

Privacy Policy

How we handle collected
information about individuals



Beaconhills
College

SCOPE OF POLICY AND SOURCE OF OBLIGATION

The purpose of this policy is to ensure that in the course of Beaconhills College's activities, the College manages and protects personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the 13 Australian Privacy Principles (APPs).

SCOPE OF POLICY

This policy outlines the circumstances in which the College obtains personal information, how the College uses that information and how the College manages requests to access and/or change that information.

This policy applies to all students, parents, prospective parents, job applicants, staff, volunteers, past students, contractors, visitors and other people who come into contact with Beaconhills College ('the College') and its related bodies.

WHAT IS PERSONAL INFORMATION AND HOW IS IT COLLECTED?

Personal information is information or an opinion about an individual from which they can be reasonably identified. Depending on the circumstances, the College may collect personal information from the individual in their capacity as a student, parent, prospective parent, job applicant, staff, volunteer, past student, contractor, visitor and other people who come into contact with the College, or in some other capacity.

In the course of providing services the College may collect and hold:

- Personal information including names, addresses and other contact details; dates of birth; and financial information.
- Sensitive information including government identifiers (such as Tax File Number), nationality, country of birth, professional memberships, family court orders and criminal records.
- Health information (particularly in relation to prospective staff and student records) including medical records, disabilities, immunisation details and psychological reports.

As part of the College's recruitment processes for employees, contractors and volunteers, the College may collect and hold:

- Personal information including names, addresses and other contact details, dates of birth, financial information, citizenship, employment references, regulatory accreditation, media, directorships, property ownership and driver's licence information.
- Sensitive information including government identifiers (such as TFN), nationality, country of birth, professional memberships, family court orders and police checks.
- Health information (particularly in relation to prospective staff and student records) including medical records, disabilities, immunisation details and, nutrition or dietary requirements.

Generally, the College will seek consent from the individual in writing before it collects their sensitive information (including health information).

COLLECTION OF PERSONAL INFORMATION

The collection of personal information depends on the circumstances in which the College is collecting it. If it is reasonable and practical to do so, the College will collect personal information directly from the individual.

SOLICITED INFORMATION

The College has, where possible, attempted to standardise the collection of personal information by using specifically designed forms (eg Enrolment Forms). However, given the nature of its operations it often also receives personal information by email, letters, notes, via the College's website, over the telephone, in face-to-face meetings and through financial transactions, and via surveillance activities such as CCTV security camera's or email monitoring.

The College may also collect personal information from other people (e.g. a third-party administrator, referees for prospective employees) or independent sources. However, it will only do so where it is not reasonable and practical to collect the personal information from the individual directly.

INFORMATION COLLECTED FROM OUR WEBSITE

The College may collect information based on how individuals use its website. The College will use 'cookies' and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to its website. This information is collected to analyse and improve the website, marketing campaigns and to record statistics on web traffic. The College does not use this information to personally identify individuals.

UNSOLICITED INFORMATION

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UNSOLICITED INFORMATION

The College may be provided with personal information without having sought it through its normal means of collection. This is known as 'unsolicited information' and is often collected by:

- Misdirected postal mail – letters, notes, documents
- Misdirected electronic mail – emails, electronic messages
- Employment applications sent to the College that are not in response to an advertised vacancy
- Additional information provided to the College which was not requested
- Unsolicited information obtained by the College will only be held, used and or disclosed if it is considered as personal information that could have been collected by normal means. If that unsolicited information could not have been collected by normal means then the College will destroy, permanently delete or de-identify the personal information as appropriate.

COLLECTION AND USE OF SENSITIVE INFORMATION

The College will only collect sensitive information if it is:

- reasonably necessary for one or more of these functions or activities, and the College has the individual's consent
 - necessary to lessen or prevent a serious threat to life, health or safety
 - another permitted general situation
 - another permitted health situation.
 - The College may share sensitive information to other entities in the College, but only if necessary for it to provide its products or services.
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HOW DO WE USE PERSONAL INFORMATION?

The College only uses personal information that is reasonably necessary for one or more of its functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by the individual, or for an activity or purpose to which the individual has consented.

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

- providing education, pastoral care, extra-curricular and health services
- satisfying the College legal obligations including its duty of care and child protection obligations
- keeping parents informed as to school community matters through correspondence, newsletters and magazines
- facilitating communication between staff, parents and students by way of electronic means
- marketing, promotional and fundraising activities
- supporting the activities of school associations such as the Beaconhills Alumni Association;
- supporting the activities of the College Education Support Fund (CESF)
- supporting community based causes and activities, charities and other causes in connection with the College's functions or activities
- helping the College to improve its day-to-day operations including training of its staff
- systems development; developing new programs and services; undertaking planning, research and statistical analysis
- school administration including for insurance purposes
- employment of staff
- engagement of volunteers.

WHEN DOES THE COLLEGE DISCLOSE PERSONAL INFORMATION?

The College will only use or disclose sensitive or health information for a secondary purpose if you would reasonably expect it to use or disclose the information and the secondary purpose is directly related to the primary purpose.

