

PRIVACY POLICY

Date Approved:	22/11/2018
Date Effective:	22/11/2018
Scheduled Review Date:	21/11/2023
Policy Category:	Governance and Risk Management
Policy Owner:	Principal

Context

This policy sets out the personal information handling practices of SEDA College SA ('SCSA' or 'the College') and assists SCSA to manage personal information in an open and transparent way. This policy gives students, staff and all those engaging with SCSA a better and more complete understanding of the types of personal information that the College holds and the way that the College handles that information.

SCSA is bound by the Australian Privacy Principles contained in the *Commonwealth Privacy Act 1988*.

Application

This policy applies to:

- Personal information collected or handled by SCSA.
- Students and staff.

A reference to staff includes contractors and volunteers.

Under the *'Commonwealth Privacy Act 1988'*, the Australian Privacy Principles do not apply to an employee record. Consequently, this policy does not apply to an employee record when directly related to a current or former employee.

Policy Content

What is Personal Information?

Personal information is information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

What Kinds of Personal Information?

The kinds of personal information that SCSA may collect and hold about an individual includes, but is not limited to:

- Name
- Address
- Telephone number
- Email address
- Photographs
- Bank account details
- Assessment results
- Sex
- Marital status; and
- Parent/guardian details.

SCSA collects information about students on behalf of it's VET providers according to the requirements of the '2016 VET Funding Contract (Standard)', 'VET Guidelines 2015', 'Higher Education Support Act 2003'. SCSA also collects data from stakeholders about the services provided by SCSA. These surveys are voluntary and respondents may exercise their right of anonymity.

What is Sensitive Information?

Sensitive information is personal information about an individual's racial or ethnic origin, political opinions, membership or political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, sexual preferences, criminal record or health information.

What Kinds of Sensitive Information?

The kinds of sensitive information that SCSA may collect and hold about an individual includes but is not limited to:

- Health or disability information
- Racial or ethnic origin; or
- Working with children check information

How SCSA Collects Personal Information

It is usual practice for SCSA to collect personal information directly from the individual. In many circumstances the student's parent/carer will be required to have input (most commonly this is for students under the age of 18 years).

Sensitive information will only be collected with the individual's consent and where the collection is reasonably necessary for one or more of SCSA's functions or activities (unless a legal exemption applies).

The Purposes for Which SCSA Collects and Uses Personal Information

SCSA will collect, hold, use and disclose personal information about an individual that is reasonably necessary for one or more of its functions or activities.

SCSA's functions or activities include:

- Providing educational services to students in an independent school environment. SCSA's functions or activities are sometimes delivered via enrolment with an external Registered Training Organisation.
- The employment of staff and other related services.
- Reporting to all state or national regulators.
- In circumstances related to public interest, such as law enforcement and public or individual safety.

SCSA is required to provide the State Government, through the Department of Education, with student and training activity data which may include information provided on the enrolment form. Information is required to be provided in accordance with the relevant state/territory '*VET Student Statistical Collection Guidelines*'.

The Department may use the information provided for planning, administration, policy development, program evaluation, resource allocation, and reporting and/or research activities. For these and other lawful purposes, the Department may also disclose information to its consultants, advisers, other government agencies, professional bodies and/or other organisations and take copies of any records or documents as required.

In relation to the personal information of staff, SCSA's primary purpose of collection is to facilitate employment and administer the staff member's benefits and other entitlements.

Who Might SCSA Disclose Personal Information to?

As part of its functions or activities, SCSA may disclose personal information, including sensitive information to other individuals and organisations including:

- A student's parent and/or guardian (unless otherwise requested in writing);
- professional services contractors (including IT consultants, insurers, accountants, lawyers) that assist SCSA to conduct its functions or activities;
- medical practitioners and other healthcare or emergency service providers (in part this falls within the category requiring consent or disclosure by law);
- industry organisations related to the functions or activities of SCSA such as the sports and Building and Trade partners;
- and
- any other individual or organisation SCSA is required to disclose the information to by law.

Sending Information Overseas

SCSA does not usually send personal information about an individual outside Australia. In the unusual event that this occurs, SCSA will comply with the Australian Privacy Principles.

Management and Security of Personal Information

SCSA takes reasonable steps to protect the personal information it holds from interference, misuse, loss, unauthorised access, modification and disclosure. These steps include, but are not limited to locked storage of paper records and security-protected access rights to electronic records. Electronic records are backed up via a cloud service from Telstra.

Survey data is collected in either hard copy or via Survey Monkey (electronic format). SCSA destroys personal information by a secure documents' disposal service.

Updating and Accessing Personal Information

SCSA will take reasonable steps to ensure that the personal information it holds is accurate, complete and up to date. Subject to legal exceptions, an individual may seek access to and seek the correction of personal information SCSA holds about them. Access and correction requests can be made to SCSA directly.

Access by a Parent or Guardian

For a student enrolled in a Senior Secondary Program personal information may be collected, used and disclosed to a student's parent or legal guardian. If the student has sufficient maturity and understanding personal information may be collected, used and disclosed directly with the student.

Before providing information, a staff member must be satisfied:

- Of the identity of the individual seeking the information; and
- That the individual is entitled to access

Complaints & Monitoring

You may complain about a breach of privacy:

- Student concerns, complaints and appeals can be raised under the 'SCSA Concerns, Complaints and Appeals Policy'
- Staff concerns, complaints and appeals can be raised under the 'SCSA Staff Formal Complaint Resolution Process'.

While SCSA encourages its staff and students to raise concerns with SCSA directly, external privacy complaints can be made to the 'Office of the Australian Information Commissioner'.

Referenced Documents

This policy references the following documents:

- Privacy Act 1988 (Commonwealth).
- SCSA Concerns, Complaints & Appeals Policy

This policy has been drafted with reference to the resources of the Office of the Australian Information Commissioner. Further information can be found at <http://www.oaic.gov.au/>

Policy History

Version	Policy Owner	Approval Date	Effective Date	Summary of Changes
V 1.0	Principal	22/11/18	22/11/18	Initial implementation.
V 1.1	Principal	07/09/20	07/09/20	Reviewed. No changes.
V 1.2	Principal	20/01/21	20/01/21	Minor formatting & SCSA Branding

ACKNOWLEDGEMENT

I _____ have read, understood and agree to comply with the terms of this Privacy Policy.

Signed

Date