



PRIVACY POLICY

1 INTRODUCTION

This Privacy Policy sets out how Minaret College manages personal information provided to or collected by us. Minaret College is bound by the Australian Privacy Principles contained in the Commonwealth *Privacy Act 1988*. In relation to health records, the College is also bound by the Health Privacy Principles which are contained in the *Health Records Act 2001* (Vic).

Minaret College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing school environment.

2 WHAT KINDS OF PERSONAL INFORMATION DOES MINARET COLLEGE COLLECT AND HOW DOES THE COLLEGE COLLECT IT?

The type of information the College collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- a) students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the College, including:
 - a. name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
 - b. parents' education, occupation and language background;
 - c. medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
 - d. conduct and complaint records, or other behaviour notes, and school reports;
 - e. information about referrals to government welfare agencies;
 - f. counselling reports;
 - g. health fund details and Medicare number;
 - h. any court orders;
 - i. volunteering information; and
 - j. photos and videos at school events;

- b) job applicants, staff members, volunteers and contractors, including:
 - a. name, contact details (including next of kin), date of birth, and religion;
 - b. information on job application;
 - c. professional development history;
 - d. salary and payment information, including superannuation details;
 - e. medical information (e.g. details of disability and/or allergies, and medical certificates); - complaint records and investigation reports;
 - f. leave details;
 - g. photos and videos at school events;
 - h. workplace CCTV surveillance information;
 - i. work emails and Internet browsing history; and
- c) other people who come into contact with the College, including name and contact details and any other information necessary for the particular contact with the College.

3 PERSONAL INFORMATION YOU PROVIDE

Minaret College 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.

4 PERSONAL INFORMATION PROVIDED BY OTHER PEOPLE

In some circumstances Minaret 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 school.

5 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 College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the school and employee. Minaret College handles staff health records in accordance with the Health Privacy Principles in the Health Records Act.

6 HOW WILL THE COLLEGE USE THE PERSONAL INFORMATION YOU PROVIDE?

The College 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.

6.1 STUDENTS AND PARENTS

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

The purposes for which the College uses personal information of students and Parents include:

- a) keeping Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- b) day-to-day administration of the school;
- c) looking after students' educational, social and medical wellbeing;
- d) seeking donations and marketing for the school; and
- e) to satisfy the school's legal obligations and allow the College discharge its duty of care.

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

6.2 JOB APPLICANTS AND CONTRACTORS

In relation to personal information of job applicants and contractors, the 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 Minaret College uses personal information of job applicants and contractors include:

- a) administering the individual's employment or contract, as the case may be;
- b) for insurance purposes;
- c) seeking donations and marketing for the College; and
- d) satisfying the school's legal obligations, for example, in relation to child protection legislation.

6.3 VOLUNTEERS

Minaret College also obtains personal information about volunteers who assist the school in its functions or conduct associated activities, such as alumni associations, to enable the school and the volunteers work together.

6.4 MARKETING AND FUNDRAISING

Minaret College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that we continue to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the school's fundraising, for example, the alumni organisation or, on rare occasions, external fundraising organisations.

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

7 WHO MIGHT MINARET DISCLOSE PERSONAL INFORMATION TO AND STORE YOUR INFORMATION WITH?

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

- a) other schools and teachers at those schools;
- b) government departments (including for policy and funding purposes);
- c) medical practitioners;
- d) people providing educational, support and health services to the School, including specialist visiting teachers, sports coaches, volunteers and counsellors;
- e) providers of learning and assessment tools;
- f) assessment and educational authorities, including the Australian Curriculum,
- g) Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- h) people providing administrative and financial services to Minaret College;
- i) recipients of school publications, such as newsletters and magazines;
- j) students' parents or guardians;
- k) anyone you authorise the College to disclose information to; and
- l) anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

8 SENDING AND STORING INFORMATION OVERSEAS

Minaret College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange.

However, the College will not send personal information about an individual outside Australia without:

- a) obtaining the consent of the individual (in some cases this consent will be implied); or
- b) otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Minaret College 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 service provider's servers which may be situated outside Australia. An example of such a cloud service provider is Office365.

9 HOW DOES MINARET TREAT SENSITIVE INFORMATION?

In referring to 'sensitive information', Minaret College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs and practices 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.

10 MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

Minaret College staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information we hold 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.

11 ACCESS AND CORRECTION OF PERSONAL INFORMATION

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to seek and 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 to update any personal information Minaret College holds about you or your child, please contact the Administration Manager by phone or in writing. The College may require you to verify your identity and specify what information you require.

The College 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 College 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.

12 CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

Minaret College respects every Parent's right to make decisions concerning their child's education. Generally, the College will refer any requests 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 given to the student. Parents may seek access to personal information held by the school about them or their child by contacting the Administration Manager by telephone or in writing. However, there may 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.

