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Belong to
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Privacy Policy P

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Privacy Policy

Purpose

Ilim College is legally obligated to safeguard the personal and health information of its staff and students. The Victorian Privacy laws, namely the information Privacy Act 2000 and the Health Records Act 2001, are in place to provide this protection for personal and health information. It's important to note that these Privacy Laws do not override any other legal obligation that Ilim College may have.

Aim

The primary aim of this policy is to ensure that all staff and school operations prioritise the privacy of students, staff, and parents' personal information. The term "personal information" in this policy encompasses health information and sensitive information, unless specifically stated otherwise. This policy comes into effect when other laws do not adequately regulate the use of personal information.

Scope

This policy applies to all Ilim College employees, students, parents/guardians, any independent contractor and an employee of any independent contractor engaged by Ilim College.

Definitions

Personal Information

Personal information refers to any data or viewpoint, whether accurate or not, that pertains to an identifiable individual or allows their identification through the data or viewpoint. This encompasses a wide range of mediums such as paper and digital records, photographs, and video recordings. Common examples are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details and commentary or opinion about a person.

Health Information

Health information pertains to an individual's physical, mental, or psychological well-being, as well as any disabilities they may have. It falls under the category of personal information and encompasses details or viewpoints regarding a person's health and medical history, whether documented or not.

Sensitive Information

Sensitive information refers to data concerning an individual's racial or ethnic background, political beliefs, religious affiliations, trade union or professional memberships, sexual preferences, or criminal record. This type of information is also classified as personal information as it directly relates to an individual's personal characteristics and private matters.

Parent

Is a relation to a child which encompasses various roles, such as stepparent, adoptive parent, foster parent, guardian, or any individual with custody or daily responsibilities for the care and control of the child.

Staff

Staff at Ilim College refers to individuals who perform duties on behalf of the college, whether they are paid or unpaid, and includes those who are contracted or directly employed by the institution. Additionally, information from employment applications is also classified as staff information.

Student

Students at Ilim College refers to individuals who are engaged in learning, participate in educational activities, courses, and programs with the goal of acquiring knowledge, skills and qualifications in various subjects or fields of study.

Implementation

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Employees are responsible for promptly updating their personal address, contact numbers and other relevant details on Action HRM, which serves as the centralised platform for managing employee information. Timely updates on Action HRM software enable the organisation to maintain accurate records to maintain data integrity, support smooth HR operations and facilitate efficient communication.

What personal information is collected?

The information Ilim College will gather is contingent upon your relationship and interactions with the college. The College may collect information pertaining to the following:

- ▶ Students, parents/legal guardians
- ▶ Our employees, contractors, volunteers, casual employees, and prospective employees,
- ▶ Our suppliers and their employees, and
- ▶ Other individuals who have contact with the college.

Typically, we collect and retain data such as names, date of birth, contact details, passport details, company name, payment details, employment history, education and qualifications, working with children check, VIT registration, testimonials, feedback, and other relevant information to support our educational services, college marketing, compliance with legal and regulatory requirements. Additionally, the college may collect sensitive information, including health details, membership in professional associations, or religious affiliations.

Furthermore, when you visit Ilim College website, we may collect non personal information from our browser, such as the website you accessed from, your location information, IP address, and the date and time of your visit.

How we gather Information.

The College gathers information through various means which include:

- ▶ Face to face meetings, interviews, and telephone conversations.
- ▶ Correspondence
- ▶ Employment applications to the College
- ▶ Inquiries received via telephone, email, or the college website.
- ▶ Paper or online forms completed by parents, students, and employees.
- ▶ Visitors sign in at campus receptions.
- ▶ Information obtained from third parties, such as reports from medical professionals or references from other colleges,
- ▶ Photographs or videos of students, employees, and college community members during functions and events,
- ▶ The use of cookies on our website to enhance user preferences,
- ▶ Utilising third party providers to manage event registrations.
- ▶ Engaging third party platforms to conduct surveys on matters relevant to the college.
- ▶ Utilising third party platforms to analyse traffic on our website and social media platforms.
- ▶ Gathering information indirectly through publicly available sources.

Regarding social networking services such as Twitter, Facebook and Instagram, the college use these platforms to communicate news with the broader college community and the public.

Please note, that these social networking services handle personal information for their own purposes and have their own privacy policies available on their respective websites.

