Privacy Policy

Policy Statement

Rowville Secondary College is committed to a strict privacy policy. All staff are required by law to protect the personal and health information the School collects and holds. The Victorian privacy laws, the Information Privacy Act 2000 and Health Records Act 2001, provide for the protection of personal and health information. The privacy laws do not replace any existing obligations that Rowville Secondary College has under other laws.

Definitions

Personal information means information or opinion that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be determined from the information or opinion. For example this includes all paper and electronic records, photographs and video recordings.

Health information is defined as including information or opinion about a person’s physical, mental or psychological health, or disability, which is also classified as personal information. This includes information or opinion about a person’s health status and medical history, whether recorded or not.

Sensitive information is defined as 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 that is also classified as personal information about an individual.

In this policy personal information refers to personal information, health information and sensitive information unless otherwise specified.

1. Guidelines

1.1 The school will only collect information that is necessary for the performance of its functions

1.2 The school will use and disclose personal information only for the primary purpose for which it was collected or a secondary purpose the person would reasonably expect (and it may then require their consent).

2. Program

2.1 Personal Information is collected and used by Rowville Secondary College to:
- provide services or to carry out the School statutory functions,
- assist the School services and its staff to fulfil its duty of care to students,
- plan, resource, monitor and evaluate School services and functions,
- comply with DEECD reporting requirements,
- comply with statutory and or other legal obligations in respect of staff,
- investigate incidents or defend any legal claims against the School, its services or its staff, and
- comply with laws that impose specific obligations regarding the handling of personal information.

2.2.1 Rowville Secondary College will only use or disclose personal information:
- for the primary purpose for which it was collected
- for a related secondary purpose that the person would reasonably expect (for example it is necessary to lessen or prevent a
serious or imminent threat to life, health or safety)
• with the consent of the person
• unless otherwise, permitted or authorised by law.

The school will use and disclose personal information about a student, parent and staff when:
• it is required for general administration duties and statutory functions
• it relates to the purposes for which it was collected, and
• for a purpose that is directly related to the reason the information was collected and the use would be reasonably expected by the individual and there is no reason to believe they would object to the disclosure.

The school can disclose personal information for another purpose when:
• the person consents, or
• it is necessary to lessen or prevent a serious or imminent threat to life, health or safety, or
• it is required by law or for law enforcement purposes.

Where consent for the use and disclosure of personal information is required, the school will seek consent from the appropriate person. In the case of a student’s personal information, the school will seek the consent from the student and/or parent depending on the circumstances and the student’s mental ability and maturity to understand the consequences of the proposed use and disclosure

2.2.2 The purposes for which Rowville Secondary College uses personal information of students and parents include:
1. Guidelines

1.3 The school will endeavour to make sure that personal information is accurate, complete and up to date.

1.4 The school will take reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure.

2. Program

- keeping parents informed about matters related to their child’s participation in school events
- celebrating the efforts and achievements of students
- day-to-day administration
- satisfying the school’s legal obligations, and
- allowing the school to discharge its duty of care.

2.2.3 The purposes for which Rowville Secondary College uses personal information of job applicants, staff members and contractors include:

- assessing the suitability for employment
- administering the individual’s employment or contract,
- for insurance purposes, such as public liability or WorkCover,
- satisfying legal requirements, and
- investigating incidents or defending legal claims in consultation with DEECD about Rowville Secondary College, its services or staff.

2.2.4 Rowville Secondary College will use and disclose personal information about a student, parent and staff when:

- it is required for general administration duties and statutory functions,
- it relates to the purposes for which it was collected, and
- for a purpose that is directly related to the reason the information was collected and the use would be reasonably expected by the individual and there is no reason to believe they would object to the disclosure.

2.3.1 All records will be maintained by administrative staff.

2.3.2 The School aims to keep personal information it holds on staff accurate and complete. A staff member may update their personal information by contacting the Business Manager.

2.4.1 Rowville Secondary College has in place steps to protect the personal information the school holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and pass worded access rights to computerised records.

2.4.2 All relevant information and records relating to students (eg: enrolment forms, consent forms, assessments, psychological reports, academic reports etc) will all be retained in secure storage in administration.

2.4.3 All electronic data will be maintained, stored and transmitted in accordance with DEECD requirements and expectations.
1.5 The school will document clearly all process/procedures on the management of personal information and provide these on request to anyone that asks.

1.6 The school acknowledges the right of individuals to seek access to their personal information and to make corrections.

1.7 Celebrating the efforts and achievements of our students and staff is an important aspect of our school’s culture; however the privacy of the individual must be respected and maintained.

1.8 The school will ensure the use of information communication technology (ICT) does not breach privacy requirements.

2.4.3 All collected information at our school will be retained in either a fireproof safe (in the case of staff), or in the secure storage in administration as appropriate, or either disposed of or transferred to the Public Record Office of Victoria after use consistent with the Public Record Office Standard (PROS) 01/01.

2.5 If additional information about this policy is required or about how Rowville Secondary College complies with the privacy legislation then contact should be made with the Business Manager or a member of the Principal Team

2.6.1 A parent, student or staff member may seek access to their personal information, provided by them, that is held by the School.

2.6.2 Access to some information may be restricted according to the requirements of laws that cover the management of school records. These include the Public Records Act and the Freedom of Information Act.

Updating personal information:
The school aims to keep personal information it holds accurate, complete and up-to-date. A person may update their personal information by contacting the nominated office staff member at each campus. The name of the person will from time to time be given to staff as a reminder.

2.7.1 The celebration of the efforts of students and staff will be acknowledged freely in the school’s newsletter, school magazine, school displays and the school’s intranet site. It will occasionally involve the photo images of students and staff.

2.7.2 Where the celebration of student achievement in the external media that is not of a group or team nature will require individual permission from parents/carers to use a student’s image and full name for publication.

2.7.3 Photographs of students will be used on the school’s website however students will not be identified by name.

2.8.1 School staff and students have use of information communication technologies (ICT) provided by the School and must comply with Privacy requirements. This use is directed by:

- DEECD’s Acceptable Use policy for Internet, email, and
- other electronic communications
- DEECD’s IT Security Policy
- Upwey High School’s Internet Use Policy

2.8.2 The Internet and email are insecure means of transmitting information. Therefore, items of a highly confidential or sensitive nature should not be sent via email.
| 1.9 | The school will ensure that the privacy of personal information will be protected if it is required by another section of the DEECD, including another school as a result of a transfer. |
| 2.9.1 | The Privacy Act allows each school, being legally related to each of the other schools conducted by the DEECD to share personal (but not sensitive) information with other schools conducted by the DEECD. Other DEECD schools may then only use this personal information for the purpose for which it was originally collected by the DEECD. This allows schools to transfer information between them, for example, when a pupil transfers from Upwey High School to another school conducted by the DEECD. |
| 1.10 | The school restricts the collection of sensitive information and will not seek information about a person’s racial or ethnic origin, political views, religious beliefs or sexual preferences. |
| 2.9.2 | Upwey High School will not send personal information about an individual interstate or outside Australia without:  
- obtaining the consent of the individual (in some cases this consent will be implied); or  
- otherwise complying with the National Privacy Principles. |
| 1.11 | It is important that all members of Rowville Secondary College have an awareness of the Privacy guidelines. |
| 2.10 | The Information Privacy Act 2000 restricts collection of sensitive information about an individual’s racial or ethnic origin, political views, religious beliefs, sexual preferences, membership of groups or criminal record. |
| 2.11 | All staff at Rowville Secondary College will be provided with up to date professional learning in relation to Privacy, will be provided with and made aware of Department of Education and Early Childhood (DEECD) Privacy guidelines and other information as it becomes available, and will be made aware of, and reminded of their individual and our collective duty of care regarding Privacy as required. |
| 2.12 | Should the school receive a complaint about personal information privacy this will be investigated in accordance with DEECD’s Privacy Complaints Handling Policy by the Principal or their delegate. |
Links
http://www.rowvillesc.vic.edu.au
privacy.enquiries@edumail.vic.gov.au

Evaluation
This policy will be reviewed as part of the school’s 3 year review cycle or as required by developments/changes in relevant legislation on DEECD practice.

Review Date: March 2015
Appendix A – Rowville Secondary College Privacy Statement

1. Rowville Secondary College 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. The primary purpose of collecting this information is to enable the School to provide schooling for your child/children.

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. Certain laws governing or relating to the operation of schools require that certain information is collected.

4. Health information about pupils is sensitive information within the terms of the National Privacy Principles under the Privacy Act. We ask you to provide medical reports about your child/children from time to time.

5. Rowville Secondary College, from time to time, discloses personal and sensitive information to others for administrative and educational purposes. These include, but are not limited to, other educational institutions, government departments, medical practitioners, and people providing services to the school, including specialist visiting teachers, sports coaches and volunteers.

6. If we do not obtain the information important to the school, as referred to above, we may not be able to enrol or continue the enrolment of your child/children.

7. Personal information collected from students is regularly disclosed to their parents or guardians. On occasions, information, such as academic and sporting achievements, student activities and other news, is published in School newsletters, magazines and on our website. Such information may be in either or both print and photographic format.

8. As part of the school’s publicity activities there may, on occasion, be situations whereby Rowville Secondary College or local media will take photographs and/or video footage of your child/children for publication in newspapers. Rowville Secondary College will seek your written permission to feature in such publicity.

9. Parents/guardians may seek access to personal information collected about them and their child/children by contacting the school. Students may also seek access to personal information about them. Access will be by formal request to the Principal. However, there will be occasions when access is denied. Such occasions would include 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 pupil, or where pupils have provided information in confidence.

10. Rowville Secondary College, from time to time, engages in fundraising activities. Information received from you may be used to make an appeal to you. [Such information may be disclosed to organisations which assist in the school’s fundraising activities and be disclosed solely for that purpose]. We will not disclose your personal information to third parties for their own marketing purposes without your consent.

11. If you provide the school with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.
Appendix B - An Overview of Privacy at Rowville Secondary College

Introduction
Rowville Secondary College is bound by the National Privacy Principles contained in the Commonwealth Privacy Act. The school may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to schools' operations and practices, and to make sure the policy remains appropriate to the changing school environment.

What kind of personal information does a school collect and how does a school collect it?

The type of information schools collect and hold includes (but is not limited to) personal information, including sensitive information, about:

- pupils and parents and/or guardians (“Parents”) before, during and after the course of a pupil’s enrolment at the school;
- job applicants, staff members, volunteers and contractors; and
- other people who come into 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 pupils, face-to-face meetings and interviews and telephone calls. On occasions people other than parents and pupils 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 National 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.

How will a school use the personal information you provide?
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, or to which you have consented.

Pupils and Parents:
In relation to personal information of pupils and Parents, the school's primary purpose of collection is to enable the school to provide schooling for the pupil. This includes satisfying both the needs of Parents and the needs of the pupil throughout the whole period the pupil is enrolled at the school. The purposes for which the school uses personal information of pupils and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after pupils' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the school;
- to satisfy the school's legal obligations; and
- allow the school to discharge its duty of care.
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, staff member or contractor, as the case may be.
The purposes for which a school uses personal information of job applicants, staff members and contractors include:
- administrating the individual's employment or contract, as the case may be;
- insurance purposes;
- seeking donations and promotion of the school;
- to satisfy the school's legal obligations, for example, in relation to child protection legislation.

Volunteers:
The school also 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.

Promotion of the School:
Promotion of the school helps ensure its future growth and development. It is an important part of ensuring that the school continues to be a quality learning environment in which both pupils and staff thrive. 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.

Exception in relation to related schools:
The Privacy Act allows each school, being legally related to each of the other ad DEECD to share personal (but not sensitive) information with other DEECD schools. Other government schools may then only use this personal information for the purpose for which it was originally collected by the DEECD. This allows schools to transfer information between them, for example, when a pupil transfers from one government school to another.

Who might a school disclose personal information to?
The school may disclose personal information, including sensitive information, held about an individual to:
- another school;
- government departments;
- your local parish;
- medical practitioners;
- people providing services to the school, including specialist visiting teachers and sports coaches;
- recipients of school publications, like newsletters and magazines;
- Parents; and
- anyone you authorise the school to disclose information to.

Sending information overseas:
The school will not send personal information about an individual outside Australia without
- obtaining the consent of the individual or their parent/guardian (in some cases this consent will be implied); or
- complying with the National Privacy Principles.

How does a school treat sensitive information?
In referring to 'sensitive information', the school means: 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, that is also personal information; and health 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.
Management and security of personal information
Rowville Secondary College’s staff are required to respect the confidentiality of pupils' 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, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and pass worded access rights to computerised records.

Updating personal information
Rowville Secondary College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update his/her personal information held by a school by contacting a member of the Administration Team of the school at any time.
The National Privacy Principles require the school not to store personal information longer than necessary.

You have the right to check what personal information a school holds about you
Under the Commonwealth Privacy 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. There are some exceptions to this right set out in the Act. Pupils will generally have access to their personal information through their Parents, but older pupils may seek access themselves.
To make a request to access any information the school holds about you or your child, please contact the Principal 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.

Consent and rights of access to the personal information of pupils
Rowville Secondary College 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 pupil to the pupil’s Parents. A school will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil. Parents may seek access to personal information held by the school 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 school's duty of care to the pupil. The school may, at its discretion, on the request of a pupil grant that pupil access to information held by the school about them, or allow a pupil 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 pupil and/or the pupils' personal circumstances so warranted.

Enquiries
If you would like further information about the way the school manages the personal information it holds, please contact the school's Business Manager.
Websites

Information Collected
Rowville Secondary College web and web server makes a record of: (insert information that website makes a record of). This will be different for every school. Examples include a visit and the following information logged for statistical purposes:

- the Internet protocol (IP) address of the machine from connecting to the website
- the top level domain name (for example .com, .gov, .au, .uk etc.)

Complaints under privacy
Should the school receive a complaint about personal information privacy this will be investigated with the Department of Education Training’s privacy complaints handling policy