

PEDARE CHRISTIAN COLLEGE PRIVACY POLICY

1. OBJECTIVES

Pedare Christian College (PCC) has a firm commitment to privacy. The College is subject to the Privacy Act 1998 (Cth) and the purpose of this Policy is to detail how the College complies with the Privacy Act and the Australian Privacy Principles.

INTRODUCTION

This policy describes:

- The types of personal information the College collects
- How the College holds information
- Who the information is collected from
- The purpose for which the information is collected, held, used and disclosed
- How a person can access information about themselves
- How a person can make an enquiry, raise a concern, make a complaint
- How a complaint or enquiry is handled by the College
- Whether there is likely to be a disclosure of personal information to any overseas recipients

2. DEFINITIONS

Workers: Management, Teachers, Student Teachers, General Staff, Coaches, Umpires, Volunteers of PCC, Contractors, Sub-Contractors.

College: Pedare Christian College Inc.

AISSA: Association of Independent Schools SA

3. PROCEDURES

Collection of Personal Information

The College will collect information via many means and the type of information depends on the role of the person in their relationship with the College.

Personal Information

The Privacy Act 1988 defines personal information as information or an opinion about an individual (whether true or not) whose identity is apparent, or can reasonably be ascertained from the information or opinion. If the information the College has, identifies the person or if the person's identity can be reasonably ascertained from such information, it will be considered personal information and it will be managed in accordance with this policy, the Privacy Act 1988 and the Australian Privacy Principles.

Personal information may include, but is not limited to, names, addresses, contact details, date of birth, next of kin details, financial information, photographic images and attendance records.

Sensitive Information

Sensitive information may include, but is not limited to, racial or ethnic origin; political opinion; photographic images; professional memberships; government identifiers; sexual orientation or practice; health status; age or gender. Any sensitive information the College may have access to about a person will be managed in the same way as personal information (above).

Health Information

The College may collect medical records; disabilities; immunisation details; individual health care plans, counselling reports, nutrition and dietary requirements.

Collection of Information

Ordinarily when it is reasonable and practical, the College will collect information about a person whether directly from that person or in the case of a student it may be collected via the enrolling parent/caregiver. Information may also be collected from other people or entities or other independent sources, however the College will use this method only when it is impractical or unreasonable to gather the information directly from the person.



The College will generally use forms for the collection of information but due to the nature of the core business, the College will sometimes collect information via telephone calls, emails, letters, face to face meetings, through financial transactions and notes.

Unsolicited personal information may be presented to the College, without the College having sought it through the normal means of collection. Unsolicited information will only be used, held or stored in the same way as all other personal information which the College would have collected. Unsolicited information will otherwise be destroyed or deleted permanently.

Use of Personal Information

The College will only use personal information that is reasonably necessary for one or more functions or activities (primary purpose) or for a related secondary purpose that would be reasonably expected or to which the person has consented.

Some primary uses of personal information include but are not limited to:

- Satisfying legal obligations and compliance in relation to:
 - duty of care
 - child protection
 - the ongoing operation of the College
- Providing education, pastoral care, extra-curricular and health services
- Keeping workers and the wider College community informed about Pedare community matters through letters, emails, newsletters and magazines
- Marketing, promotional and fundraising activities
- Supporting community based activities, causes and charities in connection with the College's functions or activities
- Assisting with the improvement of day to day functions such as staff training, systems development, curriculum development, planning and research
- Administration functions
- Employment of staff
- Training of pre-service teachers
- Engagement of contractors, volunteers or visitors.

All information is collected and used only as reasonably necessary for any of the above functions or activities, providing the College has the consent of the individuals about whom the information relates. If there is a threat to life, serious injury, health or safety or another general situation which is permitted within the legislation.

Disclosure to Third Parties

The College will use personal information for the purpose for which it was collected, that is, the primary purpose. There will however be times when it may be necessary for the College to disclose personal information to Government agencies, recipients of College publications, visiting teachers, counsellors, coaches, service providers and other recipients. This will only be done with the permission of the worker or other person identified by the information. From time to time it may be out of the control of the College to make this decision with the consent of the worker (as in the case of a medical emergency or legal proceedings). The College will take reasonable steps wherever possible to ensure breaches do not happen.

Disclosure to Overseas Recipients

It may be necessary to disclose personal information to an overseas location when planning College events such as overseas excursions and trips, when facilitating student exchanges or storing information within a cloud computing service (eg. in Singapore, Canada, New Zealand and the United States of America). The College will not ordinarily intentionally provide or disclose any of a worker's personal or sensitive information to a third party either within Australia or overseas without the consent of the worker. From time to time it may be out of the control of the College to make this decision with the consent of the worker (as in the case of a medical emergency or legal proceedings). The College will take reasonable steps wherever possible to ensure breaches do not happen.

Quality of Information

The College will take reasonable action to ensure all personal information held and used by the College is accurate and up to date where possible, at the time of collection. On an ongoing basis, personal information will be updated and individuals whose information has been changed will be advised by the College. Anyone advising the College of updated personal information is assured that new information provided will be treated with discretion and confidentiality.



Storage and Security of Information

Personal information is stored in a number of ways:

- On databases
- Hard copy files
- Personal devices, including laptop computers, android devices, ipads and mobile phones
- On electronic backup and archival systems

The security of personal information is taken very seriously by the College and reasonable steps are taken to ensure the information is secure. Unauthorised access, loss, modification or disclosure is controlled by the following:

- Restricting access to information contained on databases on a need to know basis
- Ensuring workers are aware they are not to reveal or share any information of a personal or sensitive nature
- Implementing policies and procedures in relation to confidentiality to ensure correct protocols are followed when handling personal information
- All workers sign a Code of Conduct, with stepped consequences as per the PCC Enterprise Agreement for breaches of the Code
- Hard copy files are kept in lockable filing cabinets in non-public access areas
- Staff employment files are kept in a lockable filing cabinet in an office with a restricted access key
- Security around the College perimeter is aimed at preventing damage or break-ins
- Implementation of ICT security systems, policies and procedures designed to protect personal information stored on devices across the College
- Undertaking due diligence in relation to third party providers who may have access to personal information, including cloud computing or email service providers to ensure they are aware of and compliant with the Australian Privacy Principles or similar.

Information which the College is required, by law to keep, is archived and stored in a locked archive facility with restricted access, for the period of time the College is required to keep it. Electronic data held by the College is kept in a number of secure locations both on and offsite and is accessible by the Principal or delegate. The College supports and follows the Association of Independent Schools SA (AISSA) policy regarding the storage and retention of information.

Information held by the College which is no longer required is destroyed in a secure manner, deleted or de-identified as appropriate.

The College does not share personal information with other websites which may access the College website. The College is not responsible for the privacy practices of these websites.

How to gain access to personal information held by the College

An individual may contact the College to advise of changes to personal information or to access personal information. At least 48 business hours' notice must be given and an appointment arranged to access information.

Complaints

Should an individual wish to make a complaint about a breach by the College of any of the Australian Privacy Principles, they may do so by addressing an email or letter to the College Principal. The College will respond to a complaint within 30 days but may need to seek further information from the complainant to enable a full response to be made.

4. RELATED DOCUMENTS

- Pedare Christian College Enterprise Agreement
- PC 004 Code of Conduct
- IT 002 ICT Acceptable Use Policy for Staff
- IT 004 ICT Acceptable Use Policy for Students
- IT 008 BYOD Policy