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PRIVACY POLICY

*Policy approved by Council in March 2014
Compiled by K Watson (Compliance Manager)
Policy due for review and re-approval by March 2017*

1 RATIONALE

YOUR PRIVACY IS IMPORTANT

- 1.1 This privacy policy outlines how Prince Alfred College (the “College”) collects, uses and discloses personal information as required by the Australian Privacy Principles (the “APPs”) and the credit provider provisions contained in the *Privacy Act 1988* (Cth) (the “Privacy Act”).
- 1.2 This privacy policy is available on our website (<http://pac.edu.au/>). A person may also request that the College provides them with a copy of this privacy policy in a different form using the contact details set out below and the College will take such steps as are reasonable in the circumstances to do so free of charge.

DEFINITIONS

“Personal information” means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether that information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

“Sensitive information” 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.

2 AIM

- 2.1 The College is committed to providing the highest level of privacy in handling the information provided to the College.

3 POLICY STATEMENT

- 3.1 The type of information the College collects and holds includes (but is not limited to) personal information, including sensitive information, about:
 - students and parents and/or guardians (hereafter referred to as “parents”) 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.
- 3.2 The kinds of information the College collects and holds may include: names and contact details; identification information or records; current and previous employment information; credit card details; Australian Curriculum and Reporting Authority (ACARA) data; academic results; credit information and other information reasonably necessary for or directly related to one more of the functions or activities of the College
- 3.3 The kinds of sensitive information the College collects and holds may include: details relating to individuals' health and medical history, race, ethnic origin, religion and nationality; and in respect of certain volunteers, job applicants, employees and contractors only, details of any criminal record.
- 3.4 Personal information is collected in the following ways:
- Personal information provided by individuals: The College will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, and telephone calls. On occasions people other than parents and students provide personal information.
 - Personal information provided by other people: In some circumstances the College may collect information about:
 - an individual from a third party, for example a report provided by a medical professional or a reference from another school;
 - parents from students and vice versa; and
 - employees, prospective employees, contractors or volunteers, from police agencies, agencies who complete police checks on the College's behalf, previous employers, referees and other third parties as and when reasonably necessary.
- 3.5 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 consent has been given.
- 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 for the student. This includes satisfying both the needs of parents 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 parents include:
 - to provide schooling and educational services to students and to look after students' educational, social, spiritual and medical well-being;
 - to provide students with a safe learning environment;
 - to keep parents informed about matters related to their child's schooling, through reports, correspondence, newsletters and magazines;
 - to assist with pre-enrolment matters, school transfers and day-to-day administration;
 - seeking donations and marketing for the College;
 - to allow the College to fulfil its duty of care and to satisfy its legal obligations, for example, in relation to child protection legislation (*Children's Protection Act 1993 (SA)*)

In some cases where the College requests personal information about a student or parent, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the student

- 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 donations and marketing for 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 and groups who assist the College in its functions or conduct associated activities, such as the Parents & Friends Association and the Prince Alfred Old Collegians Association for the primary purpose of enabling such volunteers and groups to work together and to keep them informed about matters concerning them.
 - **Marketing and fundraising:** Marketing and seeking donations for the future growth and development of the College is an important part of ensuring 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 (e.g. newsletters and magazines) which include personal information may be used for marketing purposes. Such persons have the right to notify the College at any time if they would not like to receive such marketing and fundraising information using the contact details set out below.

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

- other schools (e.g. to facilitate school transfers);
- government departments, police agencies; and agencies who complete police checks such as CrimTrac;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers and sports coaches;
- recipients of College publications (e.g. newsletters and magazines);
- the Association of Independent Schools (AIS);
- financial consultants, accountants, lawyers and advisers of the College and any of the College's associates, related entities or contractors;
- any industry body, tribunal, court or otherwise in connection with any privacy complaint made by an individual about the College;
- anyone the individual (or parents of the student) authorises the College to disclose information to.

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); or
- otherwise complying with the APPs.

3.7 **Sensitive information.**

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless agreed otherwise, or the use or disclosure of the sensitive information is allowed by law.

- 3.8 **Credit information.** The Privacy Act classifies certain personal information relating to goods/services supplied on terms which allow payment to be deferred for a period of more than 7 days (i.e. “credit” terms) as credit information.

The College may collect and hold credit information in relation to parents/guardians including: identification information; consumer credit liability information (e.g. details of amounts payable to the College and the terms on which they are payable), information relating to payments made (and whether they are made when due), default information and payment information.

The College will not disclose credit information without the relevant individual’s consent unless permitted by law or unless reasonably necessary in connection with a privacy complaint made by an individual about the College.

- 3.9 **Management and security of personal information.** The College has in place steps to protect the personal information the College holds from misuse, loss, unauthorised access, modification or disclosure. In particular:

- paper records are kept in locked storage.
- Access to computerised records is available only by password.

Access, by key or password, is limited to those who need to know the information contained for the primary purpose of the information.

- 3.10 **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.
- Parents may seek access to personal information held by the College about them or their child using the contact details set out below. 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 parents. This would normally be done only when the relevant student has reached 18 years of age or if the maturity of the student and/or the student's personal circumstances so warrants.

- 3.11 **Updating personal information.** The College endeavours to ensure that the personal information it holds is relevant, accurate, complete and up-to-date.

- Parents will receive regular reminders through the College newsletter to check and update information held by the College about their son.
- A person may seek to update their personal information held by the College by contacting the College at any time using the contact details set out below. Parents can update information through the online forms available via the College website.
- 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 Privacy Act. Students will generally have access to their personal information through their parents, but older students may seek access themselves.

- A request to access any information the College holds about an individual must be made in writing using the contact details set out below specifying the information being sought. The College may require verification of the identity of the applicant. The College may charge a fee to cover the cost of verifying an 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.

3.12 **Complaints.** Complaints about the College's compliance with the APPs, the Privacy Act or any related privacy code can be made using the contact details set out below. Once such a complaint is received, the College will take such action as is reasonably necessary in order to remedy any actual breach that has occurred as soon as reasonably practicable.

Complaints may also be made directly to the Office of the Australian Information Commissioner by visiting this website and following the steps:

<http://www.oaic.gov.au/privacy/privacy-complaints..>

3.13 **Anonymity and pseudonyms.** An individual has the option of not identifying themselves or using a pseudonym when dealing with the College in relation to privacy matters unless: we are required by law or a court/tribunal to deal with individuals who have identified themselves; or it is impractical for us to deal with an individual who has not identified themselves in the circumstances..

3.14 **Exclusions.** Under the Privacy Act the APPs 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.

4 IMPLEMENTATION

4.1 CONTACT US

If an individual would like further information about the way the College manages the personal information they may contact the College during business hours using the following contact details: Prince Alfred College, ATTN: Compliance Manager, **Dequetteville Terrace, Kent Town, S.A. 5067, Phone: +61 8 334 1200, E-mail: reception@pac.edu.au**

4.2 The Privacy Officer for the College will be the Compliance Manager.

4.3 All College staff members are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

4.4 All College staff members are required to follow all designated procedures to protect personal information stored by the College.

5 PROCESS/TIMESCALE REVIEW

The College may, from time to time, review and update this privacy policy to take account of new laws and technology, changes to College operations and practices and to make sure it remains appropriate to the changing College environment. This policy will be reviewed every three years.

6 RELEVANT GUIDELINES

GUIDELINES

PP G1 Privacy statement