


Plenty Valley Christian College 	Title: <h1 style="text-align: center;">Privacy Policy</h1>	
	Document Classification: <b>Policy</b>	Version: 2.3 20 March 2018

## Introduction

Plenty Valley Christian College has a Privacy Policy and a series of information collection notices that comply with the Privacy Commissioner's guidelines to non-government Colleges. These documents, in part or whole, are available to the College community upon request.

This Policy is designed to enable careful and reasonable handling of personal information to maintain privacy while effectively carrying out the College's functions and activities. The policy covers all personal information supplied to, stored and used by Plenty Valley Christian College (PVCC), whether of students, parents or guardians, applicants for enrolment, staff or other people.

The Registrar is currently acting in the role of privacy officer on behalf of the College.

## Collecting, storing and using personal information

### 1. What is personal information?

- Privacy refers to the need to protect the personal information that the College collects, stores and uses relating to individual students, parents and guardians, applicants for enrolment, staff, job applicants, volunteers, contractors and other people. It includes personal information on students, parents and guardians held after the period of a student's enrolment at the College. Personal information is information about an individual from which the individual can be identified (or could reasonably be identified). Personal information includes (but is not limited to):
- Sensitive information such as racial or ethnic origins, political opinions or affiliations, religious or philosophical opinions or affiliations, sexual preferences or practices, criminal records, scholarship results, exam marks or teachers' notes
- Health information such as physical or mental health or a disability.

Personal information includes opinions, and may be true or not. It may be recorded in some form or other, or not—that is, it could simply be held in someone's memory. If personal information is recorded, it may be in completed forms, correspondence, emails or other types of documents or records.

### 2. What kinds of personal information will the College collect and hold?

The College will not collect personal information unless it is reasonably necessary for one or more functions or activities of the College. Personal information may include educational and academic records, student behavior and disciplinary records, addresses, dates of birth, phone numbers, health information, physical characteristics, sports information, and information about co-curricular activities.

### 3. 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, or to which you have consented.

### 4. Students and parents

The College primarily collects personal information on students and parents to enable it to provide schooling for the student, including satisfying both the needs of parents and the needs of the student through the period of the student's enrolment. Purposes include:

- Keeping parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- Carrying out day-to-day administration
- Looking after students' educational, social and medical wellbeing
- Seeking donations and marketing for the College
- Satisfying the College's legal obligations and allowing the College to discharge its duty of care.

In some cases, if we don't receive the personal information we ask for, the College may not be able to enrol or continue the enrolment of the student.

#### **5. Job applicants, staff members and contractors**

The College's primary purpose in collecting personal information of job applicants, staff members and contractors is to assess and, if successful, to engage the applicant, staff member or contractor. Purposes include:

- Administering the individual's employment or contract
- Satisfying insurance requirements
- Seeking funds and marketing for the College
- Satisfying the College's legal obligations; for example, meeting child protection legislation.

#### **6. Volunteers**

The College 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.

#### **7. Marketing and fundraising**

Marketing and seeking donations for the future growth and development of the College ensures 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.

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. A person may opt out of receiving marketing and fundraising material at any time by contacting the College.

#### **8. Collecting and using personal information**

##### **a) How we collect personal information**

The College will usually collect personal information via forms filled out by parents or students, through face-to-face meetings and interviews, and via telephone calls. On occasions people other than parents and students provide personal information; for example via a report provided by a medical professional or a reference from another College.

##### **b) Consent**

We will only collect personal information where we have consent, except in cases where we consider collecting personal information is necessary to lessen or prevent a serious threat to life, health or safety, and it is impractical to get consent.

**c) Applications to enroll**

At each stage of the enrolment application process, we will only request personal information necessary to complete that stage of the process, including assessing the suitability of any application against the selection criteria. We will advise parents how the information will be used.

Where applicants are unsuccessful, we will only retain the applicant's information on file if consent is given by the parent or guardian; otherwise, the information will be destroyed.

**d) Using photos**

We will not use photos of students in newsletters, web sites or other publications if we have not been given permission. We will only publish the name of students in newsletters, web sites and on social media, student surnames, will not be published.

**e) Unsolicited personal information**

If we receive unsolicited personal information, we will destroy it unless we are permitted to hold the information and it is needed carry out our functions or fulfil our duty of care to students or staff. If we retain the information, it will be stored in a similar way to all other personal information.

**f) Storing personal information**

We will store personal information securely so that it can only be readily accessed by a staff member with a legitimate reason for using it, and it is protected from interference, misuse, loss or unauthorized access.

Personal information about students, parents or staff that we keep in databases will be protected from general access by effective security arrangements such as passwords so that only those with a legitimate reason can gain access to the information relevant to them. Workstations and software applications such as email will log off after a predetermined period of inactivity to prevent unauthorized access when they are unattended.

Personal information on paper will be kept in locked storage and be protected by any other security measures appropriate to maintaining the required level of confidentiality and privacy. Documents with personal information must not be left visible and unattended in work areas.

**g) When personal information is no longer needed**

When personal information is no longer needed for the purpose for which it was collected, we will destroy it (or de-identify it).

