

Overview

This *Privacy policy* sets out how Portside Christian College (the College) manages personal information provided to or collected by it. The College is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth [Privacy Act 1988](#) (the Act).

The College will review and update this *Privacy policy* from time to time 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 school 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/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, gender, language background, nationality, country of birth and previous school;
 - religion, church and referring pastor;
 - parents' education, occupation, language background, religion;
 - medical information (e.g. details of disability and/or allergies, absence notes, immunisation records, accident reports, medical certificates, medical reports, names of doctors, nutrition and dietary requirements, psychological reports);
 - conduct and complaint records, or other behaviour notes, and school reports;
 - information about referrals to government welfare agencies;
 - counselling reports;
 - health fund details and Medicare number;
 - custody details and any court orders;
 - correspondence with parents;
 - 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, residency status, religion, country of birth, nationality;
 - information on job application;
 - professional development history;
 - teacher registration number;
 - salary and payment information, including superannuation details and tax file number;
 - criminal record checks and working with children clearances;
 - medical information (e.g. details of disability and/or allergies, medical certificates, compensation claims);
 - 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.

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.

Collection of personal information from credit providers

The College does not collect personal information from parents' credit providers or credit reporting bodies.

Exception in relation to employee records

Under the 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.

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 are 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 to students enrolled at the school, 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:

- 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 students' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the College;
- to refer unpaid debts to a debt collection agency;
- to contribute to aggregated data that Portside Christian College may require from time to time to meet its reporting, planning, contract and funding responsibilities; 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, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the College; and
- contributing to aggregated data that Portside Christian College may require from time to time to meet its reporting, planning, contract and funding responsibilities;
- 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 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 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 such as an internal fundraising committee or external fundraising provider. The College will not disclose an individual's personal information to third parties for their own marketing purposes without the individual's consent.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. Individuals can opt out of receiving marketing and promotional material from the College at any time by contacting the Privacy Officer. 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:

- Students' parents;
- Other schools and staff at those schools;
- Government departments (including for policy and funding purposes);
- Medical practitioners;
- People providing educational, support and health services to the College (e.g. specialist visiting teachers, sports coaches, volunteers, consultants and counsellors);
- Providers of specialist advisory services and assistance to the College, including in the areas of Human Resources, child protection and students with additional needs;
- 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;
- Portlife Church staff;
- Insurance companies;
- Anyone you authorise the College to disclose information to; and
- Anyone to whom the College is required or authorised to disclose the information to by law (e.g. under child protection laws and the Department for Child Protection's [Information sharing guidelines for promoting safety and wellbeing](#)).

Sometimes the College may ask individuals to consent to some disclosures of uses of personal information for certain purposes, either in writing or verbally. In other cases, consent may be implied.

Photographs and videos

Information such as academic and sporting achievements, student activities and similar news is sometimes published in College newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, camps and excursions. The College will obtain permissions annually from the student's parent (and from the student if appropriate) if we would like to include such photographs or videos or other identifying material in our promotional material or otherwise make this material available to the public such as on the internet.

Overseas disclosure

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or missions trip. 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 the cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides the *G Suite for Education* 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 *G Suite for Education* 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.

How is personal information stored and secured?

We store personal information in a variety of ways including in physical files, on our network, and in online database and storage services. The security of your personal information is of importance to us and the College has in place various measures to protect the personal information the College holds from misuse, interference and loss, unauthorised access, modification or disclosure including locked storage of paper records and password access rights to digital records.

How can I access and correct personal information?

Under the 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 may seek access and correction themselves. There are some exceptions to these rights set out in the Act.

To make a request to access or to update any personal information the College holds about you or your child, please contact the Privacy Officer (see contact details at end of policy). 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.

Access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the student, or where students have provided information in confidence. If access is refused you will be provided 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 Privacy Officer (see contact details at end of policy). 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.

Enquiries and complaints

If you would like further information about the way the College manages the personal information it holds or wish to complain because you believe that the College has breached the APPs please contact the Privacy Officer (see contact details below). 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.

Contact Details

For more information contact the Privacy Officer:

Portside Christian College
1 Causeway Rd
NEW PORT SA 5015
(08) 8341 5133
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www.portside.sa.edu.au