



## PRIVACY POLICY

### PURPOSE

This Privacy Policy sets out how Matthew Flinders Anglican College ('the College') uses and manages personal information provided to or collected by it, and contact details in the event of any privacy concerns. The College is bound by the *Australian Privacy Principles* (APPs) which are outlined in the *Privacy Act 1988* (Cth) (Privacy Act). This policy outlines how the College collects, uses, holds and discloses personal information (eg. name, contact details, date of birth, gender, language background etc.).

### SCOPE

This policy applies to the Board of Directors, Committee Members, employees, volunteers, parents, students, and people visiting College property. This policy outlines how the College collects, uses and discloses relevant information. Please refer to the [linked 'Privacy Collection Notice'](#) for specific details regarding privacy in relation to students and their parents.

Exception in relation to employee records: Under the *Privacy Act*, the APPs do not apply to an employee record held by the employing entity. 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 the employee.

### RESPONSIBLE PERSON

Director of Business and Operations

### DEFINITIONS

Parent means the legal guardian of the child and/or a person who exercises parental authority. Parental authority is defined in the *Family Law Act 1975* (Cth) and means the duties, powers, responsibilities, which by law, parents have in relation to their children.

Student means all current, prospective and past students.

### LEGISLATION

*Australian Privacy Principles*

*Privacy Act 1988* (Cth)

*Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth)

*Child Protection Act 1999* (Qld)

*Information Privacy Act 2009* (Qld)

#### 1. What is Personal Information?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information, or an opinion, may be personal information regardless of whether it is true.

#### 2. What kinds of personal information does the College Collect?

The College will collect different types of personal information from you, depending on how you interact with the College. The type of information the College collects and holds includes (but is not limited to) personal information, sensitive information and health information about:

- Students 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.

Sensitive information is a type of personal information including information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious belief or affiliation, philosophical belief, membership of a professional or trade association, membership of a trade union, sexual preference or practice, criminal record, health information and biometric information about an individual.

The College will only collect sensitive information, where it is reasonably necessary for one or more of the College's functions or activities, and will only be collected with consent, unless one of the exceptions under the APPs applies.

#### Personal information you provide

The College will generally collect personal information about an individual by way of forms filled out by College personnel, parents and/or guardians, students, face-to-face meetings and interviews, telephone calls, CCTV security cameras and ID scanning. Other individuals may also provide personal information in their dealings with the College. The College undertakes ID scanning for the purposes of pre-employment screening and to satisfy the requirements of the *Working with Children (Risk Management and Screening) Act 2000*.

CCTV security video surveillance is undertaken in accordance with the College's Security Video Surveillance Policy, in conjunction with this Privacy Policy.

#### Personal information collected from third parties

In some circumstances the 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 organisation. Collection of personal information from a third party will only be undertaken where it is reasonably necessary to fulfill and pursue a legitimate function of the College. Any personal information that is unsolicited will be dealt with in accordance with the APPs and the *Privacy Act 1988 (Cth)*.

### **3. How will the College use the personal information you provide?**

The College will use personal information (including sensitive 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.

In relation to personal information of parents and students, the College's primary purpose of collection is to enable the College to provide schooling for the student. This includes satisfying the needs of parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled and at the College.

The purposes for which the College uses personal information of students 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 student's educational, social and medical wellbeing;
- seeking donations;
- conducting marketing and promotional activities;
- to satisfy the College's legal obligations and allow the College to discharge its duty of care; and
- recovering any outstanding fees owed to the College.

The College requires personal information to look after student wellbeing and to satisfy legal obligations. Where a request for personal information is not complied with, the College may not be able to enrol or continue the enrolment of the student.

#### Job applicants, staff members and contractors

Personal information of job applicants, staff members and contractors may be collected for the College's primary purpose of assessment of suitability for employment.

Further purposes for which the College uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract;
- for insurance purposes;
- in seeking funds and marketing for the College; and
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

#### Volunteers

The College collects, uses, holds and discloses personal information about volunteers who assist the College in its functions or who conduct associated activities, such as serving in alumni associations that enable the College and volunteers to effectively work together. The College may also collect information in relation to child protection legislation and working with children checks in order to satisfy legal obligations.