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Additionally, the college handles employee health records in compliance with the Health Privacy Principles outlined in the Health Records Act.

Purpose of Collecting Information

At all times, the college endeavours to utilise the personal information it collects solely for the specific function or activity it is required for. However, on occasion, we may also employ that information for related secondary purposes.

Students and Parents/ Legal Guardians

The retention of personal information enables the college to provide exceptional education for our students including:

- ▶ Managing day to day administrative tasks and statutory functions efficiently.
- ▶ Keeping parents/ legal guardians well informed about their child's progress,
- ▶ Ensuring the overall educational, social, and medical well-being of our students.
- ▶ Engaging in fundraising efforts and marketing initiatives for the college.
- ▶ Fulfilling our legal obligations and responsibly discharging our duty of care towards of students.

Job Applicants, Employees and Contractors

The college gathers personal information of job applicants, employees, and contractors for the following purposes:

- ▶ Evaluating suitability for employment.
- ▶ Managing individual employment or contract-related matters.
- ▶ Facilitating insurance- related purposes, such as public liability or Work Cover.
- ▶ Satisfying the colleges legal requirements and investigating incidents or defending legal claims concerning the college, its services, or its employees. (For example, in relation to child protection legislation.)

Volunteers

Gathering information is vital to support our functions and associated activities, as well as to fulfill our legal obligations, such as adhering to child protection legislation.

Legal Requirements

To satisfy the college's legal obligation such as Child protection and safety obligations.

Sensitive Information

The college also collects sensitive information, encompassing details related to health, disability, racial or ethnic origin, religious, political or philosophical beliefs, professional association or trade union memberships, sexuality, or criminal record.

The college will refrain from collecting sensitive information about you unless you explicitly consent to the collection, it is reasonably necessary for our operations, in the interest of the child's development, or it is required by law.

Any sensitive information collected by the college will only utilised and disclosed for the primary purpose for which it was provided or for a purpose directly connected to the primary objective. The use or disclosure of this sensitive information must be necessary to support the college's functions or activities or when permitted by law.

Surveillance Camera's

The College has surveillance cameras on campuses for various reasons:

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- ▶ **Security and Safety:** Assist to deter and prevent unauthorised individuals from entering the college premises, thereby enhancing the overall security of students, staff and property.
- ▶ **Preventing and Investigating Incidents:** Serves as a means to prevent and address incidents such as bullying, fights, vandalism, and theft.
- ▶ **Emergency Response:** Assist during emergency situations, lockdowns, natural disasters, or medical incidents.
- ▶ **Legal Protection:** Can provide documentation in case of accidents, injuries, or disputes, which can help protect the college from legal liabilities.

Surveillance cameras are strategically placed throughout the campuses of the college, accessible exclusively to Campus Principals, Vice Principals, Business Managers and the Security Infrastructure Manager.

The cameras operate without monitoring, and the footage is only accessed in the event of reported incidents.

The College utilises the surveillance cameras on its campuses in line with the regulations outlined in the Surveillance Devices Act 1999.

Disclosure of Personal Information

The college will only disclose personal information if any of the following conditions are met:

- ▶ Consent has been provided.

Where consent for the disclosure of personal information is required, the college will:

- Seek consent from the appropriate individual.
- Situations concerning students' personal information- the college will request consent from both the student and/or the parent/guardian depending on the circumstances, as well as the

student's mental capacity and level of maturity to comprehend the implications of the proposed disclosure.

- The college will typically seek consent from the students' parents and consent given by the parents will be regarded as consent on behalf of the student.
- ▶ It is reasonable to expect that the college would use or disclose the information in that particular manner.
- ▶ Authorised or compelled to do so by law.
- ▶ To reduce or prevent a serious threat to the life, health, or safety of an individual or to public safety.
- ▶ Allowable general situation or permitted health situation exception is applicable.

