



BROUGHTON
ANGLICAN COLLEGE

PRIVACY POLICY

VERSION	1
WRITTEN	November 2019
REVIEW DATE	June 2020

Table of Contents

1. Introduction	3
2. What Kinds of Personal Information does the College Collect and How Does the College Collect It?.....	3
2.1 Personal Information You Provide	4
2.2 Personal Information Provided by Other People:.....	4
2.3 Exception in Relation to Employee Records:.....	4
3. How will the College Use the Personal Information you Provide?	4
3.1 Students and Parents / Carers	5
3.2 Job Applicants and Contractors	5
3.3 Volunteers	6
3.4 Marketing and Fundraising.....	6
4. Who Might the College Disclose Personal Information To and Store your Information With?.....	6
4.1 Sending and Storing Information Overseas	7
5. How does the College Treat Sensitive Information?	7
6. Management and Security of Personal Information.....	7
7. Access and Correction of Personal Information.....	8
8. Consent and Rights of Access to the Personal Information of Pupils.....	8
9. Enquiries and Complaints.....	9

1. Introduction

This Privacy Policy sets out how 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*. In relation to health records, the College is also bound by the New South Wales Health Privacy Principles which are contained in the *Health Records and Information Privacy Act 2002* (Health Records 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.

2. 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, parents and / or guardians ('Parents') and carers before, during and after the course of a student's enrolment at the College including:
 - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
 - parents' / carers' education, occupation and language background
 - medical information (e.g. details of disability, and / or allergies, absence notes, medical reports and names of doctors)
 - conduct and complaint records, or other behaviour notes, and school reports
 - information about referrals to government welfare agencies
 - counselling reports
 - health fund details and Medicare number
 - any court orders
 - volunteering information
 - photos and videos at College events
- job applicants, staff members, volunteers and contractors, including:
 - name, contact details (including next of kin), date of birth, and religion
 - information on job application
 - professional development history
 - salary and payment information, including superannuation details

- medical information (e.g. details of disability and /or allergies, and medical certificates)
 - complaint records and investigation reports
 - leave details
 - photos and videos at College events
 - workplace surveillance information
 - work emails and private emails (when using work email address) and Internet browsing history
- other people who come into contact with the College, including name and contact details and any other information necessary for the particular 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 parents / carers or students, face-to-face meetings and interviews, emails and telephone calls. On occasions, people other than parents / carers and students provide personal information.

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 school.

2.3 Exception in Relation to Employee Records:

Under the Privacy Act and Health Records Act, the Australian Privacy Principles and Health 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.

3. 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.

3.1 Students and Parents / Carers

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

- to keep parents / carers informed about matters related to their child's / children's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of the College;
- looking after students' educational, social 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 parent / carers, if the 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.

3.2 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:

- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the College; and
- satisfying 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, including the College Parent Committee and the Alumni Committee to enable the College and the volunteers to work together.

3.4 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 provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the College Parent Committee.

Parents / carers, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and the yearbook, which include personal information, may be used for marketing purposes.

4. 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 schools and teachers at those schools
- government departments (including for policy and funding purposes)
- medical practitioners
- people providing educational, support and health services to the College, including specialist visiting teachers, sports coaches, volunteers and counsellors
- providers of assessment and learning tools
- assessment and educational 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 providing administrative and financial services to the College
- recipients of College publications, such as newsletters and the yearbook
- students' parents / carers
- anyone you authorise the College to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

4.1 Sending and Storing Information Overseas

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or tour. 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); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The College utilises online or 'cloud' services such as Office365 and EnrolHQ. These cloud services provide services to the College that may involve the storing and 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 reside on a 'cloud' service provider's servers which may be situated outside Australia. Full privacy including disclosure statements can be found on their websites.

5. How does the College Treat 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, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric 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 allowed by law.

6. Management and Security of Personal Information

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

The College has in place steps to protect the personal information the 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.

7. Access and Correction of Personal Information

Under the Commonwealth Privacy Act and the Health Records 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. There are some exceptions to this right set out in the Act.

Students will generally be able to access and update their personal information through their parents / carers, 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 / children, please contact the College's Student Services Centre at ssc@broughton.nsw.edu.au 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.

If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

8. Consent and Rights of Access to the Personal Information of Pupils

The College respects every parent's / carer's right to make decisions concerning their child's / children'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 / carers. The College will treat consent given by parents / carers as consent given on behalf of the student, and notice to parents / carers will act as notice given to the student.

Parents / carers may seek access to personal information held by the College about them or their child / children by contacting the College's Student Services Centre at ssc@broughton.nsw.edu.au 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, 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 / carers. This would normally be done only when the maturity of the student and / or the student's personal circumstances warrant it.

9. Enquiries and Complaints

If you would like further information about the way the College manages the personal information it holds, or wish to complain that you believe that the College has breached the Australian Privacy Principles please contact the College's Student Services Centre at ssc@broughton.nsw.edu.au in writing.

The College will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.