



**Heatherton  
Christian College**

# Privacy Policy

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## **Rationale**

This Privacy Policy sets out how Heatherton Christian College (“the College”) manages personal information provided to or collected by it.

The College is bound by the Australian Privacy Principles (“APP”) contained in the Commonwealth Privacy Act 1988 and will collect, use and retain personal information, including any sensitive information, in accordance with those Principles. In relation to health records, the College is also bound by the Health Records Act 2001 (Vic).

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

## **Collection of Information**

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

- Students and parents/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.

### *Personal Information you provide*

The College 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 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 school.

### *Exception in relation to employee records*

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the College’s treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee. The College handles staff health records in accordance with the Health Privacy Principles in the Health Records Act.

## **Use of Personal Information**

The College will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

### *Students and Parents*

In relation to personal information of students and Parents, the College’s primary purpose of collection is to enable the College to provide schooling to students enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College. This includes satisfying the needs of Parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

The purposes for which the College uses personal information of students and Parents include:

- To keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- Day-to-day administration of the College;
- Looking after students' educational, social and medical wellbeing;
- Seeking donations and marketing for the College; and
- To satisfy the College's legal obligations and allow the College to discharge its duty of care.

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

#### *Job Applicants and Contractors*

In relation to personal information of job applicants and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be.

The purposes for which the College uses personal information of job applicants and contractors include:

- Administering the individual's employment or contract, as the case may be;
- For insurance purposes;
- Seeking donations and marketing for the College; and
- Satisfying the College's legal obligations, for example, in relation to child protection legislation.

#### *Volunteers*

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities to enable the College and the volunteers to work together.

#### *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 provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the PFA or alumni organisation or on occasions, external fundraising organisations.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information.

College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

#### **Disclosure and Storage of Personal Information**

The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- Another school or educational organisation, as required;

- Government departments;
- Medical practitioners;
- People providing educational, support and health services to the College, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools;
- Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- People providing administrative and financial services to the College;
- Recipients of College publications, such as newsletters and magazines;
- Students' parents or guardians;
- Anyone you authorise the College to disclose information to; and
- Anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

### **Sending and storing Information Overseas**

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school 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 complying with the Australian Privacy Principles or other applicable privacy legislation.

The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. College personnel and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.

### **Treatment of Sensitive Information**

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

## **Management and Security of Personal Information**

The College's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information the College holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

## **Access and Correction of Personal Information**

Under the Commonwealth Privacy Act and the Health Privacy Principles contained in *the Health Records Act 2001* (Vic), an individual has the right to seek and obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or to update any personal information the College holds about you or your child, please contact the College Head of Campus or Business Manager by telephone or in writing. The College may require you 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. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

## **Consent and Rights of Access to the Personal Information of Students**

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 student to the student's Parents. The College 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.

Parents may seek access to personal information held by the College about them or their child by contacting the College Head of Campus or Business Manager by telephone or in writing. However, there may be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the College's duty of care to the student.

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

## **Information Collected From Our Website**

We may collect information based on how individuals use our website through the use of "cookies" and other data collection methods. The College does not collect or solicit any personal information through its website that might be unlawful, unnecessary, excessive or unrelated to the functions or activities of the College.



### *Record of Your Visit*

When you visit the College website, a record is generated about your visit which may be used for statistical gathering and analytical purposes. The information collected from our website is not used to personally identify individuals.

### *Use of Cookies*

The College may use cookies to store information that may speed up your use of our website for any of your future visits to the website. We may also use cookies to help manage the display and presentation of information on the website. Cookies are stored on your computer and not on our website.

The information we collect through cookies is anonymous and not personally identifiable and may be used for statistical and business purposes. Cookies do not contain your name, address, telephone number, email address or other personal information.

### *Disclosure About Collection of Data*

Third parties, including Facebook, may use cookies, web beacons and other storage technologies to collect or receive information from our website and elsewhere on the Internet, and use that information to provide measurement services and target advertisements. You can opt out of this collection by visiting sites such as or go to:

<http://www.youronlinechoices.com.au/>

<https://adssettings.google.com/>

You can find more information on the OAIC website.

### **Surveillance Technologies**

The College uses surveillance technologies in and around school premises as part of their security systems and safety procedures to ensure the College provides a Child Safe environment for students, staff and visitors and reasonably protect the College against risks of intruders, vandalism and unauthorised student exits. Signs are affixed in a number of suitable places to identify these safety procedures are in place for the benefit of the whole College community.

