECTION OF INFORMATION

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

- Students and parents/guardians ('parents') before, during and after the course of a student's enrolment at the College;
- Job applicants, staff members, volunteers and contractors; and
- Other people who come into contact with the College.

### 2.1 Personal Information You Provide

The College will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents and students 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 Exceptions In Relation To Employee Records

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee 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. The College handles staff health records in accordance with the Health Privacy Principles in the Health Records Act. The College generally only uses personal information for the primary purpose for which the information was collected or a secondary purpose when permitted by the Privacy Act. Generally, the School collects personal information for the purpose of facilitating its ability to function as an educational institution.

## 3. USE OF PERSONAL INFORMATION

The College only uses personal information for the primary purpose for which the information was collected or a secondary purpose which is related to the primary purpose of collection and reasonably expected by you or to which you have consented.

### 3.1 Students and Parents



In relation to personal information of students and parents, the College's primary purpose of collection is to enable the College to provide schooling to students enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College. This includes satisfying the needs of parents, the needs of the pupil and the needs of the College throughout the whole period the pupil is enrolled at the College.

The purposes for which the College uses personal information of students and parents include:

- To keep parents informed about matters related to their child's education, through correspondence, newsletters and magazines;
- Day-to-day administration of the College;
- Looking after students' educational, social and medical wellbeing;
- Seeking donations and marketing for the College; and
- 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 provided, the College may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity.

## 4. JOB APPLICANTS, STAFF MEMBERS AND CONTRACTORS

In relation to personal information of job applicants and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be. The purposes for which the College uses personal information of job applicants and contractors include:

- Administering the individual's employment or contract, as the case may be;
- For insurance purposes;
- Seeking donations and marketing for the College; and
- Satisfying the College's legal obligations, for example, in relation to child protection legislation.

## 5. VOLUNTEERS/VISITORS

The College also obtains personal information about volunteers who assist the College in its functions or associated activities, to enable the College and the volunteers to work together. We collect personal information of volunteers and visitors to adhere to our *Child Protection Policy including the Child-safe Code of Conduct and Reporting Procedures*.

## 6. MARKETING AND FUNDRAISING

Marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the PFA or alumni organisation or on occasions, external fundraising organisations.

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.

## 7. DISCLOSURE AND STORAGE OF PERSONAL INFORMATION



The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include disclosing information to:

- Another college, as required;
- Government departments;
- Medical practitioners;
- People providing support and services to the College, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools;
- Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority;
- People providing administrative and financial services to the College;
- Recipients of College publications, such as newsletters and magazines;
- Students, parents or guardians, as appropriate;
- Anyone you authorise the College to disclose information to; and
- Anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

The College may disclose personal information about an individual to overseas recipients, for instance, 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 Australian Privacy Principles or other applicable privacy legislation.

The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service-provider's server which may be situated outside Australia.

The College uses the following third-party applications for the purpose of storing personal information:

- Synergetic – the College Management System;
- Operoo – medical and personal information;
- 'the hub' – the College name for Schoolbox, the learning management tool.

## TREATMENT OF 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, philosophical beliefs, sexual orientation or practices or criminal record, that which is personal information; health information and biometric information about an individual.

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



## 8. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

The College's staff are required to respect the confidentiality of students' 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, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

## 9. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Under the Commonwealth *Privacy Act 1988* and the Health Privacy Principles contained in the *Health Records Act 2001* (Vic), an individual has the right to seek and obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves. There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or to update any personal information the College holds about you or your child, please contact the College Principal or Business Manager by telephone or in writing. The College may require you to verify your identity and specify what information you require. The College may charge a fee to cover the cost of verifying your 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 we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

## 10. CONSENT AND RIGHTS OF ACCESS TO PERSONAL INFORMATION OF STUDENTS

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.

Parents may seek access to personal information held by the College about them or their child by contacting the College Principal or Business Manager by telephone or in writing. However, there may 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 warrant it.

## 11. ENQUIRIES AND COMPLAINTS

If you would like further information about the way the College manages the personal information it holds, or wish to complain that you believe the College has breached the Australian Privacy Principles please contact the College Principal by writing or telephone at (03) 8847 8300. The College will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.



The College's Complaints Management and Investigation Process is for all members of the College community and is accessible from the website.

## 12. ANONYMITY AND PSEUDONYMITY

In some circumstances (for example, whistle-blowing) an individual may wish to have the option of not identifying themselves or using a pseudonym. The College allows such an option unless the college is required by law to know the identity of the person, or it is impractical to deal with the complaint of an individual who has not identified themselves.

## 13. STAFF TRAINING

Compliance with the Privacy Act and the Australian Privacy Principles depends on the awareness and conduct of College staff. To ensure compliance the College will:

- Ensure all staff members have access to this Policy and are required to read and comply with it;
- Inform staff of the requirements of confidentiality;
- Brief staff on the key concepts of this Policy as part of the professional development program.