

## **PRIVACY POLICY**

### **PURPOSE**

This statement outlines the Rivergum Christian College's policy on how the College uses and manages personal information provided to or collected by it.

The College adheres to the *Australian Privacy Principles (APPs)* that replaced the National Privacy Principles and the Information Privacy Principles in March 2014. 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.

### **POLICY IMPLEMENTATION**

#### **Collection and Consent**

It is necessary for the College's function to collect personal information. All personal information collected is managed in an open and transparent way. The College ensures that in collecting personal information, consent is given by individuals first. All forms collecting personal information have an acknowledgement section whereby the individual signs to consent for collection of personal information. At the time of collection, the College also notifies the individual the reasons why the College collects information and whom it may be shared with, at the time, before or as soon as practicable after collection.

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

- students and parents and/or 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
- medical information through first aid/ sick bay and PE / fitness

#### **To whom might the College disclose personal information?**

The College collects personal information for the primary purpose of schooling. Occasions may arise where requests are made to disclose personal information held about an individual, to other organization or individuals. Consent should be obtained from the parent / guardian / individual prior to sharing information. Some examples are:

- another school
- 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

There is an exception to obtaining consent where the individual would expect such information to be disclosed or used for another purpose. For a purpose that is directly related to the reason the information was collected and the use would be reasonably expected by the individual and there is no reason to believe they would object to the disclosure.

The College can disclose personal information for another purpose when:

- the person consents
- it is necessary to lessen or prevent serious or imminent threat to life, health or safety
- is required by law or for law enforcement purposes

### **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 the individual concerned agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

### **Personal Information provided**

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.

### **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.

### **How will the College use the personal information parents and carers provide?**

The College will use personal information it collects 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 consent has been given. If the information is needed to be used for another purpose, or if it needs to be disclosed to another party, consent would be obtained from the individual first, unless it would be reasonably expected from the individual. This exception does not apply where information is sensitive.

### **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 for the student. This includes satisfying both the needs of parents and the needs of the student throughout the whole period the student is enrolled at the College.

The purposes for which the College uses personal information of student 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 students' educational, social and medical wellbeing
- seeking donations and marketing for the College
- to satisfy the College's legal obligations and allow it to discharge its duty of care.

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

### **Volunteers**

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as the Parents and Friends Committee, to enable the College and the volunteers to work together.

### **Marketing and fund raising**

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 students and staff thrive. Parents, staff, contractors and other members of the wider College community may from time to time seek fund raising information. College publications, like newsletters and magazines, which include personal information, may be requested to be used for marketing purposes.



However, personal information held by the College will only be disclosed to an organisation that assists in the College's fund raising, for example, the College's Foundation or alumni organization, where an exemption applies.

In this instance, the College ensures that:

- consent has been given by the individual
- or an individual reasonably expects the College to disclose information for that purpose
- or the College provides a simple way to "opt out" if the request has not previously been made.

### **Management and security of personal information**

Rivergum Christian College staff respects 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, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records. Personal Information is destroyed or de-identified when it is no longer needed for any purpose for which it may be used or disclosed, and that it is not required by law to be retained.

### **Parents/Caregivers have the right to check what personal information the College holds about them/their children**

Under the Australian Privacy Principles, 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. The College takes reasonable steps to correct information that is deemed to be inaccurate, out of date, incomplete, irrelevant or misleading. All requests are responded to within a reasonable period. If the College refuses access for an individual to request their personal information, the reasons for refusal will be given, and avenues for complaints will also be advised.

Reasons for refusing the individual access to the information include:

- required or authorized by law to refuse
- threat to life, health or safety
- unreasonable impact on the privacy of other individuals
- request is frivolous or vexatious
- unlawfulness, i.e. - breach of confidence.

Students will generally have access to their personal information through their parents, but older students may seek access themselves. To make a request to access any information the College holds about parents/caregivers or their child/ren, the College Principal should be contacted in writing. The College may require parent/caregivers to verify their identity and specify what information they require. The College may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested.

### **Consent and rights of access to the 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 student to the student's parents. The College will treat consent given by parents as consent given on behalf of the student and notice to parents will act as notice given to the student. Parents may seek access to personal information held by the College about them or their child by contacting the College Principal.

The College may, at its discretion, on the request of a student grant that student access to information held by the College about them, or allow a student 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 student and/or the student's personal circumstances so warranted.



### Evaluation

This policy is to be reviewed as part of a three yearly review cycle.

Version	August 2021	
Publication Date	August 2021	
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Related Legislation and Regulatory Requirements	Australian Privacy Principles (APPs)	
Related Policies	RCC Child Protection Policy RCC Privacy Policy	
Responsibility	Principal	
Written By:	Senior Adviser to the Board	
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