

## Privacy Policy

### 1.0 Information

Kardinia International College (the College) is committed to protecting the privacy of individuals. The College supports and endorses the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (Privacy Act) and will only collect, use, disclose, and store personal information in accordance with these principles. The College will also comply with the requirements of the Health Records Act 2001 (Vic) (Health Records Act).

The College is required under the Privacy Act to have a clearly expressed and up-to-date privacy policy about how the School manages personal information. This policy outlines how the College will comply with its obligations under the Privacy Act and the Health Records Act. The College will ensure that this policy is made available on the College's website.

### 2.0 Definitions

- **Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not; and the information or opinion is recorded in a material form or not.
- **Sensitive information** is a special category of personal information. Sensitive information refers to health information about an individual, genetic information about an individual that is not otherwise health information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or biometric templates.

Sensitive information includes information or an opinion about an individual's:

- Racial or ethnic origin
- Political opinions
- Membership of a political association
- Religious beliefs or affiliations
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual orientation or practices
- Criminal record, that is also personal information

### 3.0 Implementation

#### 3.1 Personal Information Collected

The type of information that the College collects and holds will depend on the nature of a person's involvement with the College.

Depending on the reason for collecting the personal information, the personal information collected by the College may include (but is not limited to):

- name
- residential address
- email address
- fax number



- phone number
- current employment information
- Medicare and private health insurance details
- superannuation fund details
- personal relationships with others
- next of kin details
- images (including digital images for internal identification purposes)
- date of birth
- bank account details
- academic results
- age
- legal documentation relating to family or domestic relationships (such as parenting plans and family court orders)
- student medical information
- English testing records
- nationality
- qualifications

A person is not required to provide the personal information and/or sensitive information requested by the College, however if a person chooses not to provide information as requested, it may not be practicable for the College to service the person's needs. For instance, it will not be possible for the College to enrol a person, provide education to a person, or employ a person, if they want to remain anonymous or use a pseudonym.

In circumstances where the College receives unsolicited personal information (meaning, personal information received where the College has taken no active steps to collect the information), the College will usually destroy or de-identify the information as soon as practicable, if it is lawful and reasonable to do so. The College may use the unsolicited personal information if it is reasonably necessary for, or directly related to, the College's functions or activities.

## 3.2 Collection Methods of Personal Information

Depending on the type of personal information, the following staff will usually be responsible for collecting personal information from a person:

- Reception/Administration staff
- Director of Marketing and Admissions
- Human Resources Manager
- Director of Instructional Programs
- Director of Business and Administration
- Finance Officers
- Integration staff
- School nurses
- Wellbeing Team members
- Learning Support Teachers
- Teachers
- Learning Inclusion and Diversity Managers
- Contracted third parties (e.g. camp staff) may also collect personal information and then be briefed on the proper use of personal information



The College will, wherever practicable, collect personal information directly from the individual including from hard copy forms, online applications and uploading of documents, face-to-face meetings, job applications, assessment reports, medical certificates, email correspondence, social media, questionnaires, and telephone calls.

The College may collect personal information from individuals such as staff members, current parents and/or guardians and students, future parents and/or guardians and students, visitors, contractors, and suppliers.

On occasion, the College may collect personal information from a third party. For example, personal information may be provided to the College by a medical professional.

The College will generally obtain consent from the owner of personal information to collect their personal information. Consent will usually be provided in writing however sometimes it may be provided orally or may be implied through a person's conduct. The College will endeavour only to ask a person for personal information that is reasonably necessary for the activities in which the person is seeking to be involved.

In relation to the collection and disclosure of sensitive information, the College is bound by the APPs, which provide for the circumstances in which disclosure is permitted or required by law.

### 3.3 Use of Collected Personal Information

The College may collect, hold, use or disclose a person's personal information for the following general purposes:

- to identify a person
- for the purpose for which the personal information was originally collected
- for a purpose for which a person has consented
- for any other purpose authorised or required by an Australian law
- for any other purpose authorised or required by a court or tribunal

More specifically, the College may collect, hold, use or disclose a person's personal information for the following purposes.

#### 3.3.1 Students and Parents/Guardians

In relation to the personal information of students and parents and/or guardians, the College's primary purpose of collecting the personal information is to enable the College to provide education to the student and fulfil its duty of care owed to the student.

