



PRIVACY POLICY

Your privacy is important

This document 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 (**APPs**) in the *Privacy Act 1998* (Cth) (**Act**) and 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 and the 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.

Please refer to our website for the latest version of this Privacy Policy.

Collection

What kind of personal information does the College collect?

The College may collect personal information about you or others (such as minors under your care), including contact details such as names, next of kin, addresses and phone numbers; identification documents and information, including residency status and date of birth; and other general person information, including images (e.g., photographs and videos), academic results and performance, and health or other sensitive information.

The College may collect this 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.

We may also collect personal information which is:

- 'sensitive information', including information relating to nationality, racial or ethnic origin, religious beliefs or affiliations, criminal record, or health (see below), genetic or biometric information; and
- 'health information' (particularly for students, parents, guardians, employees and other visitors to the College premises), including medical records, disabilities, allergies, immunisation details and psychological or counselling records.

Under the APPs, we are entitled to collect sensitive information about you or others for a number of reasons, including:

- for the purposes of the College's functions and activities, which include providing education and community services;
- where the individual, or their parent or guardian, has consented;



- where collection is required or authorised by law, which includes the common law duty of care; and
- 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.

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 by way of completed forms and questionnaires, face-to-face meetings, interviews, telephone calls, video conferences, through online tools such as our website, CCTV cameras located at the College premises, and otherwise during the course of dealing with the individual concerned or their parent or guardian.

On occasions, people other than parents, guardians and students may provide information to the College (e.g., a report provided by a medical professional or reference from another school). However, where the circumstances permit, 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.

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.

Unsolicited Information

In some instances, the College may be provided with or otherwise receive personal information without having sought it through the above means of collection (**Unsolicited Information**). This may include receipt by:

- misdirected correspondence, including by postal, personal delivery or electronically; and
- employment, contracting or volunteer applications which do not relate to an advertised vacancy.

Where the College receives Unsolicited Information, it will determine whether the personal information could have been collected by soliciting it from the individual (as above). Where the College concludes that the Unsolicited Information is not of a nature which would ordinarily be requested or collected by the College, it will, where lawful and reasonable to do so, destroy the Unsolicited Information or ensure it is otherwise de-identified. If the College decides to retain the



Unsolicited Information, it will deal with this personal information in accordance with this Privacy Policy.

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.

Use and Disclosure

How will the College use the personal information you provide?

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

Sensitive information will be used or disclosed only for the primary purpose for which it was collected, and for such other secondary purposes that are directly related to the primary purpose of collection and that you reasonable expect us to use it for, or to which you have consented.

The College may also use personal and sensitive information for a secondary purpose where:

- the use of disclosure is required or authorised by or under an Australian law or a court/tribunal order;
- a permitted health situation exists; or
- the College reasonably believes the use or disclosure is reasonably necessary for an enforcement body to conduct enforcement related activities.

Students and parents/guardians: In relation to personal information of students and parents/guardians, the College's primary purpose of collection is to enable the College to provide education services to the student, exercise its duty of care, and perform necessary associated administrative or community activities which will enable students and parents/guardians to take part in all activities of the College. This includes satisfying the needs of the parents and guardians, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

The secondary purposes for which the College may use personal information of students, parents/guardians include:

- to keep parents/guardians 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; and



- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

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 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; 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 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, guardians, 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 for educational, community, administrative and support purposes to:

- another school;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the College, including visiting specialist teachers, activity provider and sports coaches;
- providers of learning and assessment tools;
- assessment and education authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);



- people and organisations providing administrative, technology and financial services to the College;
- recipients of College publications such as Whispers, and the College magazine Omnia, including via the College website: www.overnewton.vic.edu.au;
- parents/guardians;
- anyone you authorise the College to provide information to; and
- anyone to whom we are required or authorised to disclose the information by law, including child protection laws.

Sending and storing information overseas

The College may disclose personal information about an individual to overseas recipients, for example, to facilitate an overseas school trip. However, the College will not send personal information about an individual outside Australia unless it:

- obtains the consent of the individual, their parent or guardian (in some cases this consent will be implied);
- is legally authorised or required to do so; or
- otherwise complies with the APPs or other applicable privacy legislation.

The College may also use other online or ‘cloud’ storage providers to store personal information and to provide online services to the College that involve the use of personal information, such as services relating to email, instant messages and education and assessment applications.

Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the ‘cloud’ which means that it made reside on a cloud service provider’s servers which may be situated outside Australia.

Management of Information

Management and security of personal information

The College will take reasonable steps 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 respect the confidentiality of personal information and the privacy of individuals.

If there is unauthorised access to, disclosure of, or loss of personal information where unauthorised access or disclosure is likely to occur, the College is required to notify the individuals to whom the information relates that such a breach has occurred. This requirement is limited to circumstances where the College determines that a reasonable person would conclude that access to or disclosure of personal information would likely result in serious harm to any individuals to whom the information



relates. Where it is not practicable to notify each individual to whom the information relates, the College may publish a statement on its website detailing the breach or likely breach, including any recommended steps that the relevant individuals should take.

Where personal information is no longer required for an authorised purpose, the College will take reasonable steps to destroy or permanently de-identify the personal information.

Access and updating of personal information

Under the Act, an individual generally has the right to seek and 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, including access to employee records. Students will generally be able to access to personal information through their parents or guardians, but older students may seek access themselves.

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. If we consider that the personal information we retain does not require amendment, we will annotate the request on our files.

To make a request to access any information or update any personal 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. If the College cannot provide you with access to that information, you will in most cases be provided with written notice explaining the reasons for refusal.

Parents or guardians can log in to the Parent Portal and correct or update some of their or their child's personal information at any time.

Consent and restrictions on rights of access to the personal information of students

The College respects every parent or guardian'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 or guardians. The College will treat consent given by parents or guardians as consent given on behalf of the student and notice to parents or guardians will act as notice given to the student.

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

Complaint resolution

If you have an issue or complaint about the way the College manages personal information, 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 handing 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 – Yirramboi Campus

2-50 Overnewton Road

KEILOR VIC 3036

Telephone: + 61 3 9334 0000

Facsimile: + 61 3 9336 1835

Email: privacy.officer@overnewton.vic.edu.au