

COVENANT COLLEGE

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PRIVACY POLICY

Intent

Covenant College is bound by the Australian Privacy Principles (APPs) found in the *Privacy Amendment Act 2012*, and in relation to health records the College is bound by the Health Privacy Principles found in *The Health Records Act 2001 (VIC)*. The Covenant College Privacy Policy, which is directed and informed by the APPs, sets out how Covenant College manages personal information provided to or collected by the college. In accordance with these regulations and in addition to management and use of information, Covenant College also has specific procedures in place for the process of requesting and correcting information, as well as the process of making a complaint.

Covenant College may from time to time, review and update this Privacy Policy to take into account new laws and technology, changes to the schools' operations and practices and to make sure it remains appropriate to the changing school environment.

Collection of Personal Information

The type of information 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 before, during and after the course of a student's enrolment;
- job applicants, staff members, volunteers and contractors; and
- other people who come in 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 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 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.

Exception in relation to employee records

Under the *Privacy Amendment Act 2012*, and *The Health Records Act 2001 (VIC)* 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.

Use of Personal Information

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 you have consented.

Students and Parents

In relation to personal student and parent/guardian information, the College's primary purpose of collection is to enable the School to provide schooling for the student. This includes satisfying both the needs of parents/guardians 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 student (including the use of photographs) and parent information includes:

- to keep parents/guardian informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day to day administration;
- looking after a student's educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the School; 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 obtained, the College may not be able to enrol or continue the enrolment of a student or permit the student to take part in a particular activity.

Job Applicants, Staff Members and Contractors

In relation to personal information of job applicants, staff and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor.

The purposes for which the College uses personal information of job applicants, staff members and contractors include:

- administering the individual's employment or contract;
- satisfying insurance requirements;
- seeking funds 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 conducting associated activities, to enable 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 it continues to be a quality learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to an organisation solely for the purpose of assisting with the School's fundraising activities.

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 and sometimes visual images, may be used for marketing purposes. Photos of students are only published with parental/guardian consent.

Disclosure of Personal Information

With consent, the College may disclose personal information, including sensitive information held about an individual to:

- another school;
- government departments;
- medical practitioners;
- people providing services to the college, including specialists visiting teachers and sports coaches;
- recipients of college publications, like newsletters and magazines;
- newspapers;
- parent associations/committees;
- other parents or guardians;
- anyone the college authorizes to disclose information to; and
- anyone to whom the College is required to disclose the information by law.

Sending Information Overseas

The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia or to facilitate a school exchange. However, the College will not send personal information about an individual outside Australia without:

- obtaining consent of the individual (in some cases, consent will be implied); or
- otherwise complying with the Australian Privacy Principles.

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, sexual preferences, criminal record and health 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 the individual agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and Security of Personal Information

The College staff is required to respect the confidentiality of students', parents' and guardians' 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 the computerised records.

Updating Information

The College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the College at any time.

Access and correction of personal information

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which Covenant College holds about them and to advise Covenant 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, but older students may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

Requesting Information

All requests for information must go through the Covenant College Privacy Officer. Requests must be made in writing or via email and will be responded to within a two week time frame. Covenant College is required to give an individual access to the personal information it holds about that individual, in the manner requested by the individual if so practicable, unless an exception applies. If the information sought is extensive, the college will advise the likely cost in advance. Where requests for information are refused, Covenant College will provide to the individual a written explanation and information about the mechanisms available to complain about the refusal.

Making a complaint

All complaints relating to Covenant College's enactment of Australian Privacy Principles (APPs) should be forwarded in writing to the Covenant College Privacy Officer. The complaint should outline clearly how the complainant believes Covenant College has breached its responsibility to the individual in terms of privacy. This includes the type of information the individual believes has been misused and the way in which it has been misused. The complainant should expect to receive correspondence from Covenant College in relation to their claim within 30 working days. If the complainant is not satisfied with Covenant College's response they are able to make a further complaint to the Office of the Australian Information Commissioner (OAIC). The website contact for the Commissioner is as follows: enquiries@oaic.gov.au or phone enquiries can be made on 1300 363 992.

Correcting information

Covenant College is required to take reasonable steps to correct personal information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete, relevant and not misleading. Individuals are able to make requests that personal information held by the organisation is corrected. Requests for correction can be made in writing to the Covenant College Privacy Officer. The individual should expect a response to the correction request within a two week period. If for some reason here is a refusal on behalf of Covenant College to correct information; the individual shall be notified in writing as to the reasons for the refusal and will also be provided with information about the mechanisms to make a complaint to the OAIC.

Consent and rights of access

Covenant 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/guardians. The College will treat consent given by parents/guardians as consent given on behalf of the student and notice to parents will act as notice given to the student.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the Assistant Principal who is the College's delegated Privacy Officer. 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.

Covenant 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 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.