



Privacy Policy

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RATIONALE

The College seeks to create a caring environment where Christian values inspire and affirm the highest standards of ethical conduct in relation to the care, support, and wellbeing of students, College families, caregivers and staff.

At Belmont Christian College we choose to behave in a way that brings glory to God and is compliant with the laws of our country. The College expects its community members to be caring and compassionate showing love and consideration to our families by keeping what is important to them as safe as possible. Being compliant with the Australian Privacy Principles is a legal requirement that corresponds with our desire to show love in a practical and thoughtful manner that honours God.

“Obey your earthly masters in everything; and do it not only when their eye is on you and to curry their favour, but with sincerity of heart and reverence for the Lord. Whatever you do, work at it with all your heart, as working for the Lord, not for human masters...” Colossians 3: 22-23

“Serve one another humbly in love. For the entire law is fulfilled in keeping this one command; “Love your neighbour as yourself.” Galatians 5: 13-14

YOUR PRIVACY IS IMPORTANT

This policy has been developed to ensure that personal information is managed openly and transparently, it also outlines the use and management of personal information provided.

The College is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988, amended 12th March 2014.

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

DEFINITION OF PERSONAL INFORMATION

Information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) Whether the information is true or not; and
- (b) Whether the information or opinion is recorded in a material form or not

WHAT KIND OF PERSONAL INFORMATION DOES THE COLLEGE COLLECT AND HOW DOES THE COLLEGE COLLECT IT?

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

- Pupils and parents and/or caregivers before, during and after the course of a pupil'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 pupils, face-to-face meetings and interviews, emails and telephone calls. On occasions, people other than parents/caregivers and pupils provide personal information. Any information that may be an Australian Government identifier will not be adopted as an identifier within the College context eg Medicare numbers.

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.

Personal Information collected without consent: Sensitive information about an individual (deemed to be personal information) may only be collected with the individual's consent or if an exclusion applies and only collected if it is reasonably necessary for one or more of the College's functions or activities. Such an exception includes a "general health situation", where the College believes the collection of the sensitive information is necessary to lessen or prevent a serious threat to life, health or safety of an individual or to public health or safety, and it is unreasonable or impractical to obtain the individual's consent.

Unsolicited Personal Information: The College may receive information that it did not request. If the College is permitted to keep such information, it will do so under the same conditions as information it did request. If the College is not permitted to collect the information, it will destroy or de-identify the information, unless it is not lawfully reasonable to do so.

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 an employee.

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, or to which you have consented.

Pupils and Parents/Caregivers: In relation to personal information of pupils and parents/caregivers, the College's primary purpose of collection is to enable the College to provide schooling for the pupil. This includes satisfying both the needs of parents/caregivers and the needs of the pupil throughout the whole period the pupil is enrolled at the College. The purposes for which the College uses personal information of pupils and parents/caregivers include:

- To keep parents/caregivers informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- Day-to-day administration;
- Looking after pupils' educational, social and medical wellbeing;
- Seeking donations and marketing 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 pupil or parent/caregiver, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the pupil.

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;
- For seeking funds and marketing for the College;
- To satisfy 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, such as alumni associations, 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 be a quality learning environment in which 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 College's Foundation or alumni organisation.

Parents/caregivers, 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.

Should an individual not consent to this, they may contact the Principal in writing to opt out of being involved.

Who might the College disclose personal information to?

The College may disclose personal information, including sensitive information, held about an individual to:

- Another school;
- Government departments
- Medical practitioners;
- 3rd party service providers, including specialist visiting teachers, sports coaches and digital service providers including but not limited to Google, Microsoft, Sentral, Cyberhound and Palo Alto;
- Recipients of College publications, like newsletters and magazines;
- Parents
- Anyone you authorise the College to disclose the information to; and
- Anyone to whom we are required to disclose the information by law

Sending information overseas:

The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with "cloud" service providers which are situated outside Australia or to facilitate a school exchange. However, whilst it is unlikely that personal information would be disclosed to overseas recipients, 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.

In the event of personal information being disclosed overseas the recipient is bound not to breach the APPs in relation to this personal information.

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; and
- health information and biometric information about an individual.

There are instances when sensitive information is disclosed and held by a third party, for example, the College's Internet Service Provider, Google, Internet filtering and reporting service providers and other digital service providers.

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.

In accordance with APP 6, additional exceptions for using or disclosing personal information include:

- (a) To assist in locating a missing person;
- (b) To establish, exercise or defend a legal or equitable claim; or
- (c) For the purposes of a confidential alternative dispute resolution

MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

The College's staff are required to respect the confidentiality of pupils' and parents'/caregivers' personal information and the privacy of individuals. 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 passworded access rights to computerised records.

