



**Approved:**

Principal: 29-08-2017

College Council: 29-08-17

**Review:** Every 4 years (Before Aug '21)

## PRIVACY POLICY

### Purpose of this Policy

This policy outlines the Melton Christian College (MCC) practices on how the College uses and manages personal information provided to or collected by it. MCC is bound by the National Privacy Principles (NPP) contained in the *Commonwealth Privacy Act 1998*.

### Updating this Policy

MCC may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to College operations and practices, and to make sure it remains appropriate in respect of MCC being a Christian school expressly founded for the purpose of providing Christian education for those families who wish to choose that for their children.

If MCC decides to change its practice in relation to privacy and the management of personal information, it will make those changes in this privacy statement which is its Privacy Policy.

### What kind of information does the Melton Christian College collect and how is it collected?

The type of information MCC collects and holds includes (but is not limited to) personal information, it is acknowledged that some such information may be considered to be sensitive information, about:

- pupils and parents and/or guardians ('Parents') 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 individuals or families provide: MCC will generally collect personal information held about an individual by way of hard-copy or soft-copy forms filled out by Parents or pupils, face-to-face meetings and interviews, other soft-version data collection, and telephone calls. On occasions people other than Parents and pupils provide personal information.

Personal Information provided by other people: In some circumstances MCC 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: The NPPs 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 employee.

## **How will Melton Christian College use the personal information that people provide?**

MCC will use personal information it collects 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 the provider has consented.

Pupils and Parents: In relation to personal information of pupils and Parents, MCC's primary purpose of collection is to enable the College to provide schooling for the pupil. This includes satisfying both the needs of Parents and needs of the pupil throughout the whole period the pupil is enrolled at MCC.

The purposes for which MCC uses personal information of pupils and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, whether digital or hard-copy, newsletters and magazines;
- day-to-day administration;
- looking after pupils' educational, social and medical wellbeing;
- seeking donations and marketing for MCC;
- to satisfy MCC's legal obligations and allow the College to discharge its duty of care.

In some cases where MCC requests personal information about a pupil or Parent, 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 MCC 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;
- seeking funds and marketing for MCC;
- to satisfy MCC's legal obligations, for example, in relation to child protection legislation.

Volunteers: MCC also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, to enable the College and the volunteers to work together.

Marketing and fundraising: MCC 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 MCC may be disclosed to an organisation that assists in the College's fundraising. Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. MCC publications, like newsletters and magazines, which include personal information, may be used for marketing purposes via soft or hard media.

## **Who might Melton Christian College disclose personal information to?**

MCC may disclose personal information, including potentially sensitive information, held about an individual to:

- another school;
- government departments;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers, testing agencies and sports coaches;
- recipients of College publications, like newsletters and magazines;
- parents; and
- anyone that the provider of the information authorises MCC to disclose information to.

Sending information overseas: apart from the obvious reality that websites and certain other digital forms of passive distribution of information can be accessed anywhere without international limitations, MCC will not actively 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 National Privacy Principles.

## **How does Melton Christian 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, sexual preferences or criminal record, that is also personal information; and health information about an individual.

Sensitive information will be used and disclosed only for the purposes 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 required by law.

## **Management and security of personal information**

The College's staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

MCC has in place steps to protect the personal information the College holds from misuse, loss, unauthorised access, modification or disclosure by us of various methods including locked storage of hard-copy records and digitally secured access to soft-copy records.

## **Updating personal information**

MCC 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 office of the College at any time.

## **Disposing of Information**

The National Privacy Principles require MCC not to store personal information longer than necessary and personal information no longer required by the College will be disposed of securely.

## **An individual has the right to check what personal information Melton Christian College holds about them.**

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 personal information through their Parents, but older pupils may seek access themselves, whenever appropriate Parents will be informed. Notwithstanding that, this policy acknowledges that sometimes situations arise when College staff may reasonably suspect that abuse or other criminal activity may mean it is important for a student's confidentiality to be maintained. In such an instance it is most likely that a child protection agency be contacted also.

To make a request to access any information MCC holds about you or your child, please contact the Principal in writing or by email.

MCC 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.

## **Consent and rights of access to the personal information of pupils**

MCC respects every Parent's right to make decisions concerning their child's education.

Generally, MCC will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. The College will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil. Parents may seek access to personal information held by MCC about them or their child by contacting the office. 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 pupil.

MCC 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. This would normally be done only when the maturity of the pupil and/or the pupil's personal circumstances so warranted.

## **Website and Digital Information**

MCC collects and use information throughout our website only within the guidelines as explained in this Privacy Policy.

MCC gathers two types of information about users. Firstly, information that users provide through optional, voluntary submissions. For example, there are voluntary submissions to receive the College newsletters or contact forms via the MCC website. Secondly, information MCC gathers through aggregated tracking information derived mainly by tallying page views throughout our sites. This information allows us to better tailor our content to readers' needs and to better understand the demographics of our users. MCC

may track user patterns of the website. However, MCC does not correlate this information with data about individuals.

Under no circumstances does Melton Christian College divulge any information about an individual user to a third party, except to comply with applicable law or valid legal process or to protect the personal safety of our users or the public. The information we collect is never shared with other organisations for commercial purposes, and only used to provide more relevant content and to make our site more user-friendly.

Consistent with the Commonwealth Privacy Act and National Privacy Principles, MCC will never knowingly request personally identifiable information from anyone under the age of 13 without requesting parental consent.

### **Use of information**

Melton Christian College uses any information voluntarily given by our users to enhance their experience in our network of sites, whether to provide interactive or personalized elements on the sites or to better prepare future content based on the interests of our users.