



Canterbury College Policy Manual

CANTERBURY
COLLEGE

1.23 Privacy Policy

Purpose:

Canterbury College (the School) is committed to protecting the privacy of its employees, students, parents, alumni and Board Members.

The School is bound by the Australian Privacy Principles (APPs) and the *Privacy Act 1988* (Cth) (the Act).

1. SCOPE

This policy applies to students, parents, Board members, employees and volunteers. This policy outlines how the School collects, uses and discloses personal information.

2. DEFINITIONS

Employee means all employees employed by the School, including applicants and prospective Employees.

Employee Record means a record as defined in the Act.

Parent is the parent / guardian / carer of a Student.

Student means prospective, current or past student of the School.

Personal information is information or an opinion, whether true or not, and whether recorded in material form or not, about an identified individual or an individual whose identity is reasonably apparent, or can be determined, from the relevant information or opinion.

Sensitive information is a type of personal information. It includes information or 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 preference or practice, or criminal record. Sensitive information also includes biometric information that is used for the purpose of automated biometric verification, biometric identification or biometric templates.

Health information is a subset of sensitive information. It is information or an opinion about the health or disability of an individual and information collected to provide, or in providing a health service.

Health service includes an activity performed to assess, record, maintain or improve an individual's health, to diagnose an illness or disability, to treat an individual, or the dispensing on prescription of a drug or medicinal preparation by a pharmacist.

Board Member is a person who has been duly elected as a Director of Canterbury College Limited in accordance with the Canterbury College Limited Memorandum and Articles of Association.

TITLE: Privacy Policy	CRICOS # 01609C	Approved/ Issued By: College Board	Issue Date: 27/03/2014
--------------------------	--------------------	---------------------------------------	---------------------------



Canterbury College Policy Manual

CANTERBURY
COLLEGE

3. PURPOSE

The School collects, holds, uses and discloses personal information so that it can exercise its function and activities and fulfil relevant duties and obligations.

That may include (but is not limited to):

- (a) informing Parents about the Student's education;
- (b) School administrative purposes, including for the provision of such services to the School;
- (c) supporting a Student's educational, social and medical wellbeing;
- (d) seeking donations and/or marketing for the School; and
- (e) satisfying the legal obligations of the School.

The School collects and holds personal information, sensitive information and health information about Students, Parents, Board Members and Employees.

The School generally deals with personal and sensitive information regarding:

- (f) students and Parents relating to the enrolment of the Student at the School;
- (g) job applicants, staff members, volunteers and contractors; and
- (h) persons who are involved with the School including Board Members.

The School collects personal information about individuals to satisfy legal obligations and to fulfil its educational purpose. If the School requests information to be provided and the request is not complied with, the School may be unable to enrol a prospective Student or continue enrolment of a current Student.

4. COLLECTION

4.1 Personal Information

The School collects personal information about an individual by way of forms, face-to-face meetings, interviews and telephone calls. Other individuals may provide personal information about a person in dealings with the School.

The School may collect personal information about an individual from a third party, for example, a medical practitioner providing a report.

Collection of personal information from a third party will be undertaken where it is reasonably necessary to do so. Any personal information that is unsolicited will be dealt with in accordance with the APPs.

TITLE: Privacy Policy	CRICOS # 01609C	Approved/ Issued By: College Board	Issue Date: 27/03/2014
--------------------------	--------------------	---------------------------------------	---------------------------



Canterbury College Policy Manual

CANTERBURY
COLLEGE

4.2 Sensitive Information

Sensitive information will be collected by the School where it is reasonably necessary for one or more of the School's functions or activities. It will only be collected with consent, unless one of the exceptions under the APPs applies.

4.3 Employee Records

Under the Act, the APPs do not apply to Employee records. This means that the Act does not apply to how the school deals with an Employee record that concerns current and former Employees of the school.

5. USE AND DISCLOSURE

The School will only use and disclose personal information for the primary purpose of collection or as otherwise specified in this Privacy Policy.

