



## Privacy Policy

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### Culture

John Paul College is a Christian, ecumenical, co-educational College. Our values are based on a Christian ethos and particularly emphasise the principles of Mutual Respect, Acceptance, Freedom, Truthfulness and Fairness. There is an expectation that all members of the College Community uphold these values and the associated practices, particularly as they apply to respecting the privacy and confidentiality of those with whom they come in contact.

### Introduction

The College is bound by the Privacy Act 1998, Commonwealth, the Privacy Amendment (Enhancing Privacy Protection) Act, 2012, and the Australian Privacy Principles 2014.

Information is collected for the **primary purpose** of providing an education for your student. The College endeavours to collect the information reasonably and non-intrusively. Full and frank disclosure is required.

The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Colleges' operations and practices and to make sure it remains appropriate to the changing College environment.

### Purpose

- a) This Policy outlines the Board's and the College's commitment to protecting the privacy of personal information that is collected by us provided to the College.
- b) The **primary purpose** for which the College uses personal information (initially and on-going) is to assess and respond to the educational needs of students.
- c) **The secondary purposes** related to the Primary Purpose include:
  - To keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
  - Day-to-day administration;
  - Looking after pupils' social and medical wellbeing;
  - Fee payment
  - Assessing hardship requests
  - seeking donations and marketing for the College;
  - To satisfy the College's legal obligations and allow the College to discharge its duty of care.

**Full and frank disclosure is a fundamental requirement without which the initial and/or ongoing enrolment of the student may be compromised.**

- d) **From Job applicants, staff members and contractors:** In relation to personal information of job applicants, staff members and contractors, the College'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 purposes for which the College 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;
- Seeking funds and marketing for the College;
- To satisfy the College's legal obligations, for example, in relation to Child Protection legislation.

**Exception in relation to employee records:** Under the Privacy Act the Australian Privacy Principles do protect information about an employee record.

- e) **From Volunteers:** The College also obtains personal information 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.

## Definitions

**Personal Information** – The Act defines personal information as identifiable information including the individual's name, signature, address, telephone number, email, date of birth, and credit history.

**Sensitive Information** – is a type of personal information and includes information about:

- An individual's racial and ethnic origin,
- Health information, religious beliefs or afflictions, philosophical beliefs, marital status,
- Criminal record

## What kind of personal information does the College collect and how does the College collect it?

- a) The type of information the College collects and holds includes (but is not limited to) personal information, including sensitive information, about:
- Students and parents and/or guardians ('Parents') 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.
- b) Unsolicited information provided to the College by third parties will be destroyed unless legal obligations necessitate otherwise. The College may also collect "unsolicited information" by way of video surveillance which assists the College with security and student protection matters. The surveillance cameras are installed at strategic locations around the campus. All video footages are stored and managed privately by the assigned authorities and accessible for investigation purposes only in the event of an incident. These footages may be released to enforcement agencies if required, subject to compliance with the Australian Privacy Principles. The footages will be deleted or de-identified regularly to comply with Australian Privacy Principle 4.
- c) In some circumstances, the College 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 College. If the College should require additional personal or sensitive information of the individual from a third party, an authorised consent (i.e. via the parents or guardian) will be obtained.

**Personal Information you provide:** The College will generally collect personal information by way of Forms filled out by Parents or pupils (including on-line), face-to-face meetings and interviews, and telephone calls.

## Use of Information

- a) College-based publications:
  - College publications, such as newsletter and magazines which include personal information will be provided to the College community.
- b) Marketing and fundraising:
  - The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to be a quality learning environment in which both pupils and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising, for example, the alumni organisation.
- c) Images and names of students will not be used for marketing purposes **without the express consent** of parents.

## Disclosure of Information

The College will disclose information where:

- a) the person consents to disclosure, and
- b) may disclose personal information, including sensitive information, held about an individual to:
  - Another College;
  - Government departments;
  - Medical practitioners;
  - Public Health, Safety or Police Authorities, including as mandated by law,
  - People providing services to the College, including specialist visiting teachers and sports coaches;
  - Law Enforcement Authorities;
  - Recipients of College publications, like newsletters and magazines;
  - Parents; and
  - Anyone you authorise the College to disclose information to.

