



# PRIVACY POLICY

## **Your privacy is important**

This statement outlines Overnewton Anglican Community College's (College) policy on how it collects, uses, discloses and manages personal information provided to or collected by it.

The College is bound by the Australian Privacy Principles (AAPs) in the *Privacy Act 1998* (Cth) (Act). The College has adopted internal policies and procedures to ensure that personal information that we collect, store, use and disclose is managed in accordance with the APPs.

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.

## **What kind of personal information does the College collect?**

The College may need to collect personal information about you or others including names, addresses, phone numbers and other contact details. The College may need to collect personal information so that it can identify:

- students and parents and/or guardians of students 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.

## **How does the College collect personal information?**

Unless it is unreasonable or impractical, we will collect personal information directly from the individual concerned or their parent or guardian (particularly in the case of students) by way of completed forms and questionnaires, face-to-face meetings, interviews, telephone calls, video conferences and otherwise during the course of dealing with the individual concerned. On occasions, people other than parents and students may provide information (eg. a report provided by a medical professional or reference from another school). However, where we are at liberty to do so, we will use our best endeavours to seek an individual's consent (or parental or guardian consent) before obtaining their personal information from third parties.

## **Collecting sensitive information**

We may need to collect sensitive information about you or others including information relating to racial or ethnic origin, religious beliefs or affiliations, criminal record or health, genetic or biometric information.

Under the APPs, we are entitled to collect sensitive information about you or others for a number of reasons, including where the College reasonably believes the collection is necessary to lessen or prevent serious threat to the life, health or safety of any individual or the public.



Where we are required to, and it is practicable to do so, we will seek your consent before collecting your sensitive information and inform you of the purpose of the collection at that time. Your consent to collection of your sensitive information may be implied in limited circumstances.

### **Consequences of not collecting personal information**

If we are not provided with all the personal information we request, we may be unable to enrol, or continue to enrol, a student or provide education or other products or services to you or your child.

***Exception in relation to employee records:*** Under the Act, the APPs do not apply to a private sector 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 employee.

### **Anonymity and Pseudonymity**

You have the option of not identifying yourself or of using a pseudonym when dealing with the College in relation to a matter. However, if you do not provide your personal information to the College it may be impractical or impossible to provide education or other products or services to you or your child.

### **How will the College use the personal information you provide?**

The College will use personal information it collects from you or others for the particular purpose for which it was collected, and for such other permitted secondary purposes, including where you have consented to the use of your personal information or you have a reasonable expectation that the information will be used of a particular purpose.

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

The secondary purposes for which the College uses personal information of students and parents include:

- to keep parents informed about matters relating to their child's education, through correspondence, newsletters and magazines;
- to facilitate day-to-day administration;
- to look after students' educational, social and medical wellbeing;
- to seek donations and market the College;
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

***Job applications, 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 secondary purposes for which the College uses personal information of job applicants, staff members and contractors include:

- to administer the individual's employment or contract, as the case may be;
- for insurance purposes;
- to seek funds and market the College;
- 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 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 receive fundraising information. College publications, like *Whispers* and the annual College magazine *Omnia*, which include photographs and personal information, may be used for marketing purposes. Such publications, or extracts from them, may be posted on the College internet site. If you do not want your personal information included in College publications or you would prefer not to receive information about our marketing and fundraising activities, you can contact our Privacy Officer and request removal of your information from our publications and/or circulation list. Contact details for our Privacy Officer appear at the end of this policy.

### **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, including visiting specialist teachers and sports coaches;
- recipients of College publications such as *Whispers*, and the College magazine *Omnia*, including via the College website: [www.overnewton.vic.edu.au](http://www.overnewton.vic.edu.au);
- parents; and
- anyone you authorise the College to provide information to.

The College will only disclose sensitive information to third parties for a purpose for which the information was provided (Primary Purpose) or a secondary purpose that is directly related to the Primary Purpose or as otherwise instructed by you.



## **Sending information overseas**

The College will not send personal information about an individual outside Australia without taking reasonable steps to ensure that an overseas recipient does not breach the APPs in relation to disclose personal information unless the College:

- reasonably believes that the recipient of the information is subject to legal obligations that uphold principles for the protection and fair handling of personal information that are substantially the same as the APPs;
- obtains the consent of the individual (in some cases consent will be implied) to the disclosure after the individual is informed that the Act will not apply in relation to the management of personal information by the overseas recipient and the individual may not be able to seek redress under the Act; or
- is legally authorised or required to do so.

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

The College usually stores the personal information that it collects on a hard copy file concerning the individual and on its computer database.

The College is committed to maintaining adequate safeguards to protect the personal information the College holds from misuse, loss, unauthorised access, interference, modification, destruction, disclosure or accidental loss by use of various methods including locked storage of paper records and pass worded access rights to computerised records.

The College's staff are required to adhere to internal policies regarding the management of personal information and to read this policy and understand their responsibilities in respect of personal information.

We will destroy or de-identify any personal information that we hold which is no longer required for any purpose permitted by the APPs, unless the College is required by law to retain such personal information.

## **Updating personal information**

The College asks that you tell us of any changes to the personal information it holds about you to ensure it is accurate, complete and up-to-date. A person may seek to update their personal information held by the College by contacting the College's Privacy Officer (whose contact details are listed at the end of this policy). If we consider that the personal information we retain does not require amendment, we will annotate the request on our files.



## **You have the right to check what personal information the College holds about you**

Under the Act, an individual generally 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 personal information through their parents, but older students may seek access themselves. To make a request to access any information the College holds about you, please contact the College's Privacy Officer in writing.

The College may require you to verify your identity and specify what information you require. The College may charge a reasonable fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. The College will provide an estimate of any charge on request or if it appears that the work will be onerous or the information sought is extensive.

## **Consent and restrictions on 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's Privacy Officer. However, there will be occasions when access will be denied. Such occasions include where the request for, or release of, the information:

- would have an unreasonable impact on the privacy of others;
- would pose a serious threat to the life, health or safety of any individual or to public health or public safety;
- is frivolous or vexatious; or
- 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 parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

## **Complaint resolution**

If you consider that the College has failed to deal with your personal information in accordance with the APPs or this policy, please speak to us so that we have an opportunity to resolve the issue to your satisfaction. The person to contact is the College's Privacy Officer who will:

- listen to your concerns and grievances regarding the handling of your personal information;
- discuss with you the ways in which we can remedy the situation; and
- put in place an action plan to resolve your complaint and improve our information handling procedures (if appropriate).



## Contact information

If you wish to access any personal information that we hold about you, or you would like further information about the way the College manages the personal information it holds, please contact the Privacy Officer:

Privacy Officer  
Overnewton Anglican Community College – Keilor Campus  
2-30 Overnewton Road  
KEILOR VIC 3036  
Telephone: + 61 3 9334 0000  
Facsimile: + 61 3 9336 1835  
Email: [privacy.officer@overnewton.vic.edu.au](mailto:privacy.officer@overnewton.vic.edu.au)