



# Privacy Policy

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## 1. Scope

This policy outlines how Oxley Christian College ('the School') uses and manages personal information provided to or collected by the School.

Oxley Christian College is a division of Life Ministry Centre Ltd ('LMC'). LMC's operations also encompass other divisions: Oxley Kids; Oxley Stadium; Life Ministry Church; and LMC Head Office. As divisions of LMC, the School and Oxley Kids will share information, as required to facilitate each division's legal and compliance requirements and responsibilities for students and children in each division's care.

## 2. Rationale

The School is bound by the Australian Privacy Principles ('APP') contained in the Commonwealth Privacy Act 1988 and will collect, use and retain personal information, including any sensitive information, in accordance with those Principles. In relation to health records, the School is also bound by the Health Records Act 2001 (Vic) ('Health Records Act').

The School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the School's operations and practices, and to make sure it remains appropriate to the changing LMC and school environments.

### 3. Collection of information

The type of information the School collects and holds, inter alia, personal information, including health and other sensitive information, about:

- students and parents and / or guardians ('Parents') before, during and after the course of a student's enrolment at the School, including:
  - name, contact details (including next of kin), date of birth, sex, language background, previous school and religion;
  - parents' education, occupation and language background;
  - medical 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;
  - court orders;
  - volunteering information; and
  - photos and videos at School events;
- job applicants, staff members, volunteers and contractors, including:
  - name, contact details (including next of kin), date of birth, and religion;
  - information on job application;
  - professional development history;
  - salary and payment information, including superannuation details;
  - medical information (e.g. details of disability and/or allergies, and medical certificates);
  - complaint records and investigation reports;
  - leave details;
  - photos and videos at School events;
  - workplace surveillance information;
  - work emails and private emails (when using work email address) and Internet browsing history.
- other people who come into contact with the School, including name and contact details and any other information necessary for the particular contact with the School.

**Personal Information you provide:** The School will generally collect personal information held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and students provide personal information.

**Personal Information provided by other people:** In some circumstances the School 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:** 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 School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and employee. The School

handles staff health records in accordance with the Health Privacy Principles in the Health Records Act.

**Collection Notices:** The School will issue Collection Notices to inform and seek the consent of students (where applicable), Parents, job applicants, staff members, volunteers, contractors, and other people who come into contact with the School (collectively 'the School community') that the School collects, uses, and retains personal and sensitive information. Copies of the School's Collection Notices have been included in Appendices A, B, C, and D.

#### 4. Purpose of collection and use of personal information

The School 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.

**Students and Parents:** In relation to personal information of students and Parents, the School's primary purpose of collection is to enable the School to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School. This includes satisfying the needs of Parents, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School.

The purposes for which the School uses personal information of students and Parents, inter alia, include:

- to keep Parents informed about matters related to their child's schooling.
- day-to-day administration of the School;
- looking after students' educational, physical, social and medical wellbeing;
- seeking donations and marketing for the School; and
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

In some cases where the School requests personal information about a student or Parent, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the student or permit the student to take part in particular activities.

**Job applicants, staff members and contractors:** In relation to personal information of job applicants, staff members and contractors, the School'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 School uses personal information of job applicants and contractors include, inter alia:

- administering the individual's employment or contract, as the case may be;
- insurance purposes;
- seeking donations and marketing for the School; and
- satisfying the School's legal and contractual obligations, for example, in relation to child protection legislation.

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

**Marketing and fundraising:** The School treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that the

School continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising, for example, the School's Foundation or Past Students Association or, on occasions, external fundraising organisations.

Parents, staff, contractors and other members of the wider School 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.

## 5. Disclosure of information

The School may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the School, including specialist visiting teachers, sports coaches, volunteers, and counsellors;
- providers of specialist advisory services and assistance to the School, including in the area 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) 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;
- people providing administrative and financial services to the School;
- recipients of School publications, such as newsletters and magazines;
- students' parents or guardians;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

**Sending and storing information overseas:** The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, the School 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.

