



REGENT COLLEGE PRIVACY

Under the Privacy Act 1988 & Privacy Amendment (Enhancing Privacy Protection) Act 2012, Regent College is required to provide you with certain information as to how we protect your privacy and how we comply with the requirements of the Act and the 13 Australian Privacy Principles (APP's). This information is set out in our Privacy Policy below, and which is available on the Regent College public website (www.regentcollege.wa.edu.au). In addition, it is also available upon request in hard copy from the Regent College Administration.

The College may, from time to time, review and update this Privacy 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.

What kinds of personal information does the College Collect?

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

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the College;
- job applicants, staff members, guests, visitors, 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 students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and students provide personal information.

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.

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 the 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 by you, or to which you have consented.

Students and Parents: In relation to personal information of students and Parents, the College's primary purpose of collection is to fulfil its educational purpose and to satisfy legal obligations. 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 education, through correspondence, and newsletters
- day-to-day administration of the College;
- looking after students' educational needs and wellbeing;
- fundraising activities for the College; and
- 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 student or permit the student to take part in a particular activity.

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; and
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

Guests, Visitors and Volunteers: The College also obtains personal information about guests, visitors and volunteers who assist the College in its functions, to enable the College and the guests, visitors and volunteers to work together.

Marketing and fundraising: The College treats marketing and fundraising activities as an important part of ensuring that the College continues to provide a quality learning environment in which both students and staff thrive. The College will not disclose your personal information to third parties for marketing or fundraising purposes without your consent. Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters which include personal information, may be used for marketing purposes.

Photos, Images and Video: From time to time the College uses images of the students in photos, video footage or PowerPoint presentations within the College community or to promote the College. This can happen in class, at assembly, in the newsletter, on the College website, concert DVD, at information nights or in the College prospectus. Except for formal class photographs, when used outside the classroom these images are published without the student's surname attached.

Who might the College disclose personal information to?

The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools;

- government departments;
- medical practitioners;
- people providing educational, support and health services to the College, including specialist visiting teachers, counsellors and sports coaches;
- recipients of College publications, such as newsletters;
- parents;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Sending and storing information overseas: The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school 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); or
- 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.

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.

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.

Data Breaches

A data breach occurs when personal information is lost or subject to unauthorised access. Modification, disclosure, or other misuse of interference. For schools, data breaches commonly occur due to internal human errors or a failure to follow information handling policies that result in personal information being inadvertently lost or disclosed to the wrong person.

Responding to Data Breaches

The College will take appropriate, prompt action if we have reasonable grounds to believe a data breach may have or is suspected to have occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, notifying affected individuals and Office of the Australian Information Commissioner (OAIC). If we are unable to notify individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

Access and correction of personal information

Under the 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. Primary students will generally be able to access and update their personal information through their Parents.

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

To make a request to access or update any personal information the College holds about you or your child, please contact the 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 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.

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 student, and notice to Parents will act as notice given to the student.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the Principal. However, there will 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 so warranted.

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 Principal or email admin@regentcollege.wa.edu.au. 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.

If the complaint is unable to be resolved at the College level, the Privacy Commissioner may investigate the complaint. However, the Privacy Commissioner may decide not to investigate a matter if the individual has

not first brought the complaint to the College, unless the Privacy Commissioner is to the view that this would be appropriate.

Updated 8th February 2019