



Privacy Policy

Rationale

This Privacy Policy sets out how Red Rock Christian 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 Victorian legislation Health Records Act, and Health Privacy Principles which are contained in the Health Records Act 2001 (Vic).

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.

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 and parents and/or guardians (hereafter known as parents) before, during and after the course of a student's enrolment at the College
- Job applicants, staff members, volunteers and contractors
- 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.

Personal Information you provide: 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, emails and telephone calls. From 2018, the College is transitioning to electronic collection of personal information, initially through the proprietary application CareMonkey. This in part is to increase information security by reducing the risk of misplaced paperwork.

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 College.

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. The College handles staff health records in accordance with the Health Privacy Principles in the Health Records Act.

How will the College use the personal information you provide?



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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 education 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:

- keeping parents informed about matters related to their child's education, 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, 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.

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;
- 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.

Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, enabling 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



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College continues to provide 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. Personal information for direct marketing will not be passed on to third parties. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes related directly to the College. Publications beyond the immediate school community will only use the student's first name and year level.

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:

- another school;
- 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, counsellors;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities
- people providing administrative and financial services to the College;
- recipients of College publications, such as newsletters and magazines;
- Students' parents or guardians;
- 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.

Nationally Consistent Collection of Data (NCCD) on School students with a disability The School is required by the Federal Australian Education Regulation 2013 (the Regulation) to provide certain information under the NCCD on students with a disability. The School provides the required information to Independent Schools Victoria (ISV), as an approved authority, to provide on the school's behalf. Under the NCCD, the following information is required for each student with a disability:

- Their level of education (ie. primary or secondary)
 - Their category or disability (ie physical, cognitive, sensory or social/emotional)
 - Their level of adjustment (ie support provided within quality differentiated teaching practice, supplementary, substantial adjustment)
- Student information provided for the purpose of the NCCD does not explicitly identify any student. However, the School will disclose students' names to ISV, to undertake financial modelling about funding for particular students, including ongoing evaluation of the adequacy of the funding for individual students under the NCCD. ISV will not disclose a student's identity for the NCCD.



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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 have been implied); 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 servers which may be situated outside Australia.

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.

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 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.

Access 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. Students will generally be able to access and update their personal information through their Parents, but older Students



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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 any personal information the College holds about you or your child, please contact the College Principal 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.

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 by contacting the College Principal 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. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Complaints about breaches of privacy

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 Principal by writing. 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 practicable after it has been made.

Acknowledgement: This policy has been modified and produce from the Independent Colleges Council of Australia, Privacy Manuel 2018