UPDATING PERSONAL INFORMATION

The College endeavours to ensure that the personal information it holds is accurate, complete and up to date. It will be updated at the start of each new calendar year and throughout the year as updates are requested and received. A person may seek to update their personal information held by the College if it is out-of-date, correct it if it is inaccurate or complete it if it is incomplete by contacting the Secretary of the College at any time or via the Skoolbag App. The Australian Privacy Principles require the College not to store personal information longer than necessary.

YOU HAVE THE RIGHT TO CHECK WHAT PERSONAL INFORMATION THE COLLEGE HOLDS ABOUT YOU

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. There are some exceptions to this right set out in the Act. Pupils will generally have access to their own personal information through their parents/caregivers, but older pupils may seek access themselves.

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

To make a request to access any information the College holds about you or your child, please contact the College Principal 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 expensive, 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 reason for refusal.

CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF PUPILS

The College respects every parent's/caregiver'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/caregivers. The College will treat consent given by parents/caregivers as consent given on behalf of the pupil, and notice to parents/caregivers will act as notice given to the pupil.

Parents/caregivers may seek access to personal information held by the College about them or their child by contacting the College Principal. However, there will be occasions when access is denied. Such occasions would include where the 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 pupil.

The College may, at its discretion, on the request of a pupil grant that pupil access to information held by the College about them, or allow a pupil to give or withhold consent to the use of their personal information, independently of their parents/caregivers. This would normally be done only when the maturity of the pupil and/or the pupil's personal circumstances so warrant.

COLLEGE BOARD ACCESS TO INFORMATION

Personal information is only provided to the College Board when it is pertinent to their consideration of the issue(s) involved.

ANONYMITY

Individuals who seek to find out information about the College regarding enrolments may do so without the need to identify themselves via the website contact page. Any further enquiries would need the individual being asked to identify themselves so that the questions and information sought may be answered in the most appropriate and helpful manner. (This precludes other businesses seeking information which may benefit their own above the College's interests).

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 the College has breached the Australian Privacy Principles, please contact the College Principal. The College will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as practicable after it has been made.

APPENDIX 1: Record Storage Summary

Record	Location	Access	Protection	Improvement?
Student Files hard copy	Admin office, server room	P, AP, and Admin staff	Locked room	
Student files ecopy	Digital SMS Database	Admin, teaching staff, GM	Password protected	
Staff Files hard copy	BM's office	P, BM, FA	Locked room, locked draw	
Staff Files e copy	Digital SMS Database	Admin, teaching staff, GM, IT	Password protected	
Financial files hard copy	BM's office draw	P, BM, FA	Room and draw locked	
Financial files ecopy	BM's local drive, Xero's cloud based servers	BM FA	Password protected	
Emergency student files	Digital SMS Database	Admin, teaching staff, GM	Password protected	
Allergy charts	Admin Office, staffrooms, sick bay and lunchroom	Admin, teaching staff, GM	Not accessible by students	
Student records hard copy	Staff record books, files in classrooms, offices	Teaching staff	Stored for accessibility with staff discretion	
Student records ecopy	Digital SMS Database and Report Drive	Admin, teaching staff, GM, IT	Password protected	
Caregiver information	Digital SMS	Admin, teaching staff, GM, IT	Password protected	
Staff and student Internet activity	Local device, Google cloud based servers, Cyberhound, Palo Alto Firewall, Internet Service Providers	3 rd Party Provider, Individual staff or student user, IT	Password protected	
Camera footage	Live feed School server	IT, BM, P	Password protected, locked room	
staff computer files	Local device, cloud	Staff, IT	Multifactor authentication	
Student computer files	Local device, cloud	Student, IT	Password protected	
Marketing leads information, parent and student information	Local device, cloud (Google, Wordpress, Jotform)	MM, IT, 3 rd Party Provider	Password protected	
Social Media, Website content	Local device, cloud (Google, Wordpress, Facebook)	MM, IT, 3 rd Party Provider	Password protected	

P = Principal

AP = Assistant Principal

PA = Principal's Assistant

BM = Business Manager

FA = Financial Assistant

MM = Marketing Manager

GM = Grounds and Maintenance Supervisor

IT = IT Team

Admin includes PA, BM and FA

Teaching staff includes P, AP, MM

Although the Principal does not have direct access to many of the College's digital records they have the authority for access via the IT team.