#### Marketing and fundraising

The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring the College continues to be a quality learning environment in which both students and staff thrive. Non-sensitive information held by the College may be disclosed to an organisation that assists in fundraising, for example, the Matthew Flinders Foundation Limited or the Old Flinderian's Association (Alumni organisation). There is an opportunity to opt out of direct marketing.

Parents, staff, contractors and other members of the wider College community may from time-to-time receive fundraising information. College publications including, but not limited to, newsletters, magazines, the Prospectus and the College websites and social media sites, which include aggregated personal information, may be used for marketing purposes.

#### **4. Who might the College disclose personal information to?**

There are a range of people and organisations to whom the College may disclose personal information. The particular party the College discloses personal information to will depend on the dealings the individual has with us.

The 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 sports coaches;
- recipients of College publications, like newsletters and magazines;
- Parents;
- anyone you authorise the College to disclose information to;
- third parties such as debt collection agencies for the purposes of recovering any outstanding fees owed to the College;
- Blue Card Services;
- service providers who provide us with business, technology, marketing, operational, professional and other services; and
- Anglican Schools Commission; and
- anyone to whom we are required to disclose the information to by law.

#### 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 to facilitate a school exchange. The College will take all steps reasonable in the circumstances to ensure that the overseas recipient complies with the APPs.

The College will not send personal information about an individual outside Australian without:

- obtaining the consent of the individual (or in some cases this consent will be implied);
- complying with the *Australian Privacy Principles*.

## **5. How do we store and hold personal information?**

The College's staff are required to respect the confidentiality of students and parents' personal information and the privacy of individuals. The College mostly holds personal information electronically in its IT systems, secure servers and databases, but we also hold personal information in paper records. The College has in place steps to protect the personal information that the College 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.

Regular audits are conducted by the College to ensure that access to systems and personal and private information is limited to authorised persons.

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

An individual has the right to obtain access to any personal information which the College holds about them, and to advise the College 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. The College endeavours to ensure that the personal information it holds is accurate, complete and up to date.

An employee may seek to update their personal information held by the College by contacting the Human Resources Office. The College may require an individual to verify their identity and specify what information they require. The College cannot give you information about anyone else. The College may charge a fee to cover the cost of verifying applications and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance.

We will allow access or make the changes requested unless we consider the Privacy Act or another relevant law requires us to withhold the information, or not make the changes. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal. If we refuse you access or to correct your personal information, you can make a complaint about this, by following the complaint procedures in this *Privacy Policy* (see details below).

## **7. Anonymity and consequences of not providing personal information**

If it is lawful and practicable to do so, the College may offer the opportunity of dealing with us anonymously or by using a pseudonym. For example, when making a general inquiry about the College.

However, it is not possible for the College to enrol or continue the enrolment of a student or provide education for the student if the student or her parents/guardians wish to interact anonymously or using a pseudonym.

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

The College respects every parent's right to make decisions concerning their child's education. Generally, the College will refer any request for consent and notices in relation to the personal information of a student to the student's parents. The College will treat consent given by parents as consent given on behalf of the student and notice to parents will act as notice to the student.

Parents may seek access to personal information held by the 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 their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

## **9. 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 APPs, please contact the Principal. The College will investigate any complaint and will notify the complainant of the making of a decision as soon as is practicable after it has been made.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner for guidance on alternative courses of action which may be available.

## **10. Using other websites**

The College's website may contain links or references to other websites to which this Privacy Policy may not apply. You should review the Privacy Policy of each of those websites and assess whether those policies are acceptable to you before using those websites.

## **11. Changes to this Policy**

The College may, from time-to-time, review and update this *Privacy Policy* to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing College environment.

Approved by: Board of Directors Date Approved: November 2025	Reference Code: ADM-060-POL-005 Next Review Due: November 2026
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This policy may be updated or revised from time-to-time. The College will not notify you each time the policy is changed. If you are unsure whether you are reading the most current version, you should contact the Principal's Office.