

Privacy Policy

Version 3.0

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Version History

Version	Date	Notes
1.0	15-11-05	Draft Document for Board Approval
2.0	03-03-06	Updated Policy
2.1	04-11-08	Policy Review and re-issue
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Your Privacy is important

This statement outlines how Richmond Christian College (RCC) uses and manages personal information provided to or collected by it, for the well-being of students in its care; and that provided by staff employed by the school.

RCC is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988, Privacy Amendment (Enhancing Privacy Protection) Act 2012 and the New South Wales Privacy Principles which are contained in the Health Records and Information Privacy Act 2002 (Health Records Act).

RCC may, from time to time, review and update this Privacy Policy to take account of: new laws and technology; changes to RCC's operations and practices; and to make sure it remains appropriate to the changing school environment.

What kind of personal information does RCC collect and how does RCC collect it?

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

- Students, parents and/or guardians ('**Parents**') before, during and after the course of a student's enrolment at RCC;
- job applicants, staff members and their families, volunteers and contractors; and
- other people who come into contact with RCC.

Personal information you provide: RCC 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 RCC 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 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 RCC's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between RCC and employee.

Collection Notice Advice

Before information is collected, or as soon as practicable afterwards, the School will make the individual to whom the information relates aware of the following:

- The fact that information is being collected
- The purpose for which the information is being collected
- The intended recipients of the information
- Whether the supply of information by the individual is required by law, or is voluntary; and any consequences for the individual if the information is not provided, or part not provided
- The existence of any right of access to, and correction of, the information

This information is outlined in the 'Standard Collection Notice'; 'Contractor/Volunteer Collection Notice' and 'Employment Collection Notice'. (Appendix)

How will the School use the personal information you provide?

RCC will use personal information provided to it for the primary purpose of collection; and for related secondary purposes which may be reasonably expected, or to which you have consented.

Students and Parents: In relation to personal information of students and Parents, RCC's primary purpose of collection is to enable RCC to provide schooling for the student. This includes satisfying both the needs of Parents and the needs of the student throughout the whole period the pupil is enrolled at RCC.

The purposes for which RCC uses personal information of student and Parents include:

- keeping Parents informed about matters related to their child's schooling, through correspondence, reports, newsletters and magazines;
- day-to-day administration;
- looking after our student's education, social and medical wellbeing;
- seeking donations and marketing for RCC;
- satisfying RCC's legal obligations, and allowing RCC to discharge its duty of care.
- Complying with Federal and State reporting requirements
- Investigating incidents or defending any legal claims against the School, its services or staff
- Celebrating the efforts and achievements of students

In some cases where RCC requests personal information about a student or Parent, if the information requested is not provided, RCC may not be able to enrol or continue the enrolment of the student or permit the student to take part in a specific activity.

Job applicants, staff members and contractors: In relation to personal information of job applicants, staff members and contractors, RCC'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 purpose for which RCC 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, such as public liability or Work Cover;
- seeking donations and marketing of RCC;
- to satisfy RCC's legal obligations, for example, in relation to child protection legislation.
- Investigating incidents, or defending legal claims about the School, its services or staff

Volunteers: RCC also obtains personal information about volunteers who assist RCC in its functions, or in the conduct of associated activities, to enable RCC and the volunteers to work together in an effective and efficient manner.

Marketing and fundraising: RCC treats marketing and seeking donations for the future growth and development of RCC as an important part of ensuring that RCC continues to be a quality-learning environment in which both students and staff thrive. Personal information held by RCC may be disclosed to an organisation that assists in RCC's fundraising.

Parents, staff, contractors and other members of the wider school community may from time to time receive fundraising information. School publications such as newsletters and magazines that include personal information may be used for marketing purposes.

Who might RCC disclose personal information to?

RCC may disclose personal information, including sensitive information, held about an individual to:

- another school;
- government departments
- medical practitioners;
- people providing services to RCC, including specialist visiting teachers, music tutors and sports coaches;
- recipients of school publications, such as newsletters and magazines;
- parents;
- anyone you authorise RCC to disclose information to; and
- Anyone to whom RCC is required to disclose information to by law

Sending information overseas: RCC 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

How does RCC treat sensitive information?

In referring to 'sensitive information', RCC means: information relating to a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices, or criminal record, that is also personal information; 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 agreed otherwise, or the use or disclosure of the sensitive information is allowed by law.

As a Christian community concerned for its members; staff, students and parents regularly pray for each other. At times this will involve disclosing personal and sensitive information, eg: with regard illness, accident, birth or engagement, to others. If you give us such information we will assume you are happy for us to use it in this way, unless you specifically ask us to keep it confidential.

Management and security of personal information

RCC's staff are required to respect the confidentiality of student's and Parent's personal information, and the privacy of individuals.

RCC has steps in place to protect the personal information RCC holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records, and pass worded access rights to computerised records, and restricting access to relevant people in areas where personal information is stored.

Updating personal information

RCC 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 RCC by contacting the office at any time.

The Australian Privacy Principles require RCC not to store personal information longer than necessary.

You have the right to check what personal information RCC holds about you

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information that RCC holds about them, and to advise RCC 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 older students may seek access and correction themselves.

