



*Presbyterian Ladies' College*

MELBOURNE

## **PLC Privacy Policy**

### **Rationale**

As a result of the Commonwealth Privacy Amendment (Enhancing Privacy Protection) Act 2012, all private organisations and government agencies in Australia are required to upgrade their privacy policy. It is in compliance with these changes that this revised version of the policy has been drafted. The College regarded as an entity under the Act views the way it holds and uses private information as an important part of its ethics and ethos.

### **Aims**

It is the aim of this policy to ensure that private information (both personal and sensitive) is collected, used and disclosed, maintained, secured, made accessible, able to be corrected, and transferred over national borders in accordance with the Australian Privacy Principles, and to

- manage personal information in an open and transparent way;
- ensure that copies of our Privacy Policy are readily available to our community, both on the web-page and in hard-copy for those requiring it;
- allow access to information held by individuals for the purpose of correction;
- manage a complaints procedure allowing individuals to complain about a breach of the Australian Privacy Principles and to handle such complaints in a timely manner.

**Elaine Collin**  
**Principal**  
**20 November 2015**

Reviewed and updated 31 August 2017

The implementation of this policy will be the responsibility of the Privacy Committee: the Principal, Deputy Principal (Admin), Business Manager, Head of the Junior School and the Privacy Officer (Director of ICT).

## Privacy Procedures

These following practices, procedures and systems will be followed at all times, throughout the College:

### Collection

All requests for personal and sensitive information from parents or students must be accompanied by an appropriate collection notice, outlining why the information is needed.

### Use & Disclosure

Information will only be used for the purpose it was collected unless the person has consented, or the secondary purpose is related to the primary purpose and a person would reasonably expect such disclosure.

### Data Quality

The College will endeavour to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to date.

### Data Security

The College will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure.

### Openness

This policy document outlines the College's information handling.

### Access & Correction

The College within the limits and rights of the Australian Privacy Principles will give an individual access to personal information it holds about that individual on request, and the right to correct any information which is incorrect.

### Identifiers

The College will not adopt, use or disclose an identifier of a Commonwealth government 'agency'.  
Eg. Health Card numbers.

### Anonymity

Because of the nature of the College's operation it will take advantage of its right under the APP's to not allow anonymity.

### Cross border Data Flows

The College will forward information across national borders in accordance with the APP's. An organisation can only transfer personal information to a recipient in a foreign country in circumstances where the information will have appropriate protection.

### Sensitive Information

The College will not collect sensitive information unless the individual has consented or it can be justified in accordance with the APPs. Credit Card data held in compliance with PCIDSS (Payment Card Industry Data Security Standard).

### Complaints

Individuals may register a complaint about any perceived failure of the College to abide by the Australian Privacy Principles. Contact should be made in writing, or by email to the Privacy Officer at the College. Email: [privacy@plc.vic.edu.au](mailto:privacy@plc.vic.edu.au)  
Complaints will be handled in a manner consistent with the requirements of the Australian Privacy Principles.

**In collecting and holding information the following will be taken into consideration:**

- "personal information" means information or an opinion (including information or an opinion forming part of a database) whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can be reasonably be ascertained, from the information or opinion.
- "sensitive information" means information or an opinion about an individual, which for College use include; "racial or ethnic origin", "religious beliefs or affiliations", and "health information".
- 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, interviews and telephone calls, (ie for changes of address and workplace phone numbers).
- 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.
- in the course of teaching and learning the College will collect information relating to assessment, attitude, and behaviour that will be used within the College, and form the basis of reporting to parents.
- an employee record where the treatment is directly related to a current or former employment relationship between the College and the employee is not bound by the Australian Privacy Principles. While the Privacy Act does not apply to employee relations, the College will hold and secure all material relating to employees as if they were covered by the Privacy Act.
- the College will use personal information it collects for the primary purpose of education and care of its students and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which persons have consented. Such secondary purposes may include extra curricular activities.
- 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 enrol or continue the enrolment of the student.
- 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 College also obtains personal information about volunteers who assist the College in its functions (eg Parents' Associations) or conduct associated activities. Personal information about volunteers working with our associated body (The Old Collegians' Association) is also collected.
- the College (usually through the Development Office) 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 both 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. Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising requests. College publications, such as PLC In Print, PLC Newsletter, Combinations, and Patchwork, which include personal information, may be used for marketing purposes.
- the College may disclose personal information, including sensitive information, held about an individual to:
  - another College;
  - government Departments (including Education Departments both State and Federal);
  - medical practitioners, psychologists and police;
  - people providing services to the College, including specialist visiting teachers, after-school care and other after-school contracted service providers, sports coaches, and outdoor education contractors;
  - recipients of College publications, like newsletters and magazines; but with the proviso that the surnames of students within the Junior School will never be given to the press, and that previously given permission for publication will be always referred to for College publicity purposes;
  - with the Senior School similar procedures will be followed when permission to publish names and images of students;
  - anyone a person may authorise the College to disclose information to;
  - educational research agencies (with the consent of individual students).
- ***Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless it is agreed otherwise, or the use or disclosure of that sensitive information is allowed by law.***