## **Privacy Officer**

The College has appointed a Privacy Officer, who:

- Maintains a register of the College's forms that hold personal information (see the Appendix)
- Arranges for regular training of relevant College staff in handling personal information so that privacy requirements are met
- Audits College administrative practices at least annually to ensure all types and locations of personal information have been identified and the privacy requirements of this policy are being met, and recommend to the Principal modifications or improvements to information handling processes or staff training.

## Transparency and access

### 1. Making our privacy policy available

We will make the policy readily available by posting it on the College website.

### 2. Accessing personal information

We will make available a student's personal information if requested by the student's parent or guardian, if it is reasonable to do so. Requests must be made in writing to the Registrar by completing the Application for Access to Information form Available from the General Office. If we decide not to provide access to the information, the Registrar will give the reasons in writing.

### 3. Who might the College disclose personal information to?

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

- Another School
- Government departments
- Medical practitioners
- People providing services to the College, such as mediation agencies, specialist visiting teachers and sports coaches
- Recipients of College publications, like newsletters and magazines
- Parents
- Anyone you authorise the College to disclose information to.

We will not provide personal information to a third party unless we have consent from the parent or guardian, or we are legally required to do so. For example, we will not supply personal information on a student to a third party who is paying that student's College fees without the consent of the parents or guardians. Legal requirements to provide information may include child protection, law enforcement, court orders and public health or safety issues.

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)
- Otherwise complying with the National Privacy Principles.
- The College will Supply personal information to parents/guardians of FFPOS (Full Fee Paying Overseas Students) outside of Australia.

## Corrections and complaints

### 1. Correcting information

We will make reasonable efforts to keep personal information accurate, up-to-date and complete. Where advised by a student, parent or guardian that the personal information we are holding is incorrect or incomplete, we will correct our records.

### 2. Complaints

Where the College holds personal information on an individual and that person (or their parent or guardian) has a complaint relating to the privacy of the information, the complaint should be made in writing to the Registrar or the Principal. If you make an initial verbal complaint, the College may request you to make the complaint in writing to the Registrar or the Principal so that the specific issues are clearly understood.

In some circumstances, someone making a complaint may wish to maintain anonymity (or pseudonymity). We will respect this desire in handling the complaint.

The Registrar will handle all complaints of breaches of this privacy policy, reporting regularly to the Principal on the progress and outcome of each complaint.

If the College does not respond to a complaint after 30 days, a complaint can be made to the Australian Information Commissioner at <http://www.oaic.gov.au/privacy/privacy-complaints>.

## Legislative requirements

Our privacy policy follows the Australian Privacy Principles found in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth).

## Accountabilities

Role	Accountabilities
Principal	<ul style="list-style-type: none"> <li>• Provide resources so that systems and facilities for holding and using personal information maintain privacy.</li> <li>• Monitor complaints about privacy to ensure satisfactory resolution.</li> </ul>
Registrar	<ul style="list-style-type: none"> <li>• Ensure processes are in place to provide for secure handling of personal information, both in hard copy and computer databases, so privacy of the information is maintained.</li> <li>• Provide for information to be kept up-to-date, corrected where necessary, and destroyed once it is no longer needed.</li> <li>• Receive and respond to requests for access to personal information. Provide written reasons if access is to be refused.</li> <li>• Receive and resolve any complaints about privacy.</li> <li>• Maintain the register of the College's forms that hold personal information.</li> <li>• Arrange for training of relevant College staff in handling personal information.</li> <li>• Audit the College's administrative practices at least annually to ensure the privacy requirements are being met.</li> <li>• Recommend to the Principal modifications or improvements to information handling processes or staff training.</li> </ul>
Staff	<ul style="list-style-type: none"> <li>• Never access and use personal information unless it is required to do your work.</li> <li>• Maintain the privacy of personal information, including information you know even though it isn't written down.</li> </ul>

## Definitions

Term	Definition
Personal information	<p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> <li>• whether the information or opinion is true or not; and</li> <li>• whether the information or opinion is recorded in a material form or not.</li> </ul>

## **References**

### **Legislative and other external references**

- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (includes Australian Privacy Principles in Schedule 1)

## DOCUMENT HISTORY & VERSION CONTROL RECORD

Name of Document: **Privacy Policy**  
Responsible Officer: Registrar  
Approved by: Principal  
Date of approval: 17/07/06  
Assigned review period: Biennial  
Date of next review: March 2020

Version Number	Version Date	Responsible Officer	Amendment Details
1.0	11/04/2002	Privacy Officer	Board approved policy
1.1	17/07/2006	Privacy Officer	Initial issue as a controlled document
1.2	13/12/2011	OH&S Admin	Phone number changes
1.3	08/10/2013	Privacy Officer	Minor changes and dates
2.0	28/04/2014	Registrar	Policy reviewed to incorporate new Privacy Laws
2.1	02/06/2014	Principal	Minor Changes
2.2	07/09/2017	S Taggart	Changed to Biennial as discussed in OHS Meeting 07/09/2017.
2.3	20/3/2018	Principal	Updated changes to the use of students surnames

Approved By:



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John Metcalfe  
Principal