



Cooloola Christian College

PRIVACY POLICY

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| Policy: | Board | |
| Purpose: | To guide the collection, use and disclosure of personal information in relation to the College. | |
| Scope: | This policy applies to Board members, staff, volunteers, parents/guardians and students, contractors, people visiting the College and people communicating with the College. | |
| Status: | Adopted: March 2014 Reviewed: May 2019 | Supersedes: Privacy Policy, 2015 |
| Authorised by: | Board Chair | Date: |
| References: | <i>Privacy Act 1998</i> <i>Australian Privacy Principles</i> | |
| Review Frequency: | Every 3 Years | Next Review Date: May 2022 |

POLICY STATEMENT

Cooloola Christian College is bound by 13 Australian Privacy Principles contained in the *Privacy Act 1998*. The College may, from time to time, review and update this policy to take into account new laws and technology, changes to operations and practices and to ensure its relevance in an evolving school environment.

COLLECTION OF INFORMATION

1. Collecting and recording information

The primary purpose for collecting and recording information is to enable the provision of quality education in a Christian framework. In addition, some of the information that is collected and recorded is to satisfy the College's legal obligations, and to enable the College to discharge its duty of care to students and parents/guardians.

2. Who does the College seek information from?

The College collects and holds personal information, sensitive and health information, about:

- Students and parents/guardians 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 school.

3. Method of Collection

The College will generally collect personal information by way of forms (fill out by parents/guardians or students), face-to-face meetings, interviews, and phone calls. On occasions, people other than parents and students provide personal information. 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, a reference from another school, or a Family Court Order. Unsolicited information provided to the College by third parties will be destroyed unless there is legal requirement to keep it.

4. Purposes for Collection

4a. From families

The primary purpose for which the College uses personal information (such as name, address, contact numbers, date of birth) is to assess and respond to the educational needs of students.

The secondary purposes include:

- To keep parents informed about matters relating to their child's schooling, through correspondence, newsletter and magazines;
- Day-to-day administration;
- Student social and medical wellbeing;
- Fee payment;
- Assessing hardship requests;
- Seeking donations and marketing for the College; and
- Satisfying the College's legal obligations and allowing the College to discharge its duty of care.

Full and frank disclosure is a fundamental requirement without which the initial and/or ongoing enrolment of the student may be compromised.

4b. From job applicants, staff members and contractors

In relation to personal information of job applicants, staff members and contractors, the College's primary purpose for collection is to assess, and if successful to engage, the applicant, staff member or contractor.

The secondary purposes for include:

- Administering the individual's employment or contract;
- Insurance;
- Seeking funds and marketing for the College;
- Conducting ID and teacher registration checks; and
- Satisfying the College's legal obligations, for example, in relation to child protection legislation.

The Australian Privacy Principles do not protect information about an employee's employment history.

4c. From volunteers

The College obtains personal information about volunteers who assist the College in its functions or conduct associated activities.

4d. For College-based publications

College-based publications, such as newsletters and magazines, including identification and information about students unless media consent has not been given by the parent/guardian.

4e. For marketing and fundraising

Marketing and donations are important for the future growth and development of the College to ensure that the College continues to be a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising.

Images and names of students will not be used for marketing purposes **without the express consent of parents/guardians**.

5. Management and security of personal information

The College staff members are required to respect the confidentiality of personal information held at the College, including that of students, parents and other staff members.

The College protects the personal information it holds from misuse, loss, unauthorised access, modification or disclosure, by use of various methods including locked storage of paper records and password protected digital records.

6. Management and security of personal information

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

Sensitive information includes: racial or ethnic origin, political opinions, religion, trade union or other professional/trade association membership, sexual preference, criminal record or health information.

7. Management and security of personal information

The College may disclose personal information about a person to an overseas recipient to allow storing information with “cloud” service providers outside of Australia, or to facilitate a school student exchange. 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 being reasonably satisfied that the recipient is subject to a law-binding contract which complies with or substantially reflects the Australia Privacy Principles.

8. Updating and correction of personal information

The College will endeavour to ensure that the personal information it holds is accurate, complete and up to date. A person may seek to update their personal information held by the College by contacting the College Administration Office.

The Australia Privacy Principles require the College not to store personal information longer than necessary and to take steps to deidentify personal information no longer needed for any expressed purpose.

9. Access to information

Under the *Privacy Act 1998*, an individual has the right to seek access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. Exceptions apply where the privacy of others or the College’s duty of care may be compromised.

Students will generally have access to their personal information through their parents/guardians, but old students may seek access themselves. Requests to access any personal information the College holds must be made in writing to the College Administration Office. Verification of identify is required as well as the information requested. The College may charge a fee to cover the cost of processing the request which could include reproducing documents or other materials.

10. Disclosure of information

The College will disclose information where the person consents to disclosure. It may also disclose personal information, including sensitive information held about an individual to:

- Another school;
- Government department/s;
- Medical practitioner;
- Public Health, Safety or Police authorities;
- People providing services to the College, including specialist teachers and coaches;
- Law enforcement authorities;
- Recipients of College publications;
- Parents; and
- Anyone authorised the College to disclose information to.

11. Photographs

Photographs or video footage are often taken at school activities and events including camps, excursions, sports days by a member of staff, a parent, student, volunteer or other persons present at the time.

As these “media records” are taken by staff or others invited onto the school grounds, or camp/excursion, we trust that there will not be an abuse or misuse of media processes and that all records are shared with a limited school-based audience. If digital media content is provided to the College, it will be used according to privacy requirements and only in school-related materials.

Parents and non-staff are alerted to privacy limitation upon use and sharing of images.

Persons who are “employed” by the College and who take private photographs or other media records whilst on a camp, excursion, at a sporting event or similar activity, are to be aware that breaches of the *Privacy Act 1998* may be reported and may attract sanctions.

Employees are encouraged to take reasonable precautions and seek appropriate permission to take or use any photographs or similar media records featuring students.

12. Making a complaint

Complaints regarding the use of personal information can be made to the Principal of the College.

Complaints can also be made to the Office of the Australian Information Commissioner. This process is free of charge. It is recommended that concerns are first discussed at a College level.

Information is available at www.oaic.gov.au or phone 1300 363 992.