#### *Updating personal information*

***The College endeavours to ensure that the personal information it holds is accurate, complete and up-to date. A person may seek to update their personal information held by the College by contacting the Administration Office.***

## *Website Privacy Statement*

### Information collected

When our website is accessed, our Web Service Provider makes a record of the visit and logs the following information for statistical purposes:

- the server address
- the top level domain name (for example .com, .gov, .au, uk etc)
- the date and time of the visit to the site
- the pages accessed and documents downloaded
- the previous sites visited
- the type of browser being used

### ***Access to information collected***

The Office of the Federal Privacy Commission will not make an attempt to identify users or their browsing activities. However, in the unlikely event of an investigation a law enforcement agency or other government agency may exercise its legal authority to inspect our Internet Service Provider's logs.

### Use of information collected

The College will only record email addresses if a message is sent. The email address will only be used for the purpose for which it has been provided and it will not be added to a mailing list or used for any other purpose without consent.

This site does not provide facilities for the secure transmission of information across the Internet. Users should be aware that there are inherent risks transmitting information across the Internet.

### ***Contact the College***

Please contact the College for further information on [privacy@plc.vic.edu.au](mailto:privacy@plc.vic.edu.au)

## **Part 1 — Consideration of personal information privacy (APPs 1 and 2)**

### **APP 1 — open and transparent management of personal information**

The object of this principle is to ensure that APP entities manage personal information in an open and transparent way. PLC is an entity under the Privacy Act.

### **APP 2 — anonymity and pseudonymity**

Individuals must have the option of not identifying themselves, or of using a pseudonym, when dealing with an APP entity in relation to a particular matter.

*This APP will not apply to an entity such as PLC as it is exempt from complying with this APP as it is impracticable for the College to deal with individuals who have not identified themselves or who have used a pseudonym.*

## **Part 2 — Collection of personal information (APPs 3, 4 and 5)**

### **APP 3 — collection of solicited personal information**

Where an APP entity is an organisation such as PLC, it must not collect personal information (other than sensitive information) unless the information is reasonably necessary for one or more of the entity's functions or activities.

#### *Sensitive information*

An APP entity must not collect sensitive information about an individual unless, in the case of an organisation that information is reasonably necessary for one or more of the entity's functions or activities.

### **APP 4 — dealing with unsolicited personal information**

If an APP entity receives personal information; and the entity did not solicit the information; the entity must, within a reasonable period after receiving the information, determine whether or not the entity could have collected the information under Australian Privacy Principle 3 if the entity had solicited the information.

### **APP 5 — notification of the collection of personal information**

At or before the time of collection (or as soon as practicable after), an APP entity must take reasonable steps to notify an individual about the purpose and use of information which has been collected from them. At PLC this information is conveyed by the use of a 'Standard Collection Notice', which accompanies any request for individuals to provide personal or sensitive information to the College. Within that collection notice details about the address, contact details for the obtaining of copies of the College Privacy Policy, and issues regarding access and complaints of infringements of the APP's are outlined.

## **Part 3 — Dealing with personal information (APPs 6, 7, 8 and 9)**

### **APP 6 — use or disclosure of personal information**

#### *Use or disclosure*

If an APP entity holds personal information about an individual that was collected for a particular purpose (the primary purpose), the entity must not use or disclose the information for another purpose (the secondary purpose) unless the individual has consented to the use or disclosure of the information.

**Note:** Australian Privacy Principle 8 sets out requirements for the disclosure of personal information to a person who is not in Australia or an external Territory.

### **APP 7 — direct marketing**

If an organisation holds personal information about an individual, the organisation must not use or disclose the information for the purpose of direct marketing, unless it has the individual's consent. Sensitive information cannot be used for direct marketing purposes without an individual's consent.