The purpose for which the College uses personal information of students and parents and/or guardians include:

- providing schooling to students
- correspondence with parents and/or guardians to keep parents and/or guardians informed about matters related to their child's performance at school
- publication of newsletters and articles on our website
- day to day administration
- looking after a student's educational, social and medical wellbeing
- fulfilling its duty of care obligations
- the collection of debts owed to the College

The College may publish the contact details of parents and/or guardians in a class list and publish images of students and parents and/or guardians in publications, on social media, or in public advertisements.

If a person has any concerns about their personal information being used by the College in any of these ways, the person must notify the College.

### 3.3.2 Staff Members, Contractors and Volunteers

In relation to the personal information of prospective and current staff members, contractors and volunteers, the College uses the personal information for purposes including:

- To enable the College to carry out its recruitment functions;
- Correspond with the person, provide training and professional development;
- Fulfil the terms of any contractual relationship; and
- Ensure that the person can perform their duties to facilitate the education of the students.

The College may publish the images of staff, contractors and volunteers in publications, on social media, or in public advertisements.

If a person has any concerns about their personal information being used by the College in any of these ways, the person must notify the College.

### 3.4 Disclosure of Personal Information

The College may disclose personal information to a recipient overseas (for example where the College has outsourced a business activity to an overseas provider or a student overseas) in accordance with the Privacy Act. In such circumstances, the College will take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the information.

Otherwise, the College may disclose personal information to a recipient overseas in accordance with the Privacy Act where:

- The person has consented to the disclosure;
- The College reasonably believes that the overseas recipient is subject to a law or binding scheme that protects the information in a way that is substantially similar to the way the information is protected under the Privacy Act and the APPs; or
- The disclosure is required or authorised by an Australian law or a court order.

### 3.5 Direct Marketing

In addition to the College's essential communications about its operations, student activities and welfare, will not be regarded as direct marketing, from time to time, and in support of the College's future development and growth, the College will send information to parents, prospective parents on waitlists and other people who have consented to receive such communications.

Although the College treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to be a quality learning environment, we understand that people do not always wish to receive this information and any requests for support.

If a person does not want to direct marketing or requests for donations, the person can contact the College by email on [kardinia@kardinia.vic.edu.au](mailto:kardinia@kardinia.vic.edu.au). Once the College receives a request to "opt out" from receiving marketing information, the College will cease sending such information.

### 3.6 Storage of Personal Information

The College takes all reasonable steps to protect personal information under its control from misuse, interference and loss and from unauthorised access, modification or disclosure.

The College protects personal information in a number of ways including:

- securely storing paper records



- firewalls
- Password restricted access to computerised records;
- Routine security risk assessments; and
- Internal policies in relation to access to personal information.

### 3.7 Updating Personal Information

The College is committed to holding accurate and up-to-date personal information. To ensure the quality and accuracy of the personal information held by the College, parents and/or guardians are asked to confirm their personal details and the personal details of their child on an annual basis and prior to school camps and excursions.

A person may contact the College at any time to update their personal information held by the College. The College will destroy or de-identify any personal information that is no longer required by the College for any purpose for which the College may use or disclose it, unless the College is required by law or under an Australian law or a court order to retain it.

### 3.8 Accessing Personal Information

If a person wishes to access personal information held about themselves or about a student for which they are a parent or guardian in order to seek correction of such information, they may do so by contacting the Director of Business and Administration in writing via email (a.lovick@kardinia.vic.edu.au). In accordance with the Privacy Act, the College may refuse access to personal information in a number of circumstances, including where

- Giving access to the information would pose a serious threat to the life, health or safety of a person
- Giving access would have an unreasonable impact on the privacy of a person
- The information relates to existing or anticipated legal proceedings and would not be available under the discovery process, or denying access is required or authorised by an Australian law or court order

The College will seek to handle all requests for access to personal information as quickly as possible.

### 3.9 Complaints

Complaints about a breach of the APPs must be made in writing to the Director of Business and Administration, via email (a.lovick@kardinia.vic.edu.au). The College will investigate any complaint and will notify the complainant, in writing, of any decision in relation to the complaint as soon as practicable. Data breaches will be handled in accordance with the College's data breach response plan and notifications will be made as required by law.

If a complainant is not satisfied with the response, they can refer the complaint to the Office of the Australian Information Commissioner.

POLICY DATES			
<b>Written / updated</b>	Aug 2019	<b>Approved by Principal</b>	Aug 2019
<b>Approved by College Board</b>	Aug 2019	<b>Next Review Due</b>	Aug 2021