

PRIVACY POLICY

Introduction:

This Privacy Policy describes how Saint Spyridon College manages personal information provided to or collected by it.

Saint Spyridon College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act.

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

Your privacy is important.

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

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

- pupils and parents and/or caregivers 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.

Personal Information you provide: The College will generally collect personal information about an individual by way of forms filled out by parents/caregivers or pupils, surveys, face-to-face meetings, interviews, emails and telephone calls. On certain occasions, people other than parents/caregivers and pupils 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 school.

Exception in relation to employee records: Under the Commonwealth Privacy Act, the Australian Privacy Principles and Health 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 the employee.

How will the College use the personal information you provide?

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

Pupils and Parents/Caregivers: In relation to personal information about pupils and parents/caregivers, the College's primary purpose of collection is to enable the College to provide schooling for the pupil. This includes satisfying the needs of parents/caregivers, 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 about pupils and parents/caregivers include:

- to keep parents/caregivers informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration
- looking after the pupil's educational, social, spiritual and medical well being;
- 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/caregiver, 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.

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 donations and marketing for the College; and
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct-associated activities, to enable the College and the volunteers to work together.

Marketing and fundraising: The College treats marketing and the seeking of 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 pupils and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the College Board of Management.

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

To whom might the College disclose personal information?

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

- another school;
- government departments;
- your local parish;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers, counsellors and sports coaches;
- recipients of College publications such as newsletters and magazines;
- parents/caregivers;
- anyone you authorise the College to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

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 school 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.

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, philosophical beliefs, sexual

orientation or practices, or criminal record, that also includes 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 a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is required by law.

Management and security of personal information

Saint Spyridon College staff are required to respect the confidentiality of pupils' and parents'/caregivers' 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.

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. Pupils at Saint Spyridon College will generally be able to access and update their personal information through their parents or caregivers, but older pupils may seek access and undertake the correction themselves.

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

To make a request to access or update any personal information the College holds about you or your child, please contact the College Principal 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 can not provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

Consent and rights of access to personal information of pupils

The College respects every parent/caregiver'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 parent(s)/caregiver(s). The College will treat consent given by parents/caregivers as consent given on behalf of the pupil, and notice to parents/caregivers will act as notice given to the pupil.

As mentioned above, parents/caregivers may seek access to personal information held by the College about themselves or their child by contacting the College Principal. However, there will be occasions when access is denied. Such occasions

may 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 themselves, or allow a pupil to give or withhold consent to the use of their personal information, independently of their parents/caregivers. This would normally be done only when the maturity of the pupil and/or the pupil's personal circumstances are so warranted.

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 that the College has breached the Australian Privacy Principles please contact the College Principal. The College will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.

APPENDIX 1.

Standard Collection Notice

1. The College collects personal information, including sensitive information, about pupils and parents or caregivers 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 to the pupil and to enable them to take part in all the activities of the College.
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. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, Public Health and Child Protection laws.
4. Health information about pupils is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may 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, including to facilitate the transfer of a pupil to another school. This includes providing information to other schools, government departments, medical practitioners, and people providing services to the College, including specialist visiting teachers, coaches, volunteers and counsellors.
6. Personal information collected from pupils is regularly disclosed to their parents or guardians.
7. The College may store personal information in the 'cloud' which may mean it resides on servers which are situated outside of Australia.
8. Saint Spyridon College's Privacy Policy stipulates how parents/caregivers or pupils may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact upon the privacy of another, 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.

9. Saint Spyridon College's Privacy Policy also stipulates how you may complain about a breach of privacy and how the College will handle such a complaint.

10. 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.

11. We may include pupils' and pupils' parents'/caregivers' contact details in a class list and College directory.

12. On occasion, information such as academic and sporting achievements, pupil activities and similar news is published in College newsletters, magazines and on our website. Photographs of pupil activities such as sporting events, school camps and school excursions may be taken for publication in College newsletters, magazines and on our website. The College will obtain separate permission from the pupils' parent or caregiver prior to publication.

13. If you provide the College with the personal information of others, such as doctors or emergency contacts, we encourage you to inform these parties that you are disclosing that information to the College and the reason for doing so, in order that they can access this information if they wish and inform them that the College does not usually disclose the information to third parties.