The School from time to time discloses personal and sensitive information to others for administrative, management, protection and educational purposes. This includes to other schools, government departments, the Corporation of Synod of the Diocese of Brisbane known as the Anglican Church Southern Queensland and its commissions and agencies, medical practitioners, and people providing services to the School, including specialist visiting teachers, coaches, volunteers and counsellors.

Personal information will only be used for a secondary purpose if consent has been obtained, where it is reasonably expected or if such use or disclosure falls within a permitted exception.

Sensitive information will be used and disclosed for the primary purpose of collection, unless the School is advised otherwise, or the use or disclosure is required / permitted by law.

6. QUALITY OF INFORMATION AND SECURITY

The School endeavours to ensure that the personal information it holds is accurate, complete and up to date.

The School will take all reasonable steps to:

- (a) protect personal information from misuse, interference, loss, unauthorised access, modification or unauthorised disclosure; and
- (b) destroy or de-identify information that is no longer needed.

7. ACCESS TO PERSONAL INFORMATION

Access to records of personal information that the School holds or concerns about the accuracy of information held by the School should be directed to Head of College at the School.

Parents may seek access to personal information held by the School about them or their child. There will be occasions when access is denied. Such occasions would include where release of the

TITLE: Privacy Policy	CRICOS # 01609C	Approved/ Issued By: College Board	Issue Date: 27/03/2014
--------------------------	--------------------	---------------------------------------	---------------------------



Canterbury College Policy Manual

CANTERBURY
COLLEGE

information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the School's duty of care to the pupil or where pupils have provided information in confidence.

To make a request to access personal information the School requires a request in writing. The School will respond to this request within a reasonable period of time. Where it is reasonable, the School will provide access in the manner requested. The School may charge a fee to provide access to the personal information, however, will not charge for the request for access.

If a request for access is refused the School will provide written reasons on why the request was refused; details on how to make a complaint will also be included in this response.

8. COLLEGE FILES

College Files contain many and varied pieces of information in relation to the enrolled student. Such files are considered confidential records. Confidential College Files are the property of Canterbury College and request for access to such Confidential College Files is dealt with at the College's discretion. This does not preclude your right to access of personal information.

9. OVERSEAS DISCLOSURE AND CLOUD

The School may disclose personal information about an individual overseas; this is likely to occur if the School uses "cloud" service providers.

When disclosing personal information the School will take all steps reasonable to ensure that the overseas recipient complies with the APPs.

10. MARKETING AND FUNDRAISING

The School engages in marketing and fundraising as a means to promote future growth and sustain and improve the educational environment for Students.

Personal information collected may be used to make a marketing or fundraising appeal. The School will abide by any direction from an individual not to disclose personal information to third parties for marketing purposes.

The School also allows individuals to "opt out" through selection on the Standard Collection Notice, or on the enrolment agreement.

11. COMPLAINTS

If an individual believes that the School has breached the APPs a complaint can be made to the School.

All complaints should be in writing and directed to the Head of College. The School will investigate complaints in a timely manner and respond in writing.

If an individual is not satisfied with the School's response, a complaint can be lodged with the Office of the Australian Information Commissioner on the following website
<http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

TITLE: Privacy Policy	CRICOS # 01609C	Approved/ Issued By: College Board	Issue Date: 27/03/2014
--------------------------	--------------------	---------------------------------------	---------------------------



Canterbury College Policy Manual

CANTERBURY
COLLEGE

12. Guidelines/Procedure/Process

12.1. Responsibilities

The Head of College is responsible for ensuring adherence to the Privacy Policy, the Australian Privacy Principles (APPs) and the *Privacy Act 1988* (Cth) (the Act).

12.2. Procedure

Nil

12.3. Record Keeping.

Nil

13. Standard of Services

Nil

14. Related Policies, Procedures and Guidelines

Form Standard Collection Notice
Form Employment Collection Notice
Form Coach, Volunteer, Contractor Collection Notice

TITLE: Privacy Policy	CRICOS # 01609C	Approved/ Issued By: College Board	Issue Date: 27/03/2014
--------------------------	--------------------	---------------------------------------	---------------------------