### **APP 8 — cross-border disclosure of personal information**

Before an APP entity discloses personal information about an individual to a person (the overseas recipient) the entity must take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the Australian Privacy Principles (other than Australian Privacy Principle 1) in relation to the information.

**Note:** In certain circumstances, an act done, or a practice engaged in, by the overseas recipient is taken, under section 16C, to have been done, or engaged in, by the APP entity and to be a breach of the Australian Privacy Principles.

### **APP 9 — adoption, use or disclosure of government related identifiers**

An organisation must not adopt a government related identifier of an individual as its own identifier of the individual.

## **Part 4 — Integrity of personal information (APPs 10 and 11)**

### **APP 10 — quality of personal information**

An APP entity must take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that the entity collects is accurate, up-to-date and complete.

### **APP 11 — security of personal information**

If an APP entity holds personal information, the entity must take such steps as are reasonable in the circumstances to protect the information from misuse, interference and loss; and from unauthorised access, modification or disclosure. Where a school no longer needs the person information it must destroy or de-identify it.

## ***Part 5 — Access to, and correction of, personal information (APPs 12 and 13)***

### **APP 12 — access to personal information**

If an APP entity holds personal information about an individual, with limited exceptions, the entity must, on request by the individual, give the individual access to the information.

### **APP 13 — correction of personal information**

An APP entity must take reasonable steps to correct any personal information that is inaccurate, out of date, incomplete, irrelevant or misleading. If an entity has disclosed information to another organisation, it must take reasonable steps to notify that organisation of any corrections where the individual has requested the entity to do so.

## Appendix 2: Standard Collection Notice

### Standard Collection Notice

A requirement of the Australian Privacy Act  
**Parents should retain this sheet for future reference.**

The College collects personal information, including sensitive information about students and parents or guardians before, during and beyond the course of a student's enrolment at the College. The primary purpose of collecting this information is to enable the College to provide schooling for your daughter. This includes satisfying the needs of parents and guardians and the needs of the student throughout the whole period she is associated with the College. This information may be collected via post, email or sms.

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. Some laws governing or relating to the operation of Colleges require that certain information is collected. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We require medical reports about students from time to time. If you do not consent to us obtaining this information we may not be able to enrol or continue the enrolment of your daughter.

The College from time to time has to disclose certain personal information and sensitive information to others, including other Colleges, government departments, medical practitioners, publications and people providing services to the College, including specialist visiting teachers (sports/music), coaches and volunteers.

Parents may seek access to personal information collected about them and their daughter by contacting the College. However, there will be occasions when access is denied. Such occasions would include where the release would have an unreasonable impact on the privacy of others or where release may result in a breach of the College's duty of care to the student.

As you may know the College from time to time engages in fund raising activities. The information received from you may be used to make an appeal to you.

If you provide the College with the personal information of others, such as doctors, or emergency contacts, you should inform them that you are disclosing that information to the College and why, so that they can access that information if they wish. The College does not usually disclose the information to other parties.

If you wish to obtain a copy of our Privacy Policy please contact the College, or alternatively visit our webpage: [www.plc.edu.vic.au](http://www.plc.edu.vic.au)

If you wish to contact the College regarding personal information we hold, or to complain about any instances where the College may have been deemed to infringe any of the Australian Privacy Principles, a complaint should be lodged with the College's Privacy Officer.

Elaine Collin  
Principal



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## Prospective Employee Collection Notice

*A requirement of the Australian Privacy*

**Prospective Employees should retain this sheet for future reference.**

In applying for a position at Presbyterian Ladies' College you will be providing us with a range of personal information. We can be contacted at 141 Burwood Highway, Burwood 3125 (Phone 9808 5811 Fax 9808 5998)

If you provide us with personal information, for example, your name and address or information contained in your resume, we will collect the information in order to assess your application. You agree that we store this information for six months.

We will not disclose this information to a third party without your consent.

We are required to conduct a criminal records check.

Where you have provided us with the name and address of referees in connection with your application, you should inform them that you have done so and the reason for it. You should also inform them that the information is to be used solely in connection with your application for employment or engagement. Your nominated referees may be contacted by the College at any stage after we have received your application.

A handwritten signature in black ink that reads 'Elaine Collin'.

**Elaine Collin**  
**Principal**