PRIVACY POLICY

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Reviewed by:	Principal
Policy Owner:	Director of Finance and Operations
Approved by Board:	March 2025

1. Purpose

This Privacy Policy sets out how Seymour College manages personal information provided to or collected by it.

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.

For the purposes of this policy, the term *parent* applies to parents or legal guardians of students

2. Application

This policy applies to all employees, students, staff, volunteers, parents, Old Collegians (hereinafter collectively referred to as 'Community') contractors including international agents and visitors and other people who are associated with, or come in contact with, Seymour College.

3. Collection of Information

In this policy, personal information means any information about an identified individual or an individual who is reasonably identifiable or as otherwise defined by applicable data protection law.

Kinds of Personal Information we 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:

1. Students, Old Collegians and 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 and language spoken at home, nationality and country of birth;
    - Health information (e.g. details of disability and/or allergies, dietary requirements, absence notes, immunisation details, 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 including government issued clearance checks;
    - Photos and videos at College and Old Collegians events;

2. Job applicants, staff members, volunteers and contractors, including:
    - Name, contact details (including next of kin), date of birth, and religion;
    - Information on job application;
    - Psychometric and other behavioural survey information completed with consent;
    - 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;
    - Work emails and private emails (when using work email address) and internet browsing history;

3. 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 will generally collect 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 meetings and interviews, emails and telephone calls. The College also collects personal information when a

student uses their issued Student Card and Flexischools account.

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 surveillance activities (such as CCTV security cameras) and student email and internet browsing monitoring.

Note: 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.

4. Purposes for which the College Collects, Uses and Discloses Personal Information

Students, Parents and Old Collegians

In relation to personal information of students and parents, the College's primary purpose of collection is to enable the College to provide schooling and school activities to students enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College. 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.

In relation to Old Collegians, the primary purposes of collecting this information is to enable us to inform you about the activities of the College and the Old Collegian's Association, and to keep Old Collegians connected with one another.

The purposes for which the College uses personal information of students, parents and Old Collegians include:

- Making required reports to government authorities;
- Admissions and enrolment matters;
- To keep parents informed about matters related to their child's schooling, through correspondence, apps, newsletters and magazines;
- Day-to-day administration of the College;
- Looking after students' educational, social and health wellbeing;
- Drawing upon the expertise of members of the College community to assist with functions and other operations of the College;
- Seeking donations or financial support for the College (see the "Fundraising' section of this Privacy Policy);

- Marketing and promotion for the College;
- To keep Old Collegians informed about current events and activities;
- To enable Old Collegians to stay connected with other Old Collegians;
- To support the activities of College associations such as the Old Collegian's Association;
- 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.

Prospective Employees, Contractors and Volunteers

In relation to personal information of job applicants and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant, or contractor, as the case may be.

The purposes for which the College uses personal information of job applicants and contractors include:

- Administering the individual's employment or contract, as the case may be;
- For insurance purposes;
- Seeking donations or financial support for the College;
- Marketing and promotion for the College (see the "Fundraising' section of this Privacy Policy);
- Satisfying the College's legal obligations, for example, in relation to child protection legislation.

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as the Seymour College Old Collegian's Association and the Parents and Friends Association, to enable the College and the volunteers to work together.

The purposes for which the College uses personal information of volunteers include:

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

Fundraising and Marketing

The College 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 provide a quality learning environment in which both students and staff thrive. Your personal information may be used to make an appeal to you. It may also

be disclosed to organisations that assist in the College's fundraising activities, for example, the College's Old Collegians Association or, on occasions, external fundraising organisations or nominated board sub-committee members or any other Board approved individuals.

Parents, staff, volunteers and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.
If you do not want to receive marketing and fundraising communications from the College, please contact the College's Privacy Officer

5. Disclosure of Information

Seymour College may disclose personal information, including sensitive information for educational, care and administrative purposes, and to seek support and advice. This may include disclosing information 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);
- Credit reporting bodies;
- Medical practitioners;
- People providing educational, support and health services to the College, including specialist visiting teachers, coaches, volunteers, and counsellors;
- Organisers that assist us with fundraising (see the Fundraising section of the Privacy Policy);
- Providers of specialist advisory services and assistance to the College;
- Providers of learning and assessment tools;
- Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- Agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;
- Providers of school competitions;
- 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 Seymour College and Old Collegian's Association publications and materials, such as newsletters, magazines and websites;
- Students' parents and guardians;
- The Seymour College Old Collegian's Association
- Any other parties to whom Seymour College is authorised to disclose information
- Anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange, study tours and cultural immersions. 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.

6. How we Store Personal Information

The College stores personal information in hard copy and electronically. The College uses 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 uses 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. The service provider that the College uses is Microsoft Office 365. 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 server which may be situated outside Australia.

College personnel and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering this and ensuring its proper use.

We collect credit card information (card number, expiration date, CVV, cardholder name) for the purpose of processing payments. This information is encrypted and securely stored using industry-standard security measures. We are PCI DSS compliant and do not store any sensitive data longer than necessary.

7. Management and Security of Personal Information

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.

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 staff are aware that they are not to reveal or share personal passwords

by implementing training and awareness activities;
- 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 security measures around the College buildings and grounds;
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks;
- Implementing 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;
- 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.

Seymour College will take reasonable steps to ensure that information under our direct control is destroyed when it is no longer required by law to save and except for information retained for archival/historical records.

8. Access and Correction of Personal Information

Under the Commonwealth Privacy Act, an individual has the right to seek and obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. 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 or to update any personal information the College holds about you or your child, please contact the College telephone or 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 (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to lodge a complaint.

9. 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.

Parents may seek access to personal information held by the College about them or their child by contacting the College by telephone or in writing. However, there may 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 warrant it.

10. 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 College Principal by writing or telephone.

Principal
Seymour College Inc
546 Portrush Road
Glen Osmond SA 5064
Telephone: (08) 8303 9000
Email: principalsoffice@seymour.sa.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 an individual has a complaint about how Seymour College has collected, stored or used personal information, please contact the College by phone or email. Seymour College will endeavour to deal with your complaint and take any steps necessary to resolve the matter within 14 business days.

If your complaint is unable to be resolved within 14 business days, Seymour College will advise you in writing including letting you know when it expects to provide a response.

If you are unhappy with the College's response, you can refer your complaint to the Office of the Australian Information Commissioner (OAIC) via the OAIC website www.oaic.gov.au.

11. References and Resources

The Privacy Act 1988 & Privacy Amendment (Enhancing Privacy Protection) Act 2012 together with the Australian Privacy Principles (APPS).

National Catholic Education Commission and Independent Schools Australia, Privacy Compliance Manual, April 2023.

Office of the Australian Information Commissioner website.