1 Purpose:
Radford College is required to collect information about staff, students and others with a role within the College, to ensure their safety and wellbeing and to allow the operation of the College. This policy outlines the College’s systems for collecting, using, managing and storing personal information as legislated in the Australian Privacy Principles contained in the Privacy Amendment (Enhancing Privacy Protection) Act 2012, the Health Records (Privacy and Access) Act 1997, and the Workplace Privacy Act 2011.

2 Application and Scope:
This policy applies to all staff at the College.

3 Definitions:

<table>
<thead>
<tr>
<th>Word/Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Sensitive information</td>
<td>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; and health information about an individual.</td>
</tr>
<tr>
<td>Staff</td>
<td>All reaching, support and other staff members.</td>
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4 Policy:

4.1 Information Collected
The College only collects information required to perform its functions and fulfil its legal obligations, including a duty of care. This information is collected and managed in accordance with relevant privacy legislation.

The type of information the College collects and holds includes (but is not limited to) personal information, including sensitive information, about:
- Student and parents and or guardians before, during and after the course of a student’s enrolment at the College
- Job applicants, staff members, volunteers and contractors; and
- Other people who come into contact with the College such as Board members and volunteers.

4.1.1 Personal Information
The College will generally collect personal information about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, emails and telephone calls.

4.1.2 Personal Information Provided by Other People
In some circumstances, Radford 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.

4.1.3 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.
4.1.4 Use of Personal Information
Radford College will not use personal information or disclose information it collects other than in specified circumstances including:

- for the primary purpose for which it is collected
- with the individual's consent
- for such other secondary purposes that are related to the primary purpose and are reasonably expected
- where required under law
- where the school believes there is threat to life, health or public safety
- where the school believes an unlawful activity has taken place
- where the school believes the use of the information is reasonable necessary to assist with locating a person reported as missing.

4.1.5 Students and Parents
In relation to personal information of students and parents, Radford College’s primary purpose of collection is to enable it to provide schooling to, and a duty of care for, the student. This includes satisfying both the needs of parents and the needs of the student throughout the whole period the student is enrolled at the College. The purposes for which personal information of students and parents is used include:

- keeping parents informed about matters related to their child's schooling, through correspondence
- newsletters and magazines
- day-to-day administration
- looking after students' educational, social, spiritual and medical wellbeing
- seeking donations and marketing for the College
- satisfying the College's legal obligations and allowing the College to discharge its duty of care.

Where the College requests personal information about a student or parent, and the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the student.

4.1.6 Job Applicants, Staff Members and Contractors
In relation to personal information of job applicants, staff members and contractors, Radford 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:

- administering the individual’s employment or contract, as the case may be
- for insurance purposes
- seeking funds and marketing for the College
- satisfying Radford College's legal obligations, for example, in relation to child protection legislation.

The College complies with the Tax File Number Guidelines 2011 issued under s17 of the Privacy Act 2988 (Privacy Act) which regulate the collection, storage, use, disclosure, security and disposal of individuals’ TFN information.

4.1.7 Volunteers
Radford College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as the P & F Association and the Collegians Association, to enable the College and the volunteers to work together.

4.1.8 Marketing and Fundraising
Radford 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 be a quality learning environment in which both students and staff thrive. Personal information held by Radford College may be disclosed to an organisation that assists in the College's fundraising, for example the P & F Association and the Collegians Association.

Parents, staff, contractors 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.
4.2 Disclosure of Personal Information
Radford College may disclose personal information, including sensitive information, held about an individual to:

- another school
- government departments
- medical practitioners
- people providing services to the College, including specialist visiting teachers and sport coaches
- recipients of College publications, like newsletters and magazines
- parents
- anyone, in addition to the above, to whom you authorise the College to disclose information
- anyone to whom we are required to disclose the information by law.

Such information would only be shared where it is legal to do so and only if necessary for the College to fulfil its functions or its legal obligations, including those of duty of care. Where personal information is shared with a third party, only the information that needs to be disclosed is shared, not necessarily all information relating to that person.

Upon enrolment at the College, permission will be sought from parents/carers for information and related photographs regarding academic and sporting achievements, student activities, excursions and events to be published in newsletters, the annual report, prospectus, and Radford on Line.

4.2.1 Sending Information Overseas
The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with ‘cloud’ service providers which are situated outside Australia or 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 consent will be implied) or
- otherwise complying with the Australian Privacy Principles or other privacy legislation.

4.3 Management 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 agreed by the individual, or the use or disclosure of the sensitive information is allowed by law.

Radford College and its staff 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, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and security protected access rights to computerised records.

All personal information which is stored electronically is stored on servers within Australia.

4.3.1 Updating Personal Information
Radford 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 Main Reception staff.

The Australian Privacy Principles require the College not to store personal information longer than necessary.

4.3.2 Access and Correction of Personal Information
Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which Radford 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. Students will generally have access to their personal information through their parents, but older students may seek access themselves.

To access personal information that Radford College holds an individual should contact the Principal in writing.
4.4  Consent and Rights of Access to the Personal Information of Students

Radford College respects every parent’s right to make decisions concerning their child’s education. Generally, Radford College will refer any requests for consent and collection notices in relation to the personal information of a student to the student’s parents. Radford 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 Radford 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 the parents. This would normally be done only when the maturity of the student and/or the student’s personal circumstances so warranted.

The College will provide school reports to non-custodial parents in most circumstances. However, there may be exceptions, such as where court protection orders against a parent are in operation and do not permit the College to provide reports to that parent.

To access personal information that the College holds, an individual should contact the Principal in writing, including verification of identity and outline the specific information required. The College may charge a fee to cover the cost verifying the application and locating, retrieving, reviewing and copying any material requested. If the College is unable to provide access to the information sought, it will provide the applicant with written notice explaining the reasons for refusal.

4.5  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 Chief Operating Officer. The College will investigate any complaint and will notify you of the decision in relation to the complaint as soon as practicable.

5  Related Policies/Further Information:

- Code of Conduct
- Discrimination, Harassment, Bullying and Grievance Policy

6  Legislation/References:

- Privacy Act 2988
- Privacy Amendment (Enhancing Privacy Protection) Act 2012
- Children and Young People Act 2008 (ACT)
- Health Records (Privacy and Access) Act 1997 (ACT)
- Workplace Privacy Act 2011
- Working with Children and Young People – Volunteering – ACT Government Policy

7  Version Control and Change History:

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<th>Principal Approval</th>
<th>Amendment</th>
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<td>April 2014</td>
<td>Executive</td>
<td>Updated.</td>
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