



## Privacy Policy

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### Scope

The College will collect information from students (past and current), parents and/or guardians (past and current), job applicants, staff members, volunteers and contractors (all past and current) and other people who come into contact with the School.

### Purpose

The purpose of this policy is to detail how the College protects one's privacy and how the school complies with the requirements of the *Privacy Act* and the 13 Australian Privacy Principles (APP) and the *Health Records and Information Privacy Act 2002*.

The document outlines The Geelong College's policy on how it uses and manages personal information provided to or collected by it.

The policy also describes:

- The Collection Statement
  - who information is collected from;
  - how this information is collected and held;
  - the types of personal information collected;
- the purposes for which personal information is collected, held, used and disclosed;
- the management and security of personal information;
- how one can gain access to personal information;
- how a complaint or inquiry will be handled.

### Collection Statement

#### *How the information is collected*

Where possible attempts have been made to standardise the collection of personal information by using specifically designed forms (eg an Enrolment Form). However, given the nature of operations, personal information is often received by email, letters, notes, over the telephone, in face to face meetings, through financial transactions and through surveillance activities such as the email monitoring.

The College may also collect personal information from other people (eg a personal reference) or independent sources (eg telephone directory), however will only do so where it is not reasonable and practical to collect the information directly.

Sometimes the College may be provided with personal information without having sought it through normal means of collection. This is referred to as "unsolicited information". Where unsolicited information is collected, it will only be held, used and/or disclosed if the College could otherwise do so

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had it been collected by normal means. If that unsolicited information could not have been collected by normal means then it will be destroyed, permanently deleted or de-identified as appropriate.

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 record is directly related to a current or former employee of the College.

*What types (or kind) of personal information is collected*

The types of personal information collected is largely dependent upon whose information is being collected and why but in general terms:

- **Personal Information** including names, addresses and other contact details; dates of birth, next of kin details; financial information, photographic images and attendance records.
- **Sensitive Information** (particularly in relation to a student and parent records) including religious beliefs, government identifiers, nationality, country of birth, languages spoken at the home, professional memberships, family court orders and criminal records.
- **Health Information** (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.

**How & why personal information is used?**

In relation to personal information of students and parents, the primary purpose of collection is to enable the College to provide schooling and a duty of care for the student.

The primary uses of personal information include but are not limited to:

- providing education, pastoral care, extra-curricular and health services;
- satisfying the legal obligations including duty of care and child protection obligations;
- keeping parents informed as to the College community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;
- supporting the activities of School Associations and distribution of parent's contact details on a class contact list;
- supporting the activities of the College Foundation;
- supporting the activities of the Old Geelong Collegians' Association;
- supporting community based causes and activities, charities and other causes in connection with the College's functions or activities;
- helping improve the day to day operations including staff training; systems development; developing new programs and services; undertaking planning; research and statistical analysis;
- school administration, including for insurance purposes;
- the employment of staff;
- the engagement of volunteers.

In some cases where the College requests personal information about a student or parent, if the information requested is not obtained, the College may not be able to enroll or continue the enrolment of the student or allow the student to participate in the related activity.

Approved by Executive: February 2016

Reviewed: March 2018

Review Date: March 2019

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The College treats marketing and seeking donations for future growth and development as an important part of ensuring a quality-learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to an organisation solely for the purposes of fundraising activities.

*Disclosure of Personal Information*

The College will only use personal information for the purposes for which it was given, or for the purposes which are related (or directly related in the case of sensitive information) to one or more of the functions or activities. The College may disclose personal information to government agencies, other parents, other schools, recipients of school publications, visiting teachers, counsellors, coaches, service providers, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- consent has been received;
- it would be reasonably expected by us to use or disclose the personal information in this way;
- the College are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation or permitted health situation exception applies;
- disclosure is reasonably necessary for a law enforcement related activity.

*Disclosure of personal information to overseas recipients*

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or when organising an overseas excursion. 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 may be implied)
- Satisfying ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar regime
- Appropriate action is taken in relation to suspected unlawful activity or serious misconduct.

The College may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

**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 by use of various methods including locked storage of paper records and pass worded access rights to computerised records.

The College stores personal information in a variety of formats including on database, in hard copy files and on personal devices including laptop computers, mobile phones and other recording devices.

The security of personal information is of importance to the College and all reasonable steps will be taken to protect the personal information held from misuses, loss, unauthorised access, modification or disclosure.

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These steps include:

- Restricting access to information on the College database on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- Implementing physical security measures around the College buildings and grounds to prevent break-ins.
- Implementing human resources policies and procedures, designed to protect personal information storage on our computer networks.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Personal information held that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

The College website may contain links to other websites. Personal information will not be shared with those websites and the College is not responsible for their privacy practices. Please check their privacy policies as required.

For more information on how the College manages personal information it holds, please contact the Business Manager:

Shannyn Leach  
The Geelong College  
Davey House  
150 Noble Street  
Geelong VIC 3220

Tel: +61 3 5226 3102

Email: [shannyn.leach@geelongcollege.vic.edu.au](mailto:shannyn.leach@geelongcollege.vic.edu.au)

**Access to Personal Information**

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information that the College holds about them and to seek correction of any inaccuracy. There are some circumstances where access may be denied. Such circumstances 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 a student.

To make a request to access any information the College holds, please contact the Principal/Head of School in writing.

*Updating Personal Information*

The College endeavors to ensure that the personal information it holds is accurate, complete and up-to-date. A person may update their personal information held at the College by contacting the College's Database Coordinator:

Approved by Executive: February 2016

Reviewed: March 2018

Review Date: March 2019

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The Geelong College Database Coordinator  
PO Box 5  
Geelong VIC 3220

Tel: +61 3 5226 3156

Email: [tracey.bromley@geelongcollege.vic.edu.au](mailto:tracey.bromley@geelongcollege.vic.edu.au)

**Privacy Complaints**

If you wish to make a complaint about a breach by the College of the Australian Privacy Principles or the Health Privacy Principles one may do so by providing a written complaint by email, letter or by personal delivery to the Business Manager.

A complaint may also be taken to the Office of the Australian Information Commissioner.

**How to Contact**

Business Manager  
The Geelong College  
Davey House  
150 Noble Street  
Geelong VIC 3220

Tel: +61 3 5226 3102

Email: [shannyn.leach@geelongcollege.vic.edu.au](mailto:shannyn.leach@geelongcollege.vic.edu.au)

**Changes to the College privacy and information handling practices**

The Privacy Policy is subject to change at any time to take into account new laws and technology, changes to the College's operations and practices.