Minaret 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 warrant it.

13 ENQUIRIES AND COMPLAINTS

If you would like further information about the way Minaret College manages the personal information it holds, or wish to complain that you believe that the College has breached the Australian Privacy Principles please contact the Executive Principal in writing or calling on 9574-0567.

The College 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.

DOCUMENT CONTROL

Doc ID: POL-MC-01
Version 1.1
Reviewed: March 2022
Approved: March 2022

STANDARD COLLECTION NOTICE PARENTS AND STUDENTS

- 1) Minaret College collects personal information, including sensitive information about students and parents/guardians before and during the course of a student's enrolment at the school. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to provide schooling to students enrolled at school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of Minaret College.
- 2) Some of the information we collect is to satisfy Minaret's legal obligations, particularly to enable the College 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 laws.
- 4) Health information about students is sensitive information within the terms of the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988*. We may ask you to provide medical reports about students from time to time.
- 5) Minaret College may disclose personal and sensitive information for educational, administrative and support purposes. This may include to:
 - a) other schools and teachers at those schools;
 - b) government departments (including for policy and funding purposes);
 - c) medical practitioners;
 - d) people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
 - e) providers of learning and assessment tools;
 - f) 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);
 - g) people providing administrative and financial services to the College;
 - h) anyone you authorise the College to disclose information to; and
 - i) anyone to whom Minaret College is required or authorised to disclose the information by law, including child protection laws.

- 6) Personal information collected from students is regularly disclosed to their parents or guardians.
- 7) Minaret College 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 Minaret College Privacy and Internet Use Policies.
- 8) Minaret Privacy Policy, accessible on the school's website, 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, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
- 9) Minaret 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.
- 10) Minaret College may engage in fundraising activities. Information received from you may be used to make an appeal to you. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
- 11) On occasions information such as academic and sporting achievements, student activities and similar news is published in school newsletters and magazines, on our website, Facebook or Skoolbag App. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. Minaret College 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 in our promotional material or otherwise make this material available to the public.
- 12) If you provide Minaret College 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 us and why.

Note: This Standard Collection Notice should be read together with Minaret College Privacy Policy.

EMPLOYMENT APPLICATION COLLECTION NOTICE

- 1) In applying for this position you will be providing Minaret College with personal information. We can be contacted by phone (03-9574-0567), email (hr@minaret.vic.edu.au) or in writing (PO BOX 264, Springvale 3171 VIC).
- 2) If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
- 3) Minaret College Privacy Policy, accessible on the school's website www.minaret.vic.edu.au, 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 College 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. Any refusal will be notified in writing with reasons if appropriate.
- 4) We will not disclose this information to a third party without your consent unless otherwise permitted.
- 5) Under Child Protection laws we are required to collect information such as working with children and/or criminal record checks.
- 6) Minaret College 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 online or 'cloud' service providers is contained in Minaret College 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 College and why.

CONTRACTOR/VOLUNTEER COLLECTION NOTICE

- 1) In offering, applying or agreeing to provide services to Minaret College, you will be providing us with personal information. We can be contacted by phone (03-9574-0567), email (hr@minaret.vic.edu.au) or in writing (36-38 Lewis Street, Springvale 3171 VIC).
- 2) If you provide us with personal information, for example your name and address or information contained on your resume, we will 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 future references.
- 4) Minaret College 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. Any refusal will be notified in writing with reasons if appropriate.
- 5) We will not disclose this information to a third party without your consent unless otherwise permitted to.
- 6) Under Child Protection laws we are required to collect information such as working with children and/or criminal record checks.
- 7) Minaret College 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 Minaret's use of on online or 'cloud' service providers is contained in the school's Privacy Policy.
- 8) 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.

COUNSELLING AT MINARET COLLEGE – THINGS YOU SHOULD KNOW

- 1) Minaret College provides counselling services for its students as part of its pastoral care program. These are provided through counsellors employed by the College.
- 2) Students are encouraged to make use of these services if they need assistance. However, there is a number of things that students and their parents should know before using the counselling service.
- 3) Records will be made of counselling sessions and because the counsellor is an employee, those records belong to the school, not the counsellor.
- 4) Minaret College is very conscious of the need for confidentiality between counsellors and students. However, at times it may be necessary for the Counsellor to divulge the contents of discussions or records to the Head of School or Head of Campus if the Counsellor considers it necessary for the student's welfare to discharge the school's duty of care to the student.
- 5) It is also possible that the Principal may need to disclose aspects of discussions with counsellors to others in order to assist the student.
- 6) Where a disclosure is made it would be limited to those who need to know, unless the student consents to some wider disclosure.
- 7) We emphasise that disclosures (if any) would be very limited. However if a student is not prepared to use the counselling services on the basis set out above the student will need to obtain counselling services from outside the school.