### **Information Sharing Schemes**

The Victorian government is progressing 3 interrelated reforms that are integral to reducing family violence and promoting child wellbeing or safety.

The Family Violence Information Sharing Scheme (FVIS), the Child Information Sharing Scheme (CISS) and the Family Violence Multi-Agency Risk Assessment and Management Framework (MARAM) have been developed in response to several coronial inquests and independent inquiries.

The Family Violence and Child Information Sharing Schemes came in to effect in September 2018 and are aimed at removing barriers to information sharing to allow professionals to work together, across the service system, to make more informed decisions and better respond to the needs of children, families and other people, including those experiencing family violence.

The two information sharing schemes allow prescribed organisations and services to share information in addition to existing information sharing permissions available to them. MARAM will guide information sharing under both information sharing schemes wherever family violence is present.

Together, these reforms create a more collaborative, integrated system that will help improve safety and wellbeing outcomes for all Victorian children and families, including victims of family violence.

From Term 2 2021, the CISS will apply to all Victorian schools and early childhood education and care services. Heatherton Christian College falls under the requirements and obligations under the schemes and the sharing of information is guided by appropriate frameworks. Schools can share confidential information which meets all of the threshold requirements.

For additional information about the information sharing schemes, please refer to:

- Child Information Sharing Scheme (CISS):  
<https://www.vic.gov.au/child-information-sharing-scheme>
- Family Violence Information Sharing Scheme (FVIS):  
<https://www.vic.gov.au/family-violence-information-sharing-scheme>
- Family Violence Multi-Agency Risk Assessment and Management Framework (MARAM):  
<https://www.vic.gov.au/family-violence-multi-agency-risk-assessment-and-management>

Requests for information from prescribed Information Sharing Entities related to the Child Information Sharing Scheme (CISS) or Family Violence Information Sharing Scheme (FVISS) should be made in writing to [studentwellbeing@ncc.vic.edu.au](mailto:studentwellbeing@ncc.vic.edu.au) where practicable.

### **Responding to Data Breaches**

The Notifiable Data Breach Scheme (NDBS) requires Heatherton Christian College to notify individuals when their personal information is involved in a data breach that is likely to result in serious harm. The College has in place a Data Breach Policy and will take appropriate, prompt action if it has reasonable grounds to believe that a serious data breach has occurred. This may involve review of the College's internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If the College is unable to notify affected individuals or when it is impractical to do so, the College will publish a statement on its website.

### **Enquiries and Complaints**

If you would like further information about the way the College manages the personal information it holds, or wish to complain based on a belief that the College has breached the Australian Privacy Principles please contact the College Head of Campus by writing or telephone at (03) 8551 6650. The College will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

### **Evaluation**

This policy will be reviewed as part of the school's three-year review cycle.

### **Related Policies**

Data Breach Policy

### **Related Legislation**

Child Wellbeing and Safety Act 2005 (Vic)  
Freedom of Information Act

Health Records Act 2001 (Vic) National Privacy Principles Privacy Act 1988  
Surveillance Devices Act 1999 (Vic)

### **References**

Independent Schools Council of Australia and National Catholic Education Commission. (2016, August). *Privacy Compliance Manual*. Retrieved from <http://isca.edu.au/wp-content/uploads/2016/08/Privacy-Compliance-Manual-August-2016.pdf>

Independent Schools Council of Australia and National Catholic Education Commission. (2017, August). *Privacy Compliance Manual*. Retrieved from <http://isca.edu.au/wp-content/uploads/2017/08/c1111-Privacy-Compliance-Manual-Updates-August-2017.pdf>



