

MOUNT ALVERNIA COLLEGE LIMITED

ABN 72 092 899 075

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POLICY: PRIVACY

1. Privacy is important

This Privacy Policy applies to Mount Alvernia College Limited. This statement outlines the policy on how the school uses and manages personal information provided to or collected by it.

The College is bound by the 13 Australian Privacy Principles contained in the Commonwealth Privacy Act.

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 school environment.

2. College Mission

Mount Alvernia College strives to be a community of care promoting positive human relationships and respect for the dignity of each person. The type of information and the manner in which it is collected, stored and made available for use will comply with legal requirements and recognise the intrinsic value of each individual as a child of God.

3. From whom and what kind of information is collected?

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 (hereafter referred to as '**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 school.

4. Form of Collection

The College will generally collect personal information held about an individual by way of forms completed by Parents or pupils, face-to-face meetings, interviews, and telephone calls.

Personal Information provided by other people: The College will endeavour to collect information reasonably and non-intrusively, seek or may in some circumstances 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 school.

Unsolicited information provided to the school by third parties will be destroyed unless requiring to be addressed by law

Exception in relation to employee records: Under the Privacy Act the Australia 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 school and employee.

5. The Purpose of Collection

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.

- a) **Re: Pupils and Parents:** In relation to personal information of pupils and Parents, the College's primary purpose of collection is to enable it to assess and 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 school.

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

- keeping Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after pupils' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the College;
- satisfying the College's legal obligations and allowing the school to discharge its duty of care.

Full and frank disclosure of information sought is required. If the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the pupil.

- b) **Re: 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.

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

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

- c) **Re: Volunteers:** The College also obtains personal information about volunteers who assist the school in its functions or conduct associated activities, such as the Alumnae, to

enable it and the volunteers to work together with a respect and understanding of the ethos of the College for the benefit of the students.

6. Use of Information

- a) **Information used in College-based Publications:** College-based Publications, including Newsletters will include identification and information about students unless parents have otherwise indicated in the enrolment contract or by contact with the school.
- b) **Information used for fundraising:** The College treats seeking donations for the future growth and development of the school as important parts of ensuring that the school 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 school's fundraising, for example, the College P & F Support Network or Alumnae unless the person chooses to opt out.
- c) **Information used for Marketing:** Prior to use of information for marketing purposes the College will seek additional consent from parents.

7. Disclosure of Information

- a) **To whom might the College disclose personal information?**
The College may disclose personal information, including sensitive information, held about an individual to:
 - another school;
 - government departments;
 - the local parish;
 - 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
 - anyone the College is given authorisation to disclose information to;
 - any body as required by law.
- b) **What is 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 orientation or criminal record, 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 agreed to otherwise, or the use or disclosure of the sensitive information is allowed by law.
- c) **Sending information overseas:**
The School may disclose personal information about a person to overseas recipients, for instance to allow storing information with "cloud" service providers which are situated

outside Australia, or to facilitate a school student exchange. However the School 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-abiding contract which complies with or substantially reflect the Australia Privacy Principles

8. Management and security of personal information

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

The College has in place steps to protect 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 pass worded access rights to computerised records.

9. Updating personal information

The College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information by contacting the Principal's Executive Assistant at any time.

The Australia Privacy Principles require the College not to store personal information longer than necessary.

10. The right to access what personal information the College holds

- a) 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 it 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.

To make a request to access any information the College holds about a person or their child, please contact the Principal in writing.

The College may require verification of identity and specification of what information is required. A fee may be charged to cover the cost of verifying the 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.

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.

b) **Limitation in Access**

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 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.

11. Making a Complaint

a) **Internal Complaint**

Details of any complaint should be made in writing to the Principal of the College. It is recommended that concerns are first discussed at School level, stating the details of concern and the remedy sought.

b) **External Complaint**

A person has a right to bring a Complaint to the Privacy Commissioner. The Complaint process is free of charge. Forms are available on the Australian Government Business Account Portal.

12. Review

This Policy will be reviewed every 3 years or as necessitated by law.