

## Privacy Policy

This Privacy Policy sets out how University Senior College (USC or the College) uses and manages personal information and your rights in relation to your personal information, including how to complain and how we deal with your complaints.

The College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988.

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 school environment. The current version of this Privacy Policy is published on our website at <https://usc.adelaide.edu.au/school-policies>.

### **Kinds of personal information we collect**

The types 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, caregivers and/or legal guardians (collectively called 'Parents') before, during and after the course of a student's enrolment at the College, including:
  - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
  - Parents' education, occupation, language spoken at home, nationality and country of birth
  - medical and health information (e.g., details of disability and/or allergies, absence notes, medical reports and names of doctors)
  - results of assignments, tests and examinations
  - conduct and complaint records, or other behaviour notes, and school reports
  - information about referrals to government welfare agencies
  - counselling reports
  - health fund details and Medicare number
  - any Family Court orders
  - criminal records
  - volunteering information, and
  - photos and videos at College events
- job applicants, volunteers and contractors, including:
  - name, contact details (including next of kin) and date of birth
  - information on job application
  - professional development history
  - salary and payment information, including superannuation details
  - health information (e.g., details of disability and/or allergies, and medical certificates)
  - complaint records and investigation reports

- leave details
  - photos and videos at College events
  - workplace surveillance information, and
  - work emails and private emails (when using work email address) and Internet browsing history
- other people who come into contact with the College, including name and contact details and any other information necessary for the particular contact with the College.

### **How we collect personal information**

***Personal information you provide:*** The College generally collects personal information about an individual directly from the individual (or their Parent in the case of students). This includes by way of forms, face-to-face or online meetings and interviews, emails and telephone calls.

***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, a reference from another school or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

***Personal information from other sources:*** We may also collect personal information through security surveillance activities such as CCTV security cameras.

### **Purposes for which we collect, use and disclose personal information**

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.

The purposes for which the College collects, uses and discloses personal information depend on our relationship with you and include the following:

#### ***Students and Parents:***

- providing schooling and school activities
- to exercise the College's duty of care
- satisfying the needs of Parents, the needs of students and the needs of the College throughout the whole period a student is enrolled at the College
- making required reports to government authorities
- keeping Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- to perform necessary administrative activities for the day-to-day administration of the College
- providing assessment information to such bodies as the SACE Board, SATAC and universities
- looking after students' educational, social and health wellbeing
- seeking donations and marketing for the College, and
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

**Volunteers:**

- to contact you about and administer the volunteer position
- for insurance purposes, and
- for satisfying the College's legal obligations, for example, in relation to child protection legislation.

**Job applicants and contractors:**

- assessing and if successful engaging the applicant or contractor
- administering the individual's employment or contract
- seeking donations and marketing for the College
- for insurance purposes, and
- satisfying the College's legal obligations, for example, in relation to child protection legislation.

**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 employee.

**Who we disclose personal information to**

The College may disclose personal information, including sensitive information, for educational, care and administrative purposes, and to seek support and advice. This may include to:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student
- government departments (including for policy and funding purposes)
- The SACE Board, SATAC and universities
- medical practitioners
- people providing educational, support and health services to the College, including specialist visiting teachers, specialist advisers, volunteers, and counsellors
- organisations that assist us with fundraising
- providers of specialist advisory services and assistance to the College, including in the areas of Human Resources, child protection and students with additional needs
- providers of learning and assessment tools
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA)
- agencies and organisations to whom the College is required to disclose personal information for education, funding and research purposes
- people providing administrative and financial services to the College
- the provider of our information management and storage system and other information technology services
- recipients of College publications such as newsletters, magazines and the Yearbook
- student's Parents, caregivers or guardians
- anyone you authorise the College to disclose information to, and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

In any situation outside the usual business of the College, permission to disclose information will be sought.

### **Treatment of Sensitive Information**

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 required or allowed by law.

### **How we store personal information**

We store your personal information in hard copy and electronically. We use information management and storage systems provided by third-party service providers. Personal information is stored with and accessible by the third-party service providers for the purpose of providing services to the College in connection with the systems. 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.

### **Sending and storing information overseas**

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 and 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 and provide technical support. 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.

The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which may be situated outside Australia. For example, the College reporting system is a web-based system protected by a secured network, used by teachers to prepare written reports to students and families on their progress. Likewise, individual teachers, in the course of their work, may store records of student marks and attendance with 'cloud' service providers, perhaps as a backup to protect against loss of important data. The College will seek assurance from providers of such services that they are aware of their obligations and complying with the Australian Privacy Principles or other applicable privacy legislation.

The College may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate a school exchange or to help a student gain a place in an overseas university. In cases such as these, the student and the Parents, in applying for this support, are implying consent for such information to be shared.

## **Fundraising**

The College considers marketing and seeking donations for its future growth and development as important parts of ensuring that it continues to be a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the College's gift funds or alumni organisation.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

If you do not wish to receive direct marketing communications from the College, please advise the Privacy Officer in writing.

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

College staff are required to respect the confidentiality of student and Parent personal information and the privacy of individuals.

The College has in place steps to protect the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records, restricted access, building and security alarms, password access rights to computerised records, firewalls and other security technology. These steps include:

- Restricting access to information on the College databases on a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile
- Ensuring all staff are aware that they are not to reveal or share personal passwords
- Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need-to-know basis
- Implementing physical security measures around the College buildings and grounds to prevent break-ins
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on the College's computer networks
- Implementing Human Resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information, and
- Undertaking due diligence with respect to third-party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

## **Access and correction of personal information**

Under the Commonwealth Privacy Act, an individual has the right to seek access to, and/or correction of, any personal information which the College holds about them. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

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

To make a request to access, update or correct any personal information the College holds about you or your child, please contact the Privacy Officer in writing. The College may require you to verify your identity and specify what information you require. The College may charge a reasonable administration fee for giving access to your personal information (but will not charge for the making of the request or to correct your personal information). If the information sought is extensive, the College will advise the likely cost in advance.

The College will respond to all requests for access or correction within a reasonable time. There may be occasions when access may be denied. Such occasions would include where release of the information might 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 an individual. If we cannot provide you with access to the information, we will provide you with written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons).

### **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. Generally, 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.

Parents may seek access to personal information held by the College about them or their child by contacting the Privacy Officer in writing. However, there may be occasions when access is denied. Such occasions may include (but are not limited to) where:

- students have provided information in confidence
- the College believes the student has capacity to consent and the College is not permitted to disclose the information to the Parent without the student's consent
- 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 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 warrant it.

### **Data Breach**

A data breach concerns the security of personal information and involves the actual unauthorised access or disclosure of personal information, or the loss of personal information where the loss is likely to result in unauthorised access or disclosure. A data breach is different from an interference with privacy that involves a breach of another privacy principle such as a use or disclosure of personal information which is not permitted under the Privacy Act.

In the event of a data breach, the College will comply with its notification obligations under the Privacy Act. The College has in place a Data Breach Response Plan which staff are required to follow in the event that a data breach occurs or is suspected to have occurred.

## **Enquiries, feedback 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 Privacy Officer in writing. The College will investigate any complaint and will notify you of the outcome of the investigation as soon as is practicable.

The College's Privacy Officer is:

Ms Anita Zocchi  
School Principal  
Telephone: 08 8313 4988  
Email: [usc@adelaide.edu.au](mailto:usc@adelaide.edu.au)

If you are dissatisfied with the way in which the College has handled your complaint, you may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, [www.oaic.gov.au](http://www.oaic.gov.au)