### Disclosure Sending information overseas

The College may disclose personal information about a person to overseas recipients, for instance to allow storing information with "cloud" service providers which are situated outside Australia, or to facilitate a College student exchange. However the College 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 being reasonably satisfied that the recipient is subject to a law binding contract which complies with or substantially reflects the Australia Privacy Principles.

### Disclosure of sensitive information

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

## Management and security of personal information

The College staff are required to respect the confidentiality of staff personal information, pupils' and parents' personal information. Any wilful misappropriation of private information will be investigated and the person(s) will be subject to the Principal's conduct review and if necessary referred to the appropriate authorities.

The College has in place steps to protect the personal information the College holds from misuse, 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. Security measures may include

password locked cabinets, key locked drawers and security password access for digitally stored information within the College mainframe.

## **Data Quality - Updating & Correction of Personal Information**

The College will take steps to ensure that the personal information it holds is accurate, complete and up-to-date. However as a matter of contractual partnership the College will expect parents to update personal information in the best interests of catering for the needs of their children. A person may seek to update their personal information held by the College by contacting the College Office.

The Australia Privacy Principles require the College not to store personal information longer than necessary and to take necessary steps to de-identify personal information no longer needed for any expressed purpose.

## **Access to Information**

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. Exceptions apply where the privacy of other legislative obligations or the College's duty of care may be compromised. Pupils will generally have access to their personal information through their parents, but older pupils may seek access themselves.

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

You will need to verify your identity and specify what information you require. The College 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, the College will advise the likely cost in advance.

## **Consent and rights of access to the personal information of pupils**

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

Generally, the College will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. The College will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

## **Making a Complaint**

### **a) Internal Complaint**

Should you wish to make a Complaint please provide the request and details, in writing, to the Principal. It is recommended that concerns are first discussed at "College level" stating the details of your concerns and the remedy you seek.

### **b) External Complaint**

You have a right to bring a Complaint to the Privacy Commissioner. The Complaint process is free of charge. Forms are available on the Australian Government Business Account Portal. Under the *Privacy Act 1988* (Privacy Act) you can make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information by Australian, ACT and Norfolk Island government agencies and private sector organisations covered by the Privacy Act.

## Overseas Students

The College collects personal information about Overseas Students as part of the processes of recruitment, application, admission and enrolment. This information is collected to comply with the College's obligations under Australian laws (such as Education Services for Overseas Students Act 2000 and National Code of Practice for Providers of Education and Training to Overseas Students).

The College may record, use and disclose personal information Overseas Students provide in connection with the enrolment and international student programs so that the College can administer agreements related to the enrolment, the provision of courses, discharge our duty of care to them and comply with Australian laws.

The College may record, use and disclose Overseas Student personal information for the purposes of registering with the Queensland Curriculum and Assessment Authority and opening a student account.

For Overseas Students living with a Homestay Provider, the College will record, use and disclose personal information for the purpose of approving and monitoring accommodation, support and general welfare for the duration of the homestay arrangement and there will be an ongoing exchange of Overseas Student personal information between the Homestay Provider and the College, including through secure online services such as JPCconnect/SEQTA.

If an Overseas Student nominates an education agent on an application for enrolment to the College, the College may disclose personal information to the agent, unless the Overseas Student notifies the College in writing not to do so.

The College may disclose Overseas Student personal information to Commonwealth Government agencies including the Tuition Protection Scheme, agencies responsible for administering migration or education services, Overseas Student Health Cover (OHSC) providers (if we are arranging OSHC for the student) and Homestay Providers. The College may also disclose Overseas Student personal information where authorised or required by law.

## Review

This Policy will be reviewed and updated in accordance to changes in legislative requirement and appropriateness to the College environment.

Document Information		
File Name: Privacy Policy		
File Location: Compliance Policy		
Document History		
Date	Summary of Changes	Reviewer
24/8/2018	Addition of Culture paragraph	Deputy Principal
16/7/2020	Addition of Overseas Students	HIO / DHIO