To make a request to access any information RCC holds about you or your child, please contact the Principal in writing.

RCC may require you to verify your identity and specify what information you require. RCC 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, RCC will advise the likely cost in advance.

Denial of Access to Personal Information

Access to personal information will be denied in all cases such as where:

- It would pose a serious or imminent threat to the life or health of an individual
- Release may result in a breach of the School's duty of care to the student
- It would have an unreasonable impact on the privacy of other individuals
- It is likely to prejudice the prevention, detection, investigation, prosecution or punishment of an unlawful activity, the activities of a law enforcement agency, or legal proceedings
- The request is frivolous or vexatious
- The information relates to existing or anticipated legal proceedings between the parties, and the information would not be accessible through legal procedures
- Providing access would be unlawful
- Denying access is required or authorised by or under law

Consent and rights of access to the personal information of students

RCC respects every Parent's right to make decisions concerning their child's education.

Generally, RCC will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. RCC 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.

RCC may, at its discretion, on the request of a student grant that student access to information held by RCC 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 warrant.

Employment Records

Employee records and acts done by RCC as the employer of staff, if directly related to a current or former employment relationship are exempt from the application of the Privacy Act 1988.

Examples of this type of information include the terms and conditions of employment, personal contact details, performance and conduct and salary details.

Accordingly, the school may access and use personal information about employees when appropriate.

Complaints

Any complaints about the way RCC has handled personal information should be made in writing and directed to the Principal.

RCC will investigate the complaint and will notify you of the making of a decision in relation to your complaint as soon as practicable after it has been made.

Enquiries

If you would like further information about the way RCC manages the personal information it holds, please contact the Principal.

STANDARD COLLECTION NOTICE

1. Richmond Christian College (RCC) collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at RCC. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable RCC to provide schooling for your child and to enable them to take part in all activities of the School.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable RCC to discharge its duty of care.
3. Laws governing or relating to the operation of schools require that certain information is collected and disclosed. These include relevant Education Acts, Work Health and Safety (including Health Acts), and Child Protection laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We ask you to provide medical details about students for duty of care and relevant risk assessment.
5. From time to time RCC discloses personal and sensitive information to others for administrative and education purposes, including to facilitate the transfer of a student to another School. This includes, but is not limited to: other schools; government departments; medical practitioners; and people providing services to RCC, including specialist visiting teachers, sport coaches, tutors and volunteers.
6. If we do not obtain the information referred to above we may not be able to enrol or continue the enrolment of your child.
7. Personal information collected from students is regularly disclosed to their parents or guardians. On occasions information such as academic and sporting achievements, students' activities and other news is published in school newsletters, magazines and on our website. Individual or group photos may also be published in the school's newsletter or magazine. You must advise us if you do not wish photos of your child to appear in such publications.
8. Parents may seek access to personal information collected about them and their child by contacting RCC. Students may also seek access to personal information about them. However, there will be occasions when access is denied. Such occasions would include those where: access would have an unreasonable impact on the privacy of others; where access may result in a breach of RCC's duty of care to the student; or where students have provided information in confidence.
9. RCC's Privacy Policy also sets out how you may complain about a breach of privacy and how the School will deal with such a complaint.
10. RCC from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in RCC's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
11. We may include your contact details in a class list and/or school directory. In the case of publicly available school directories, if you do not agree to this you must advise us prior to the publication of such directories. In the first instance, we will notify you of our intention to publish such a directory.
12. If you provide RCC with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that: you are disclosing that

information to RCC and why; they can access that information if they wish; and that RCC does not usually disclose the information to third parties.

13. As a Christian community concerned for its members, staff, students and parents regularly pray for each other. At times this will involve disclosing personal and sensitive information, eg: with regard illness, accident, birth or engagement, to others. If you give us such information but do not want it used in this way please advise us at the time of notification.
14. Copies of Richmond Christian College's Privacy Policy are available from the office.

CONTRACTOR/VOLUNTEER COLLECTION NOTICE

1. In applying to provide services to the School, you will be providing Richmond Christian College with personal information. We can be contacted at: 7 Gallans Road, Ballina NSW; or by phone (02) 66867847.
2. If you provide us with personal information, e.g. your name and address, or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for the length of the job in hand, or keep it on file for future reference.
4. The School's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the Australian Privacy Principles.
5. We will not disclose this information to a third party without your consent.
6. We may require a Working with Children Check from you under Child Protection Law.
7. If you provide us with the personal information of others, e.g. medical practitioners or next of kin, we encourage you to inform them that you are disclosing that information to RCC, and why, that they can access the information if they wish, and that the School does not usually disclose the information to third parties.

EMPLOYMENT COLLECTION NOTICE

1. In applying for this position you will be providing Richmond Christian College with personal information. We can be contacted at 7 Gallans Road, Ballina NSW; or by phone (02) 66867847.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy contains details of how you may complain about a breach of the Australian Privacy Principles, or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
4. We will not disclose this information to a third party without your consent.
5. We are required to collect Working with Children Check information under Child Protection laws.
6. If you provide us with the personal information of others, e.g. medical practitioner or next of kin, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that RCC does not usually disclose the information to third parties.