The School may use online or 'cloud' service providers to store personal information and to provide services to the School 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. This personal information may be stored in the 'cloud' which means that it may reside on a cloud-based service provider which may be situated outside Australia.

As an example of a cloud-based service, Typing Tutor is used by the School for digital literacy. Typing Tutor was developed by Edclub Inc. and is hosted in the United States of America. Typing Tutor is a valuable tool that aids in enhancing touch-typing skills, which are essential in today's technology-driven era. To access this service, the School must provide limited, personal student information to Edclub Inc. to enable user authentication.

## **6. Sensitive information**

In referring to 'sensitive information', the School means: information relating to a person's cultural background, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, biological sex, or criminal record, that is also personal information; health information and biometric information about an individual.

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 allowed by law.

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

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

The School has in place steps to protect the personal information the School 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.

## **8. Access to and correction of personal information**

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which the School holds about them and to advise the School 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 update any personal information the School holds about you or your child, please contact the School's Business Manager in writing. The School may require you to verify your identity and specify what information you require. The School 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 School 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.

## **9. Consent and rights of access to personal information of students**

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

Generally, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. The School 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 School about them or their child by contacting the School's Business Manager. 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 School's duty of care to the student.

The School may, at its discretion, on the request of a student, grant that student access to information held by the School 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 so warranted.

#### **10. Notifiable Data Breaches**

In accordance with the Privacy Act, the School is required to notify individuals should their personal information (held by the School) be involved in an eligible data breach. The School has, therefore, established a Data Breach Response Plan to guide the School in the case of a data breach so as to contain any breach, to investigate and evaluate the risks associated with the breach, to provide timely and appropriate notification of the breach, and to prevent future breaches.

#### **11. Enquiries and complaints**

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles, please contact the School's Business Manager. The School 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.

## APPENDIX A

## Standard Collection Notice

1. Oxley Christian College ('the School') collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the School. This may be in writing, through technology systems or in the course of conversations. The primary purpose of collecting this information is to enable the School to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles ('APP') under the Privacy Act 1988. We may ask you to provide medical reports about students from time to time.
5. A student's enrolment may be delayed or prevented if the School cannot collect certain personal information. This is particularly so where the information is relevant to the health and safety of the student, other students and/or staff.
6. The School may disclose personal and sensitive information for educational, administrative and support purposes. 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);
  - medical practitioners;
  - people providing educational, support and health services to the School, including specialist visiting teachers, sports coaches, volunteers, and counsellors;
  - 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 and research purposes;
  - people providing administrative and financial services to the School;
  - anyone you authorise the School to disclose information to; and
  - anyone to whom the School is required or authorised to disclose the information to by law, including child protection laws.
7. Personal information collected from students is regularly disclosed to their parents or guardians.
8. The School uses information management and storage systems (**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 School in connection with the Systems.
9. The School may use online or 'cloud' service providers to store personal information and to provide services to the School 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. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.

10. The School's Privacy Policy, accessible on the School's website and Parent Portal, sets out how parents or students may seek access to and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the student, where students have provided information in confidence or where the School is otherwise required or authorised by law to refuse access. Any refusal will be notified in writing with reasons (unless, given the grounds for refusal, it would be unreasonable to provide reasons).
11. The School Privacy Policy also sets out how parents and students can make a complaint about a breach of the APPs and how the complaint will be handled.
12. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
13. On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, concerts and plays, school camps and school excursions. The School will obtain permissions from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos or other identifying material in our promotional material or otherwise make this material available to the public such as on the internet.
14. The School may include students' and students' parents' contact details in a class list and School directory to enable us to provide the services offered. If you do not agree to this, you must advise the School now.
15. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why.

### **Acknowledgement and Consent**

By signing this Acknowledgement and Consent you are agreeing to the collection and storage of personal information by the School, as described above. Please note that a full copy of the School's Privacy Policy is available on request.

