



PRIVACY POLICY & PROCEDURE

BACKGROUND & PURPOSE

Christadelphian Heritage College Sydney ("CHCS") receives personal information, including potentially sensitive information, about:

- Students and parents and/or guardians before, during and after the course of a student's enrolment at the College;
- Job applicants, staff members, volunteers and contractors; and
- Other people who come into contact with the College.

For the purposes of this policy, personal information may include sensitive information.

CHCS may directly collect personal information about an individual (e.g. by means of forms filled out by parents/guardians or students) or in some circumstances the College may be provided with personal information about an individual from a third party (e.g. a report provided by a medical professional or a reference from another school).

In March 2014 the Privacy Act 1988 was updated. This legislation regulates the way schools can collect, use, keep secure and disclose personal information. Schools are required to handle personal information in accordance with the Australian Privacy Principles.

The purpose of this policy and procedure is to set out the steps that CHCS will take to protect and manage personal information it acquires and retains.

POLICY STATEMENT

CHCS will manage personal information in accordance with the thirteen (13) Australian Privacy Principles, and the principles of the Privacy Act 1988 (Cth) and the Personal Information Protection Act 1998 (PIPA Act).

All personal information will be collected and retained only if it is necessary and for a lawful purpose.

CHCS will only use personal information held about an individual for the purpose for which it was provided or for a directly related secondary purpose or where it is allowed by law.

CHCS will only disclose personal information held about an individual to a third party where it is required or allowed to do so by law, or where the parent(s)/guardian (in the case of a student) or an individual agrees for personal information to be released. This may include to:

- another school, as required;
- Government departments, as required;
- medical practitioners;
- cyber security or WHS providers;

- people providing services to the College, such as specialist visiting teachers or tutors;
- recipients of College publications, such as newsletters;
- anyone who a parent/guardian of a student or an individual authorises the College to disclose personal information to.

CHCS’s primary purpose of collecting personal information of students and parents is to enable the College to provide schooling for the student. This may include:

- To keep parents informed about matters relating to their child's education, through correspondence, newsletters and reports;
- Day-to-day administration;
- Looking after student's educational, social, spiritual and medical well-being;
- Seeking donations and marketing for the College;
- To satisfy the College's legal obligations and allow the College to discharge its duty of care.

The College will endeavour to ensure that the personal information it holds is accurate, complete and current.

PROCEDURE

CHCS will have in place processes to protect personal information the College holds, including locked storage of paper records and password protected access rights to computerised records.

Where,

- access to personal information held by CHCS is requested by a third party;
- the provision of this information is not required or allowed by law; and
- the individual has not given prior consent to the College for their personal information to be released,

the approval of the individual for their personal information to be released to that third party should first be obtained by the Principal or Business Manager of the College before the requested information can be provided, unless it is deemed necessary for the day-to-day function of the College’s operation or in carrying out its duty of care.

Personal information held by CHCS which is no longer required to be retained by the College will be disposed of in a confidential manner.

Under the Privacy Act, an individual has the right to check what personal information the College holds about them and obtain access to this personal information to advise the College of any perceived inaccuracy. A person may seek access to their own personal information held by the College, including to update their personal information, by contacting the Business Manager.

Where an individual believes that this policy has been breached in relation to their personal information, they should raise their concern with the Business Manager or the Principal. Any such complaint is to be objectively and expeditiously investigated by a person with no conflict of interest.

ACCOUNTABILITIES

Position	Accountabilities
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Position	Accountabilities
All staff (including volunteers)	<ul style="list-style-type: none"> • Implement this policy
Principal and Business Manager	<ul style="list-style-type: none"> ▪ Ensure processes are in place to maintain personal information held by the College which is accurate, complete and current. ▪ Ensure processes are in place to protect and provide access to personal information in line with this policy.

AWARENESS

This policy should be available to all staff (including volunteers) and parents/guardians of students enrolled in the College.

DEFINITIONS

Term	Definition
Personal information	Information or opinion ... about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. (S4 Privacy and Personal Information Protection Act 1998).
Sensitive information	This may include information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences, domestic/family situation or a criminal record and health information.

REFERENCES

Documents that should be referred to in conjunction with this policy are listed below:

Document Type	Title
Legislation	Australian Privacy Principles; Privacy Act 1988 (Cth); Personal Information Protection Act 1998 (PIIP Act).
Code of Practice	
Standards	
Other Policies	
Guides	
Forms	

DOCUMENT CONTROL

1. Ownership and Approval of this Document

Role	Name	Position title	Date
Owner		Principal	July 2018
Approver	College Board		July 2018

2. Review

Stage	Date
Original Policy/Procedure	13 November 2014
Policy/Procedure revised	July 2018
This review	July 2018
Next review due	July 2023