



PRINCE ALFRED COLLEGE

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Prepared by:	Director Corporate Services
Approved by:	The College Council
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This Privacy Policy sets out how Prince Alfred College (**the College**) manages personal information provided to or collected by it.

The College is bound by the Australian Privacy Principles contained in the Commonwealth *Privacy Act 1988 (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 College's operations and practices and to make sure it remains appropriate to the changing college environment.

Scope

This policy outlines the circumstances in which personal information, and sensitive information, are obtained, how that information is used and how requests to access and/or change that information is managed. This policy applies to all staff, volunteers and contractors of the College and its related bodies.

Definitions

What is personal information?

Personal information is any information or opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

What is sensitive information?

Sensitive information is a subset of personal information that includes information or an opinion about an individual's:

- racial or ethnic origin; or
- political opinions; or
- membership of a political association; or
- religious beliefs or affiliations; or
- philosophical beliefs; or
- membership of a professional or trade association; or

- membership of a trade union; or
- sexual preferences or practices; or
- criminal record; or
- health information about an individual; or
- genetic information about an individual that is not otherwise health information.
- Biometric information (ie face biometric identifiers (encrypted) for the sole purpose of photo consent application),

Subject to some exceptions permitted by law, the College will obtain consent before collecting, using, or disclosing sensitive information about an individual.

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

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

- students (including former students) and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the College; and
- job applicants, staff members, volunteers and contractors.

Personal Information you provide: The College will generally collect personal information held about an individual by way of documents or forms filled out by Parents, students or other individuals, face-to-face meetings and interviews, emails, letters and other forms of correspondence, websites, telephone calls and through financial transactions. Personal information collected by the College also includes contact details that are provided by parents, students and former students when they update their records, register for an event or subscribe to a service.

From time to time, the College will also collect sensitive information about you. Such sensitive information will generally comprise biometric information about you, including facial biometric identifiers about you.

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 employer or a referee for prospective employees.

Unsolicited information: The College may be provided with personal information without having sought it through normal means of collection, such as a result of misdirected post or emails, employment applications received that are not in response to an advertised vacancy or additional information provided which was not requested.

Unsolicited information obtained by the College will only be held, used and or disclosed if it is considered as personal information that could have been collected by normal means. Otherwise, such information will be destroyed, permanently deleted or de-identified to the extent lawfully and reasonably appropriate.

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 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.

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.

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 schooling to students enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College. This includes satisfying the needs of Parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

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

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of the College;
- administering, processing and/or managing student application(s) and achievement(s) for awards, competitions, scholarship (whether such award or scholarship is provided by the College or any third party) and/or financial assistance, grants or bursaries, and if successful, administering and/or managing the student awards, scholarships and/or financial assistance, grants or bursaries;
- looking after students' educational, social and medical wellbeing;
- Enhancing our daily operations in College digital media management by providing greater transparency and control over College, while enabling the automatic, real-time application of parental or guardian photo consent to protect students
- informing the College's Community of student academic, sport and co-curricular achievements;
- seeking donations and other fundraising activities 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 Parent and that information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

The College uses sensitive information (in the form of facial biometric identifier data) for the sole purpose of its management of digital media, including by managing and automatically applying consent from parents and guardians of students to the use of photographs taken of students in real-time.

Job applicants and contractors: In relation to personal information of job applicants and

contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be.

The purposes for which the College uses personal information of job applicants and contractors include:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and other fundraising activities, and marketing for the College; and
- satisfying 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, such as the Prince Alfred Old Collegians' Association events and functions, to enable the College and the volunteers to work together.

Marketing and fundraising: The College treats marketing and seeking donations and conducting other fundraising activities 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 students and staff thrive.

The College collects personal information from Parents and students for this purpose, where such information is retained following the graduation of students to provide services to you as a member of the College's Old Scholars community. Following graduation, the College will collect personal information directly from its former students for this purpose. It may also collect personal information of former students from other sources, but only with their consent, or where otherwise required or authorised by law.

Personal information held by the College may be disclosed to organisations that assist in the College's marketing and fundraising, for example, the Prince Alfred Old Collegians' Association or, on occasions, external marketing and fundraising organisations.

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.

Sensitive information: Sensitive information will be used and disclosed only for the purpose for which it was provided (as described in this policy) or a directly related secondary purpose, save for the following exceptions: (1) you agree to the information being used for a different purpose; or (2) the use or disclosure of the sensitive information is required or permitted by law.

Who might the College disclose personal information to and store your information with?

The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other colleges and teachers at those colleges;
- government departments;
- medical practitioners;
- people providing educational, support and health services to the College,

including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools;

- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority;
- people providing administrative, marketing, fundraising and financial services to the College;
- recipients of College publications, such as newsletters and magazines;
- students' Parents;
- anyone you authorise the College to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.
- contracted service providers such as pixevety for the primary purpose of school media management and photo consent administration

Sending and storing information overseas: The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a college 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);
- being reasonably satisfied that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging 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 may reside on a cloud service provider's server which may be situated outside Australia.

Management and security of personal information

The College's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

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

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.

Updating, access and correction of personal information

The College endeavours to ensure that the personal information it holds is accurate, complete and up to date. Parents and students are asked to inform the College of any changes to their personal information (including student health information). Under the Privacy Act, an individual 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. Students will generally be able to access and update their personal information through their

Parents, but older students may seek access and correction themselves.

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

To make a request to access or to update any personal information the College holds about you or your child, please contact the College's Privacy Officer by telephone on +61 83341200 or in writing (marked to the attention of the Privacy Officer): email: privacy@pac.edu.au.

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 cannot 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 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.

However, around the time of graduation of a student from the College, the College may seek the consent of a student in relation to their personal information directly so that the College may maintain contact with that student, including for the purposes referred to in this policy.

Parents may seek access to personal information held by the College about them or their child by contacting the Privacy Officer by telephone or in writing.

However, there may 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 and 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 warrant it.

Enquiries and complaints

If you have any concerns or would like further information about the way the College manages the personal information it holds, or wish to make any complaint or enquiry about the College's compliance with the Australian Privacy Principles, please contact the College's Privacy Officer.

The College will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is reasonably practicable after it has been made. In order to properly investigate the complaint, the College may seek further information from you.

If you are not satisfied with the decision of the College you may refer the complaint to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, www.oaic.gov.au.

How to contact us

The College can be contacted about this Privacy Policy or about personal information generally, by:

- Emailing the Privacy Officer at privacy@pac.edu.au marked to the attention of the Privacy Officer);
- Calling the Privacy Officer on +61 83341200;
- Writing to the Privacy Officer, Prince Alfred College P O Box 571 Kent Town SA 5071 (marked to the attention of the Privacy Officer).