\_\_\_\_\_  
Signature of Parent 1 / Guardian 1

\_\_\_\_\_  
Signature of Parent 2 / Guardian 2

\_\_\_\_\_  
Print Name of Parent 1 / Guardian 1

\_\_\_\_\_  
Print Name of Parent 2 / Guardian 2

Date:

Date:



## APPENDIX B

## Employment Collection Notice

1. In applying for this position you will be providing Oxley Christian College ('the School') with personal information. We can be contacted by mail at 15-49 Old Melbourne Road, Chirnside Park, Vic, 3116, or by email at office@oxley.vic.edu.au, or by telephone on (03) 9727 9900.
2. We collect your personal information directly from you (for example, your name and address or information contained on your resume). [We may also collect it from other sources (such as your referees and the results of criminal background and working with children checks). We may keep this information on file for a limited time if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to, and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others or where the School is otherwise required or authorised by law to refuse access. Any refusal will be notified in writing with reasons (unless, having regards to the grounds for refusal, it would be unreasonable to provide reasons).
4. We will not disclose information to a third party without your consent unless otherwise permitted. We may disclose this kind of information to organisations, such as support vendors that provide services around staff administration systems.
5. You may be required to provide the School with a criminal record check and a Working With Children Check. The School may also be required to collect personal information about you in accordance with Child Protection and other relevant laws.
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

### Acknowledgement and Consent

By signing this Acknowledgement and Consent you are agreeing to the collection and storage of personal information by the School, as described above. Please note that a full copy of the School's Privacy Policy is available on request.

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Signature

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Print Name

Date:

## APPENDIX C

## Contractor / Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to Oxley Christian College ('the School'), you will be providing the School with personal information. We can be contacted by mail at 15-49 Old Melbourne Road, Chirmside Park, Vic, 3116, or by email at [office@oxley.vic.edu.au](mailto:office@oxley.vic.edu.au), or by telephone on (03) 9727 9900.
2. We collect your personal information directly from you (for example your name and address or information contained on your resume. We may also collect it from other sources (such as your referees and the results of criminal background and working with children checks). We collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for 12 months (from the date of collection).
4. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others or where the School is otherwise required or authorised by law to refuse access. Any refusal will be notified in writing with reasons (unless, given the grounds for refusal, it would be unreasonable to provide reasons).
5. We will not disclose this information to a third party without your consent unless otherwise permitted to. We may disclose this kind of information to organisations, e.g. support vendors that provide services around administration systems.
6. You may be required to provide the School with a criminal record check and a Working With Children Check. The School may also be required to collect personal information about you in accordance with Child Protection and other relevant laws.
7. The School may use online or 'cloud' service providers to store personal information and to provide services to the School 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. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
8. If you provide the School with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

### Acknowledgement and Consent

By signing this Acknowledgement and Consent you are agreeing to the collection and storage of personal information by the School, as described above. Please note that a full copy of the School's Privacy Policy is available on request.

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Signature of Contractor / Volunteer

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Print Name of Signatory

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Print Name of Contractor (if not an individual)

Date:

## APPENDIX D

### Past Students Association Collection Notice

1. The Past Students Association ('the Association') may collect personal information about you from time to time. The primary purpose of collecting this information is to enable the Association to inform you about our activities and the activities of Oxley Christian College ('the School') and to keep the Association's members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the Association.
3. From time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the School to assist in its fundraising activities. If you do not agree to this, please advise us now.
4. The Association may publish details about you in our publications and the School's website. If you do not agree to this you must advise us now.
5. The School's Privacy Policy, accessible on the School's website, contains details of how you may seek access to and correction of your personal information collected about you which the School has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

#### **Acknowledgement and Consent**

By signing this Acknowledgement and Consent you are agreeing to the collection and storage of personal information by the Association, as described above. Please note that a full copy of the School's Privacy Policy is available on request.

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Signature

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Print Name

Date: