



RIVERMOUNT COLLEGE

Realising the Potential Within

8.10.01 PRIVACY POLICY

PURPOSE OF THIS POLICY

Rivermount College is bound by the Australian Privacy Principles contained in the *Commonwealth Privacy Act 1988*. This statement outlines the Privacy Policy of the College and describes how the College uses and manages personal information provided to or collected by it.

SCOPE

The Policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the College site; and describes the type of information the College collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

EXCEPTION IN RELATION TO EMPLOYEE RECORDS

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record held by the employing entity. 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.

RESPONSIBILITY

Principal reporting to the Board of Directors.

LEGISLATION AND REFERENCES

[Privacy Act 1988 \(Cth\)](#)

[Privacy Amendment \(Enhancing Privacy Protection\) Act 2012](#)

Child Protection Policy 08.01.01

Disabilities Policy 04.15.01

Area: 8.0 Legal and Compliance	Policy: 8.10.01 Privacy	Current Version: D- Ext. (Aug 2017) Original Release: March 2014	Page 1 of 6
Approved by Executive Committee: Aug 2017	Approved by Compliance Committee: March 2014	Approved by Board of Directors:	Next Review Date: 2018

POLICY STATEMENT

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*.

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 ('Parents') 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, previous school and religion;
 - 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;
 - counselling reports;
 - health fund details and Medicare number;
 - any court orders;
 - volunteering information; and
 - 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; and
- 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. On occasions people other than parents and students provide personal information.

Area: 8.0 Legal and Compliance	Policy: 8.10.01 Privacy	Current Version: D- Ext. (Aug 2017) Original Release: March 2014	Page 2 of 6
Approved by Executive Committee: Aug 2017	Approved by Compliance Committee: March 2014	Approved by Board of Directors:	Next Review Date: 2018

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.

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 for the students, exercise its duty of care, and perform necessary associated administrative activities, which will enable pupils to take part in all the activities of the College. This includes satisfying the needs of parents, the needs of the students 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;
- looking after student's 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 students or permit the students to take part in a particular activity.

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;
- in seeking funds and marketing for the College; and
- to satisfy 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 Alumni associations, to enable the College and the volunteers to work together.

Area: 8.0 Legal and Compliance	Policy: 8.10.01 Privacy	Current Version: D- Ext. (Aug 2017) Original Release: March 2014	Page 3 of 6
Approved by Executive Committee: Aug 2017	Approved by Compliance Committee: March 2014	Approved by Board of Directors:	Next Review Date: 2018

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's Families and Friends Association, Alumni, or, on occasions, external 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.

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, volunteers, counsellors and providers of learning and assessment 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 magazines;
- students' parents/guardians;
- anyone you authorise the College to disclose information to; and
- anyone to whom the College is required to disclose the information to by law.

Sending Information Overseas

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school 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); 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.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for

Area: 8.0 Legal and Compliance	Policy: 8.10.01 Privacy	Current Version: D- Ext. (Aug 2017) Original Release: March 2014	Page 4 of 6
Approved by Executive Committee: Aug 2017	Approved by Compliance Committee: March 2014	Approved by Board of Directors:	Next Review Date: 2018

Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. College personnel and the AIS and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.

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 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 and Correction of Personal Information

Under the Commonwealth Privacy Act, 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. 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 update any personal information the College holds about you or your child, please contact the 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 students, and notice to parents will act as notice given to the students.

Area: 8.0 Legal and Compliance	Policy: 8.10.01 Privacy	Current Version: D- Ext. (Aug 2017) Original Release: March 2014	Page 5 of 6
Approved by Executive Committee: Aug 2017	Approved by Compliance Committee: March 2014	Approved by Board of Directors:	Next Review Date: 2018

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the Principal. 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 students.

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 so warranted.

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 Principal. 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.

Area: 8.0 Legal and Compliance	Policy: 8.10.01 Privacy	Current Version: D- Ext. (Aug 2017) Original Release: March 2014	Page 6 of 6
Approved by Executive Committee: Aug 2017	Approved by Compliance Committee: March 2014	Approved by Board of Directors:	Next Review Date: 2018