



CORNERSTONE

COLLEGE

Christ our Firm Foundation

PRIVACY POLICY

We love. We learn. We grow.

This policy is current as at Monday, 26 March 2018

Your privacy is very important to us

This policy advises how the College uses and manages your personal information as required by the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* and *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

The College may review and update this Privacy Policy as the need arises due to technological advancements, or changes in College operations or Australian laws.

This policy describes:

- The types of information we collect and store;
- how and why we collect and store the information;
- how you can access your personal information and request changes;
- how you can express concern or inquire about our collection, handling, use and disclosure and how we will do that; and
- whether we will disclose your personal information to any overseas recipients.

The types of information we collect

We collect a range of personal information, including (but not limited to), health and sensitive information about:

- Students, siblings, parents and/or caregivers before, during and after the course of a student's enrolment at the College;
- job applicants, staff members, contractors, volunteers and international agents who assist us with the provision of learning and other activities;
- individuals who are involved with activities associated with the College (such as Old Scholars, past staff, future and past parents, sponsors); and
- other people who come into contact with the College.

How we collect your personal information

Generally, we collect personal information on forms associated with enrolments, by receiving emails and telephone calls, in face-to-face meetings and interviews, through financial transactions, and through surveillance activities such as email monitoring and the use of CCTV security cameras on College grounds.

We may also collect personal information from other people (for example a report from a medical professional) or an independent source (such as a telephone directory or online), however we will only do this when it is not practical to collect the information from you directly.

How does Cornerstone College use the personal information you provide?

We only use your personal information primarily for the purpose it was collected, or for a related secondary purpose that can be reasonably expected, or to which you have consented, such as:

- Providing educational services to our students;
- pastoral care, extra-curricular and health services to students;
- satisfying our legal obligations including our duty of care and child protection obligations;
- keeping parents informed as to school community matters through correspondence and publications;
- assessment and educational authorities, including the Australian Curriculum Assessment and Reporting Authority (ACARA)

and National Assessment Program – Literacy and Numeracy (NAPLAN) Test Administration Authorities (who will disclose it to the entity that manage the online platform for NAPLAN);

- marketing, promotional and fundraising activities;
- supporting the activities of our Old Scholars and Parents', Teachers' and Friends' Association;
- supporting community based causes, activities and charities related to the College's functions or activities;
- helping us to improve our day to day operations; train our staff; develop our systems, programs and services; undertake planning, research and analysis;
- College administration including for insurance purposes;
- the employment of staff and contractors; and
- the engagement of volunteers.

We only collect sensitive information that is necessary for one or more of these functions or activities, if we have the consent of the individuals to whom the information relates, or if it is necessary to support, lessen or prevent a serious threat to life, health or safety.

We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to, and the secondary purpose is directly related to the primary purpose, or if we are required to by law.

How do we store your information and keep it secure?

We store your information in a variety of formats including on databases, in hard copy files, and on personal devices such as laptop computers, tablets, mobile phones, cameras and other recording devices.

The security of your information is very important to us and we take all reasonable steps to protect it from misuse, loss, unauthorised access, modification or disclosure. This includes:

- Restricting access on College databases on a need to know basis with staff security levels based on roles and responsibilities;
- ensuring all staff are aware that they must not reveal or share passwords;
- that hardcopy files holding sensitive health information are in lockable filing cabinets in locked rooms;
- implementing physical security measures on College grounds to prevent break-ins;
- implementing ICT security systems, policies and procedures designed to protect personal information storage on our computer networks;
- implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information; and
- undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime in their location.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Personal information of students

The *Privacy Act* does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information. At Cornerstone College we take a common-sense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students, and we will treat consents provided by parents/carers as consents provided by a student.

We are however cognisant of the fact that children do have rights under the *Privacy Act*, and that in certain circumstances (especially when dealing with older students and sensitive information), it will be appropriate to seek and obtain consents directly from students. We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others or result in a breach of the College's duty of care to the student.

Disclosure of personal information to overseas recipients

We may disclose personal information about an individual to overseas recipients such as when we are organising an overseas excursion or facilitating a student exchange. We endeavour to ensure our data remains stored only within Australia, however sometimes the circumstances of our service providers change.

We will however, take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- We have the individual's consent (which may be implied); or
- we have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- we form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- we are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

How we ensure the quality of your personal information

We take reasonable steps to ensure your personal information is accurate and complete. You may request that the College updates or corrects your personal information by contacting us using the contact details set out below. You may request access to your personal information at any time.

How we deal with complaints about the handling of your personal information

If you wish to make a complaint about a breach by the College of the Australian Privacy Principles you may do so by providing a written complaint by email, letter, facsimile, our website or by personal delivery, verbally by visiting the College or over the telephone. We undertake to respond within a reasonable timeframe and we may seek further information from you to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

- that hardcopy files holding sensitive health information are in lockable filing cabinets in locked rooms;
- implementing physical security measures on College grounds to prevent break-ins;
- implementing ICT security systems, policies and procedures designed to protect personal information storage on our computer networks;
- implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information; and
- undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime in their location.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Personal information of students

The *Privacy Act* does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information. At Cornerstone College we take a common-sense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students, and we will treat consents provided by parents/carers as consents provided by a student.

We are however cognisant of the fact that children do have rights under the *Privacy Act*, and that in certain circumstances (especially when dealing with older students and sensitive information), it will be appropriate to seek and obtain consents directly from students. We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others or result in a breach of the College's duty of care to the student.

Disclosure of personal information to overseas recipients

We may disclose personal information about an individual to overseas recipients such as when we are organising an overseas excursion or facilitating a student exchange. We endeavour to ensure our data remains stored only within Australia, however sometimes the circumstances of our service providers change.

We will however, take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- We have the individual's consent (which may be implied); or
- we have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- we form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- we are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

How we ensure the quality of your personal information

We take reasonable steps to ensure your personal information is accurate and complete. You may request that the College updates or corrects your personal information by contacting us using the contact details set out below. You may request access to your personal information at any time.

How we deal with complaints about the handling of your personal information

If you wish to make a complaint about a breach by the College of the Australian Privacy Principles you may do so by providing a written complaint by email, letter, facsimile, our website or by personal delivery, verbally by visiting the College or over the telephone. We undertake to respond within a reasonable timeframe and we may seek further information from you to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

You can contact us about this Policy or about your personal information by:

- Email to privacy@cornerstone.sa.edu.au;
- writing to our Privacy Officer at PO Box 820, MT BARKER SA 5251;
- sending a facsimile to +61 8 8398 6098;
- telephoning +61 8 8398 6000; or
- via the Contact Us page of our website at www.cornerstone.sa.edu.au

You are within your rights to contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information you require or the assistance you might otherwise receive if it is not practical to do so.

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website regularly for any changes.



68 Adelaide Road, Mount Barker, South Australia 5251

+61 8 8398 6000

cornerstone.sa.edu.au

mail@cornerstone.sa.edu.au