

FAIRBRIDGE COLLEGE

Privacy Policy

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Supporting Documents (internal)	Disputes and Complaints Policy
Supporting Documents (external)	
Forms	
Legislative Requirements	Australian Privacy Principles Commonwealth Privacy Act
Work Instructions	
Other References that may be applicable to this Policy	

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1 INTRODUCTION

Fairbridge College is bound by the *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 Colleges' operations and practices and to make sure it remains appropriate to the changing College environment.

2 COLLECTION OF PERSONAL INFORMATION

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

- students and parents and/or carers ('carers') 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.

2.1 PERSONAL INFORMATION YOU PROVIDE

The College will generally collect personal information held about an individual by way of forms filled out by carers or students, face-to-face meetings and interviews, and telephone calls.

2.2 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.

2.3 PHOTOGRAPHS

The College will, as part of its activities, take photographs of College activities, staff, students and other personnel for internal use and promotional activities.

2.4 EXCEPTION IN RELATION TO EMPLOYEE RECORDS

Under the *Privacy Act* the *Australian Privacy Principles* do not apply to an employee record. As a result, this 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 employee.

3 USE OF PERSONAL INFORMATION

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 a person has consented.

3.1 STUDENTS AND CARERS

In relation to personal information of students and carers, 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 carers 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 students and Carers include:

- to keep carers informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after students' educational, social, spiritual and medical wellbeing;
- 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 student or Carer, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the student.

3.1.1 PHOTOGRAPHS

Images of the College's students, staff, alumni and visitors are used in many instances via the College's newsletters, website and other public relations materials, for both internal and external promotion of the College and its activities.

Explicit permission from carers to use photographs is at enrolment. It should be noted that students' full names will not be used in conjunction with a photograph in any publication that will be freely available beyond the College community.

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

3.3 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.

3.2 MARKETING AND FUNDRAISING

The College regards 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 vital 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.

Carers, 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.

4 DISCLOSURE OF PERSONAL INFORMATION

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

- another College;
- 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;
- Carers;
- anyone to whom we are required to disclose information by law; and,
- anyone you authorise the College to disclose information to.

5 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 you agree otherwise, or the use or disclosure of the sensitive information is required by law.

6 MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

The Colleges' staff are required to respect the confidentiality of students' and carers' personal information and the privacy of individuals.

The College has in place steps to protect the personal information the College holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including:

- locked storage of paper records and access restricted to those who directly use the data stored there;
- regulated levels of access to databases and files or staff according to the needs of their role;

- security for College buildings;
- completing due diligence with regard to third party service providers, including cloud service providers, to ensure as far as practicable where they have access to personal information collected and stored by the College, their own practices are compliant with the APP or equivalent privacy protocols.

When personal information we have collected is no longer required, it is destroyed, deleted or de-identified as appropriate.

7 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 held by the College by contacting the office at any time.

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

8 CHECKING PERSONAL INFORMATION HELD BY THE COLLEGE

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. There are some exceptions to this right set out in the Act. 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, please contact the College's 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.

9 CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

The College respects every Carer'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 carers. The College will treat consent given by Carers as consent given on behalf of the student, and notice to carers will act as notice given to the student.

Carers 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 student.

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 Carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

10 DISPUTES AND COMPLAINTS

If you would like further information about the way the College manages the personal information it holds, or wish to lodge a complaint about a perceived breach of the *Australian Privacy Principles* by the College, please contact the Principal. In accordance with the College's *Disputes and Complaints Policy*, you must provide the Principal with the details of your complaint in writing.