

This Privacy Policy sets out how CBC St Kilda manages personal information provided to or collected by it.

CBC is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. In relation to health records, CBC is also bound by the *Health Records Act 2001 (Vic.)*.

CBC 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 CBC collect and how does CBC collect it?

The type of information CBC collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- pupils and parents and/or guardians ('Parents') before, during and after the course of a pupil's enrolment at CBC St Kilda
- job applicants, staff members, volunteers and contractors
- other people who come into contact with CBC.

**Personal Information you provide:** The College will generally collect personal information held about an individual by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and pupils 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 Act 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.

### How will CBC use the personal information you provide?

CBC 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.

**Pupils and Parents:** In relation to personal information of pupils and Parents, CBC's primary purpose of collection is to enable the College to provide schooling for the pupil. This includes satisfying the needs of Parents,

the needs of the pupil and the needs of College throughout the whole period the pupil is enrolled at CBC.

The purposes for which the College uses personal information of pupils 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 pupils' educational, social and medical wellbeing
- seeking donations and marketing for the College
- to satisfy CBC's legal obligations and allow the College to discharge its duty of care.

In some cases where the College requests personal information about a pupil or Parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the pupil or permit the pupil 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 CBCs 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 CBC 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
- seeking donations and marketing for the College
- to satisfy CBC's legal obligations, for example, in relation to child protection legislation.

**Volunteers:** CBC 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.

**Marketing and fundraising:** CBC St Kilda 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 pupils and staff thrive.

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.

## How does CBC treat sensitive information?

In referring to 'sensitive information', CBC 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

CBC's staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

CBC 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.

## Who might CBC disclose personal information to and store your information with?

CBC 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 specialist visiting teachers, counsellors and sports coaches
- anyone you authorise the College to disclose information to
- anyone to whom we are required to disclose the information to by law.

CBC may disclose personal information, excluding sensitive information, held about an individual to:

- recipients of College publications, such as newsletters and magazines
- Parents.

**Sending and storing information overseas:** CBC 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.

CBC may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

## Access and correction of personal information

Under the Commonwealth Privacy Act and the *Health Records Act 2001 (Vic.)*, an individual has the right to obtain access to any personal information which CBC holds about them and to advise the College of any perceived inaccuracy. Pupils will generally be able to access and update their personal information through their Parents, but older pupils 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 CBC 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 pupils

CBC 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 pupil to the pupil's Parents. The College will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

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 pupil.

CBC may, at its discretion, on the request of a pupil grant that pupil access to information held by the College about them, or allow a pupil 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 pupil and/or the pupil's personal circumstances so warranted.

## Enquiries and complaints

If you would like further information about the way CBC 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.