



Primary Only	Secondary Only	Combined Policy
Both Campuses	<i>Taylor's Hill Only</i>	<i>Mernda only</i>
Policy Type: Welfare		

RATIONALE

Gilson College (the College) is bound by the National Privacy Principles contained in the Commonwealth Privacy Act 1988. The information used by the College, its staff and students, and the information provided to the College, by parents and others needs to be protected to prevent the misuse of information and the breach of privacy within the College community.

IMPLEMENTATION

General

1. It is the responsibility of the Principal to ensure that this Privacy Policy is updated as required to remain compliant with government regulations.
2. A covering privacy statement is to be included with all data/information collection from parents. This statement would be as follows:

Gilson College adheres to the National Privacy Principles in its use and storage of all information. For a copy of the College's Privacy Policy please contact the College.

3. Enrolment information is to include the signature of the enrolling parent(s) indicating that they have read and accept the Privacy statement.
4. When destroying College records that contain personal information they are to be disposed of in a secure manner, e.g. by shredding or through Confidential Waste Paper Destruction Service.
5. The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Schools' operations and practices and to make sure it remains appropriate to the changing College environment.

Types of Information

6. The information collected and held at the College includes, but is not limited to, personal and sensitive information about:
 - Students and their parent(s)/guardian(s) before, during and after the course of the student's enrolment at the College;
 - Staff members, volunteers, contractors, and job applicants;
 - Other individuals and organisations dealing with the College;
7. Personal information about an individual will be collected and held at the College by way of forms filled out by parents or students, face-to-face meetings and interviews, telephone calls and emails. On occasions people other than parents and students provide personal information.

8. In some circumstances personal information may be provided about an individual from a third party, for example a report provided by a medical professional or a reference from another school.

Use of Information

9. Personal information collected at the College will be used for the primary purpose of education, and for such other secondary purposes that are related to the primary purpose and reasonably expected, or to which the individual has consented.
10. In relation to personal information of students and parents, the primary purpose of collection is to enable schooling to be provided 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.
11. The purposes for which personal information of students and parents is used at the College includes:
 - To keep parents informed about matters related to their child's schooling;
 - Day-to-day administration;
 - Looking after students' educational, social, physical and spiritual well-being;
 - Seeking funding and marketing for the College;
 - To satisfy legal obligations and allow the College to discharge its duty of care;
12. In some cases, **where requests for** personal information about a student or parent **are made**, and the information is not obtained, the student may not be enrolled or continue **to be enrolled** at the College.
13. In relation to personal information of job applicants, staff members and contractors, the primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as applicable.
14. The purpose for which personal information of job applicants, staff members and contractors **is used at** the College includes:
 - Administering the individual's employment or contract;
 - For insurance purposes;
 - Seeking funds and marketing for the College;
 - To satisfy legal obligations;
15. Personal information **is also obtained at the College** 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.
16. Marketing and seeking funds for future growth and development **is treated** as an important part of ensuring that the College continues to be a quality learning environment. Personal information held **at** the College may be disclosed to an organization that assists in the College's fundraising, for example, My*Mission or the Alumni Association.
17. 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.

Disclosure of Information

18. The **disclosure of** personal information **that is held at the College will be** carefully considered before being conducted.
19. Personal information, including sensitive information, held about an individual **may be disclosed** to third parties such as:
 - Another school;
 - Government departments;

- Medical practitioners;
 - People providing services to the College, including specialist visiting teachers and sport coaches;
 - Recipients of College publications, like newsletters and magazines;
 - Parents;
 - Anyone authorised to receive information;
20. Personal information about an individual **that is held at the College will not be disclosed** to third parties or outside Australia without:
- Obtaining the consent of the individual, or in the case of a child, the parent. (in some cases this consent will be implied);
 - Otherwise complying with the National Privacy Principles;

Personal and Sensitive Information

21. **In reference to this policy** 'sensitive information' 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, or criminal record, that is personal information, and health information about an individual.
22. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, or the use or disclosure of the sensitive information is allowed by law.
23. College staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.
24. Health information is vital information for duty of care and parents must disclose any illness affecting their child/children. It is necessary to ensure that all health information records are up to date for the College to take necessary precautions and to be able to respond promptly.
25. Steps **have been** adopted to protect the personal information **that is held at** the College from misuse, loss, unauthorized access, modification or disclosure by use of various methods including locked storage of paper records and protected access to digitised records. These steps should be enacted when necessary.
26. Endeavours **are consistently made to** ensure that personal information **that is held at the College** is accurate, complete and up-to-date. An individual may seek to update their personal information **that is held at** the College by contacting the Office at any time.
27. The National Privacy Principles **require that** personal information is **stored** no longer than necessary.

Access to Information

28. **Under amendments to** the *Privacy Act* made in 2018, an individual has the right to obtain access to any personal information **that is held at** the College about them and advise of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally have access to their personal information through their parents, but adult or independent students may seek access themselves.
29. To make a request to access any information **that is held at** the College a request must be made to the College Principal in writing.
30. **Verification** of an individual's identity **may be required** when a request is made. A fee **may be charged** to cover the cost of verification and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the **applicant will be** advised of the likely cost in advance.
31. Every parent's right to make decisions concerning their child's education **is respected at the College.**

32. Generally, any requests for consent and notices in relation to the personal information of a student **will be referred** to the student's parents. **Consent given by parents will be treated** as consent given on behalf of the student and notice to parents will act as notice given to the student.
33. Parents may seek access to personal information **that is held at** the College about them or their child by contacting the College **Office**. However, there **may** be occasions where 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.
34. The College **leadership** may, at its discretion, on the request of a student, grant that student access to information **that is held at** 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 when the maturity of the student and/or the student's personal circumstances so warrant.

Archiving and securing documentation

35. All records must be stored in safe and secure locations to ensure their integrity and accessibility.
36. Permanent records must be stored in conditions that ensure their long-term preservation.
37. Schools may contact Records and Digitisation Services to arrange the transfer of permanent records and historic records to the State Archives if no longer needed.

Relevant Documentation or legislation

- *Commonwealth Privacy Act (1988).*
- *ASV Privacy Policy*
- *Gilson College Use of Images Policy.*
- *Gilson College Secure Areas Policy.*
- *Gilson College Management of Records Policy.*
- *Gilson College Notifiable Data Breaches Policy.*

This policy was shared with Taylors Hill staff May 2014

This policy was shared with Mernda staff Jul 2022

This policy was checked by ADCOM Nov 2022

This policy was ratified by the College Council Jul 2014

This policy was updated Nov 2022

This policy is due for review by 2024