The College may share personal information to related bodies corporate, but only if necessary for the College to provide its services.

The College may disclose information about an individual to overseas recipients only when it is necessary, for example to facilitate a student exchange program. The College will not however send information about an individual outside of Australia without their consent.

STORAGE AND SECURITY OF PERSONAL INFORMATION?

Beaconhills College stores personal information in a variety of formats including, but not limited to:

- databases
- hard copy files
- personal devices, iPads, phones, cameras, desktop and laptop computers
- third party storage providers such as cloud storage facilities
- paper-based files.
- The College takes all reasonable steps to protect the personal information it hold from misuse, loss, unauthorised access, modification or disclosure.
- These steps include, but are not limited to:
- restricting access and user privilege of information by staff depending on their role and responsibilities
- ensuring staff do not share personal passwords
- ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege
- ensuring access to the College's premises are secured at all times
- ensuring its IT and cyber security systems, policies and procedures are implemented and up to date
- ensuring staff comply with internal policies and procedures when handling the information
- undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime
- the destruction, deletion or de-identification of personal information it holds that is no longer needed, or required to be retained by any other laws.

The public website may contain links to other third-party websites outside of the College. The College is not responsible for the information stored, accessed, used or disclosed on such websites and we cannot comment on their privacy policies.

RESPONDING TO DATA BREACHES

The College will take appropriate, prompt action if it has reasonable grounds to believe that a data breach may have, or is suspected to have occurred. Depending on the type of data breach, this may include a review of its internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If it is unable to notify individuals, the College will publish a statement on its website and take reasonable steps to publicise the contents of this statement.

DISCLOSURE OF PERSONAL INFORMATION

Personal information is used for the purposes for which it was given to the College or for purposes which are related or directly related to one or more of its functions or activities.

Personal information may be disclosed to government agencies, within government regulated systems, other parents, other schools, recipients of school publications, visiting teachers, counsellors and coaches, service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- you have given consent; or
 - you would reasonably expect the personal information to be disclosed in that manner.
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DISCLOSURE OF YOUR PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

Personal information about an individual may be disclosed to an overseas organisation in the course of providing services, for example when storing information with a 'cloud service provider' which stores data outside of Australia, or to facilitate a school exchange or international tour.

The College may disclose personal information to overseas recipients located in, but not necessarily limited to, the following countries with whom the College deals with in relation to the hosting of long term students, students on exchange and Gap year programs:

- Canada, China, East Timor, Finland, France, Germany, Hong Kong, India, Indonesia, Italy, Japan, Malaysia, Poland, Sri Lanka, Switzerland, Thailand, The Netherlands, United Kingdom, Vietnam and United States of America.

The College will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- the College has the individual's consent (which may be implied)
- the College is satisfied that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime
- the College forms the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety, or
- the College is taking appropriate action in relation to suspected unlawful activity or serious misconduct.

THE QUALITY OF PERSONAL INFORMATION

The College takes all reasonable steps to ensure the personal information it holds, uses and discloses is accurate, complete and up-to-date, including at the time of using or disclosing the information. On an ongoing basis, the College maintains and updates the personal information when the College is advised by the individual or when the College becomes aware through other means that their personal information has changed.

If the College becomes aware that the personal information is incorrect or out of date, it will take reasonable steps to rectify the incorrect or out of date information.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

Individuals may submit a request to the College to access the personal information that the College holds, or request that the College changes the personal information. Upon receiving such a request, the College will take steps to verify the individual's identity before granting access or correcting the information.

If the College rejects the request, you will be notified accordingly. Where appropriate, the College will provide the reason/s for its decision. If the rejection relates to a request to change personal information, an individual may make a statement about the requested change and the College will attach this to their record.

COMPLAINTS

An individual can make a complaint about how the College manages personal information by notifying the College in writing as soon as possible. The College will respond to the complaint within a reasonable time (usually no longer than 30 days) and the College make seek further information in order to provide a full and complete response. The College does not charge a fee for the handling of complaints.

If the individual is not satisfied with its response, they may refer the complaint to the Office of the Australian Information Commissioner (OAIC). A complaint can be made using the OAIC online [Privacy Complaint Form](#) or by mail, fax or email. A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

HOW TO CONTACT THE COLLEGE

The College can be contacted about this Privacy Policy or about personal information generally, by:

- emailing: privacyofficer@beaconhills.vic.edu.au
- calling: 1300 002 225
- by mail: Privacy Officer
Mr David Young
Beaconhills College
30 – 34 Toomuc Valley Road
Pakenham, VIC 3810

If practical, you can contact the College anonymously (ie without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, the College may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

CHANGES TO PRIVACY AND INFORMATION HANDLING PRACTICES WITHIN THE COLLEGE

This Privacy Policy is subject to change at any time. Please check the Privacy Policy on the College's website www.beaconhills.vic.edu.au regularly for any changes. If you don't have access to a website, you may request a copy of this policy to be sent to you.

This Privacy Policy was last reviewed in June 2018.



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