## Standard Collection Notice

1. Heatherton Christian College ("the College") collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to provide schooling to the student and to enable them to take part in all the activities of the College.
2. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act 1988. We may ask you to provide medical reports about students from time to time.
5. The College from time to time discloses personal and sensitive information to others for administrative and educational purposes, including to facilitate the transfer of a student to another school. This includes to other schools, government departments, medical practitioners, and people providing services to the College, including specialist visiting teachers, sports coaches, volunteers, and counsellors.
6. Personal information collected from students is regularly disclosed to their parents or guardians.
7. The College may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. The College's Privacy Policy sets out how parents or students may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the student, or where students have provided information in confidence.
9. The College Privacy Policy also sets out how you may complain about a breach of privacy and how the College will deal with such a complaint.
10. As you may know the College 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 the College'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. On occasions, information such as academic and sporting achievements, student activities and similar news is published in the College Newsletter, College magazines, the College's social media (Facebook, Instagram, LinkedIn) pages and on our website. Photographs of student activities such as sporting events, school camps and school excursions may be taken for publication in College newsletters, magazines, Facebook page and on our website. The College will obtain separate permissions from the students' parent or guardian prior to publication.
12. The College may include students' and students' parents' contact details in a class list to enable us to provide the services offered. If you do not agree to this, you must advise the College now.
13. If you provide the College 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 the College and why, that they can access that information if they wish, and that the College does not usually disclose this information to third parties.
14. The College uses surveillance technologies in and around school premises as part of their security systems and safety procedures to ensure the College provides a Child Safe environment for students, staff and visitors and reasonably protect the College against risks of intruders, vandalism and unauthorised student exits. Signs are affixed in a number of suitable places to identify these safety procedures are in place for the benefit of the whole College community.

### Acknowledgement and Consent

By signing this Acknowledgement and Consent you are agreeing to the collection and storage of personal information by the College, as described above. Please note that a full copy of the College's Privacy Policy is available on request.

Parent 1 / Guardian 1 Name: .....

Parent 1 / Guardian 1 Signature: ..... Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Parent 2 / Guardian 2 Name: .....

Parent 2 / Guardian 2 Signature: ..... Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

## Employment Collection Notice

1. In applying for this position, you will be providing Heatherton Christian College (“the College”) with personal information. We can be contacted by mail at 316-322 Kingston Rd, Clarinda VIC 3169, or by e-mail at [office@hcc.vic.edu.au](mailto:office@hcc.vic.edu.au), or by telephone on (03) 8551 6650.
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 College'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. You may be required to provide the College with a criminal record check and a Working With Children Check. The College may also be required to collect personal information about you in accordance with Child Protection and other relevant laws.
6. The College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.

### Acknowledgement and Consent

By signing this Acknowledgement and Consent you are agreeing to the collection and storage of personal information by the College, as described above. Please note that a full copy of the College's Privacy Policy is available on request.

Applicant Name: .....

Applicant Signature: ..... Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

## Contractor / Volunteer Collection Notice

1. In applying to provide services to Heatherton Christian College ("the College"), you will be providing the College with personal information. We can be contacted by mail at 316-322 Kingston Rd, Clarinda VIC 3169, or by e-mail at [office@hcc.vic.edu.au](mailto:office@hcc.vic.edu.au), or by telephone on (03) 8551 6650.
2. If you provide the College 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. 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 12 months (from the date of collection).
4. The College'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. You may be required to provide the College with a criminal record check and a Working With Children Check. The College may also be required to collect personal information about you in accordance with Child Protection and other relevant laws
7. The College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
8. If you provide the College with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish, and that the College does not usually disclose the information to third parties.

### Acknowledgement and Consent

By signing this Acknowledgement and Consent you are agreeing to the collection and storage of personal information by the College, as described above. Please note that a full copy of the College's Privacy Policy is available on request.

Name of Signatory: .....

Signature of Contractor / Volunteer: ..... Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Print Name of Contractor: .....  
(if not an individual)

## Past Students Association Collection Notice

1. The Past Students Association (“the Association”) may collect personal information about you from time to time. The primary purpose of collecting this information is to enable the Association to inform you about our activities and the activities of Heatherton Christian College (“the College”) and to keep the Association’s members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the Association.
3. From time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the College to assist in its fundraising activities. If you do not agree to this, please advise us now.
4. The Association may publish details about you in our publications and the College's website. If you do not agree to this you must advise us now.
5. The College's Privacy Policy contains details of how you may seek access to personal information collected about you or how you may complain about a breach of the Australian Privacy Principles.
6. The College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
7. If you provide personal information to us about other people, we encourage you to inform them of the above matters.

### Acknowledgement and Consent

By signing this Acknowledgement and Consent you are agreeing to the collection and storage of personal information by the Association, as described above. Please note that a full copy of the College’s Privacy Policy is available on request.

Print Name: .....

Signature: ..... Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_