



## Rationale

Hope Christian College (College) is bound by the *Australian Privacy Principles* contained in the *Commonwealth Privacy Act 1988*. The College may update this 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. This policy sets out how the College manages personal information provided to or collected by it.

## Definitions

**at/to the College** – this refers to being on the College grounds, but also to being present at College activities such as excursions, on or off site, and special days (e.g. Sports Days)

**College community** – this includes but may not be limited to: students, parents of students, immediate family of students, authorised volunteers, authorised visiting speakers and guests, staff (whether temporary, contracted or permanent), staff spouses and dependent children (who are not staff or family), College leadership, OSHC and CCC staff and leadership who are connected in some way to the College (e.g. not unconnected church attendees)

**College leadership** – includes Principal and principal's advisors

**Head of School** – refers to an appropriate Senior line manager or Coordinator

**parent** – includes caregivers and guardians, or responsible person as listed on the enrolment form

**staff** – refers to the student's class teacher or a paid Hope Christian College staff member who is responsible for supervising the student during College hours or activities

**student** – any student enrolled at Hope Christian College through a contract with their parent/guardian(s), regardless of their age

## 1. What personal information does the College collect and how is it collected?

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

**1.1 Students and parents** before, during and after the course of a student's enrolment at the College, including:

- name, contact details (including next of kin), date of birth, gender, language background, previous College and religion
- parents' education, occupation and language background
- medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors)
- conduct and complaint records, or other behaviour notes, and College reports
- information about referrals to government welfare agencies
- counselling reports
- health fund details and *Medicare* number
- court orders
- volunteering information
- photos and videos at College events.

**1.2 Job applicants, staff members, volunteers and contractors**, including but not limited to:

- name, contact details (including next of kin), date of birth, and religion



- information on job application
- professional development history
- salary and payment information, including superannuation details
- medical information (e.g. details of disability and/or allergies, and medical certificates)
- complaint records and investigation reports
- leave details
- photos and videos at College events
- workplace surveillance information
- work, and private emails (when using work email address) and Internet browsing history.

**1.3 Other people** who come into contact with the College, including name and contact details and any other information necessary for the particular contact with the College.

## **2. 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.

### **2.1 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 College.

### **2.2 Exception in Relation to Employee Records**

Under the *Privacy Act*, the *Australian Privacy Principles* do not apply to an employee record. As a result, the *HCC Privacy Policy* (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.

## **3. How will the College use the personal information you provide?**

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.

### **3.1 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
- marketing and seeking donations for the College
- 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 students or permit the students to take part in a particular activity.

### **3.2 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 appropriate 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
- marketing and seeking donations for the College
- satisfying the College's legal obligations, for example, in relation to Child Protection legislation.

### **3.3 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.

### **3.4 Marketing and Fundraising**

The College treats marketing and seeking donations for (but not limited to) the future growth and development of the College or the pursuit of activities such as College Mission trips 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 School's fundraising, for example, the College's alumni or Missions organisations.

Parents, staff, contractors and other members of the wider College community may receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

## **4. Who might the College disclose personal information to and store your information with?**

The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include, but is not limited to:

- other colleges and teachers at those colleges
- government departments (including for policy and funding purposes)
- medical practitioners
- people providing educational, support and health services to the College, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors
- providers of learning and assessment tools, and educational authorities, including the *Australian Curriculum, Assessment and Reporting Authority (ACARA)* and *NAPLAN Test Administration Authorities* (who disclose to the entity managing 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
- anyone to whom we are required or authorised to disclose the information to by law, including *Child Protection* laws.

#### **4.1 Sending and Storing Information Overseas**

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a College 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)
- 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 *G-suite* including Gmail, *Google Drive* and *Google Docs*, 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 *G-suite* and ensuring its proper use.

### **5. How does the College treat 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.

### **6. 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.



## 7. Access and correction of personal information

Under the *Commonwealth Privacy Act*, an individual has the right to seek and obtain access to 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 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.

## 8. 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 students 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 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.

## 9. Enquiries and complaints

If you would like further information about the way the College manages the personal information, it holds or wish to complain that you believe that the College has breached the *Australian Privacy Principles* please contact the College by writing or telephone. 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. General enquiries can be emailed to: [admin@hopecc.sa.edu.au](mailto:admin@hopecc.sa.edu.au)

### Other relevant policies and documents:

- HCC Duty of Care
- Commonwealth Privacy Act 1988
- Australian Privacy Principles

### Version history

Previous versions: December 2018, July 2021, October 2021



### **Review**

The policy will be reviewed every two years. The review will be conducted by relevant staff and leadership of the College, with advice from the Association of Independent Schools of South Australia (AISSA) and any other relevant bodies, codes and regulations.



### ***Policy Appendix 1: Information Collection Notice***

1. Hope Christian College (College) collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a pupil'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 pupils enrolled at the College, exercise its *Duty of Care*, and perform necessary associated administrative activities, which will enable pupils 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 College require certain information to be collected and disclosed. These include relevant *Education Acts*, and *Public Health* and *Child Protection* laws.
4. Health information about pupils is sensitive information within the terms of the *Australian Privacy Principles (APPs)* under the *Privacy Act 1988*. We may ask you to provide medical reports about pupils from time to time.
5. The College may disclose personal and sensitive information for educational, administrative and support purposes. This may include to:
  - other colleges and teachers at those colleges
  - government departments (including for policy and funding purposes)
  - other related church agencies/entities (such as Craigmore Christian Church)
  - medical practitioners
  - people providing educational, support and health services to the College, including specialist visiting teachers, coaches (sports), volunteers, and counsellors
  - 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
  - anyone you authorise the College to disclose information to
  - anyone to whom the College is required or authorised to disclose the information to by law, including *Child Protection* laws.
6. Personal information collected from pupils is regularly disclosed to their parents or guardians.
7. 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 reside on a *cloud* service provider's servers which may be situated outside Australia. Further information about the College's use of on online or *cloud* service providers is contained in the Policy.
8. The Policy, accessible on the College's website, sets out how parents or pupils may seek





access to and correction of their personal information, which the College has collected and holds. However, access may be refused in certain circumstances such as 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 pupil, or where pupils have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.

9. The Policy also sets out how parents and pupils can make a complaint about a breach of the *APPs* and how the complaint will be handled.
10. The College may engage in fundraising activities, chiefly around, but not limited to Missions 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, pupil activities and similar news is published in College newsletters and magazines, on our intranet and on our website. This may include photographs and videos of pupil activities such as sporting events, College camps and College excursions. The College will obtain permissions from the pupil's parent or guardian if we would like to include such photographs or videos in our promotional material or otherwise make this material available to the public such as on the internet. In most cases consent has been provide through the enrolment process.
12. We may include pupils' and pupils' parents' contact details in a class list.
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.