Ilim College may disclose relevant parts of your personal information to:

- ▶ Appropriate employees of Ilim College where access to that information is relevant to the employment relationship.
- ▶ Organisations such as the Victorian Workcover Authority, Rehabilitation Providers, Superannuation organisations where release of that information is relevant to the proper work of the particular organisation.
- ▶ Financial organisations nominated by you for the deposit of your salary.
- ▶ Other organisations nominated by you for other salary deductions.
- ▶ Courts or law enforcement agencies as required by a summons, subpoena, or other document.
- ▶ Educational regulatory bodies such as VIT for the purpose of qualification and associated classifications.
- ▶ Government departments such as CCYP, DHHS, Victoria Police.
- ▶ Another college

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- ▶ Medical practitioners
- ▶ Individuals providing services to the college, such as visiting specialists, teachers, and sports coaches, including third party providers assisting with the college's compliance and legal obligations.
- ▶ Recipients of the college's publications, such as newsletters and magazines.
- ▶ Newspapers
- ▶ Parent association/committees
- ▶ Other third parties if you have given consent for the disclosure.

Non-Disclosure of Personal Information

- ▶ Ilim College will not disclose personal information to organisations such as:
 - Direct marketing agencies.
 - Financial institutions seeking information in connection with a loan application etc. (unless prior request and consent is given by the individual). We will provide that information to you as an employee for use as you see fit. We will confirm your employment with Ilim College to financial institutions.

Management and security of personal and sensitive information.

Ilim College employees must uphold the confidentiality and privacy of Employees', students', and parents/ legal guardians' personal information.

We have established procedures to safeguard the personal and sensitive information we possess. These measures aim to prevent misuse, interference, loss, unauthorised access, modification, or disclosure. The

protection methods include, storing paper records in locked facilities and implementing password-protected access rights for online records.

In cases where the college no longer requires your personal information, we will take appropriate action to either destroy it securely or de-identify it.

Student and employee records are archived according to the Australian Record Management and Retention Guidelines to ensure their availability for future inquiries and historical purposes.

Updating Personal Information

The college strives to maintain accurate, complete, and up to date personal information in its possession. If an employee wishes to update their personal details, they can do so by reaching out to the Human Resources department.

If a parent/ guardian wishes to update any personal details, they must obtain an "Update Details Form" from the administrative officers at their child's campus, complete the form and return it to the administration office for processing as soon as possible.

Parents and employees are responsible for ensuring that their personal address and telephone numbers are promptly updated to avoid potential risks to safety.

Accessing Personal Information.

You have the right to request access to your personal and sensitive information and to inform the college of any necessary corrections. However, there are circumstances where access may be denied, such as when releasing the information could unreasonably impact the privacy of others or breach our duty of care to a student.

If you wish to access any information we hold in relation to a college employee, student, or

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member of college community, you can make a written request to info@ilimcollege.vic.edu.au. The college may request you to verify your identity and specify the information you wish to view. Please note it may take up to 20 working days to make the information available. Unauthorised Access, Use or Disclosure

The College takes the security of personal information very seriously and respond promptly to any unauthorised access, use or disclosure of such data. To prevent unauthorised incidents, the college implements the following measures:

- ▶ Regularly assessing the risks of unauthorised access, use, or disclosure and taking appropriate actions to address those risks.
- ▶ Reporting risks to the Leadership Team and implementing necessary corrective measures to mitigate potential risks.
- ▶ Ensuring information is destroyed in accordance with the documents retention guidelines when it is no longer required.

Under the Notifiable Data Breaches Scheme, the college is obligated to notify you if your information is involved in an eligible data breach likely to cause serious harm. Additionally, the Office of the Australian Information Commission is informed of the breach.

In case of a suspected or actual data breach, the college follows the steps outlined in our Data Breach Response Plan to handle the situation appropriately.

Making a Complaint

If you suspect that the college has breached our obligation under the Australian Privacy Principles, please submit a written complaint to info@ilimcollege.vic.edu.au. The complaint

should include all details so that an assessment can be made to determine whether a breach has occurred.

Upon receiving your complaint, the college will respond within a reasonable timeframe. During our response, we will investigate whether a breach indeed occurred and, if so, take appropriate measures in light of the circumstances.

If you feel that your complaint was not adequately addressed by us, you have the option to lodge a further complaint with the Australian Information Commission. The matter will then be handled through conciliation. In the event that a resolution cannot be reached, the Australian Information Commission may issue a binding determination that is enforceable by law.

Before reaching out to the Australian Information Commission, we encourage you to try resolving the complaint directly with the College first.

Review

This policy will be reviewed in line with Iljim College's three-year review schedule.

Related Documents

- Data Breach Response Plan
- Complaints and Grievances Policy
- Australian Record Management and Retention Guidelines.