



# Privacy Policy



<b>Policy Aim:</b>	Moreton Bay College and Moreton Bay Boys' College and its associated entities (Colleges) are bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the Colleges and describes how the Colleges use and manage personal information provided to or collected by these entities.
<b>Scope and Responsibilities:</b>	The policy applies to board members, employers, employees, volunteers, parents/guardians, students, contractors, and people visiting either College site; and describes the type of information the Colleges collect, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.
<b>Board Approval:</b>	Required
<b>Background information:</b>	<p>The Colleges will use personal information that they collect for the primary purpose of providing educational services and experience, of the highest order, to the students of the Colleges, and for such other secondary purposes that are related to the primary purpose of collection.</p> <p>In relation to personal information of students and parents, the Colleges primary purpose of collection is to enable both Colleges to provide an appropriate education for each student. This includes satisfying both the needs of parents and the needs of the students throughout the whole period that the students are enrolled at the respective College.</p> <p>Since 1 July 2011, Moreton Bay College and Moreton Bay Boys' College have amalgamated. Although both Colleges remain separate legal entities, personal information gathered by one College may be passed on to the other College.</p> <p>Further, the Colleges may establish associated entities from time to time to support its purpose and mission. Some of these entities will operate as separate legal entities. These entities are listed in the definition section of the Policy.</p> <p>The Colleges' associated entities provide related services to the Colleges and its community and any information collected by these entities is ultimately used for the purposes of providing the educational services and experience to the Colleges' community.</p> <p>Personal information collected by the Colleges or any associated entity may be passed on to the other entities.</p>



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**Policy:**

- **Exception in relation to employee records**

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to the Colleges treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and an employee.

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# Privacy Policy

- Policy**

This Privacy Policy sets out how the Colleges manage personal information provided to, or collected by, them.

The Colleges are bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act.

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

**What kinds of personal information do the Colleges collect and how do the Colleges collect it?**

The type of information the Colleges collect and hold includes, but is not limited to, personal information, which may include health and other sensitive information about:

- students and parents and/or guardians (before, during and after the course of a student's enrolment at the respective College);
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the Colleges.

**Personal information you provide**

The Colleges will generally collect personal information about an individual, by way of forms filled out by parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasion people other than parents and students provide personal information. This information may be obtained digitally or in hard copy.

**Personal information provided by other people**

In some circumstances the Colleges 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.

**How will the Colleges use the personal information you provide?**

The Colleges will use the personal information they collect 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.



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## Students and Parents

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

The purposes for which the Colleges use personal information of students and parents include:

- keeping parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- administering the day-to-day operations of the Colleges;
- looking after students' educational, social and medical wellbeing;
- seeking donations and marketing for the Colleges;
- satisfying the Colleges legal obligations to allow the Colleges to discharge their duty of care; and
- recovering any outstanding fees owed to the Colleges.

In some cases where the College request 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.

## Job applicants, Staff Members and Contractors

In relation to personal information of job applicants, staff members and contractors, the Colleges primary purpose of collection is to assess and, if successful, to engage the applicant, staff member or contractor.

The purposes for which the Colleges use personal information of job applicants, staff members and contractors include:

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

## Volunteers

The Colleges also obtain personal information about volunteers, who assist the Colleges in their functions or conduct associated activities; such as alumni associations, to enable the Colleges and the volunteers to work together.



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## Marketing and fundraising

The Colleges treat marketing and seeking donations for the future growth and development of the Colleges as an important part of ensuring that the Colleges continue to provide a quality learning environment in which both students and staff thrive. Personal information held by the Colleges may be disclosed to organisations that assist in the Colleges statistical research and modelling for marketing purposes and for fundraising; for example, the Colleges Foundation or alumni organisations or, on occasions, external fundraising organisations. Parents, staff, contractors and other members of the wider College communities may, from time to time, receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

## Associated entities

The Colleges recognise that an outstanding student experience and education at MBC and MBBC involves a broad range of activities and services. To assist in the delivery of this outstanding experience, the Colleges may establish separate entities from time to time. These entities may or may not be separate legal entities.

These entities are listed in the definition section of the Policy.

To assist these entities and the Colleges in achieving this common goal, information may be shared between the entities. The information shared and used by each of the entities is limited to the information and use necessary for each of the Colleges and the entities to fulfill their primary purpose.

## To whom might the Colleges disclose personal information?

The Colleges may disclose personal information, including sensitive information, held about an individual to:

- associated entities of the Colleges;
- another school;
- government departments;
- medical practitioners;
- people providing services to the Colleges, including specialist visiting teachers, lawyers, counsellors and sports coaches;
- recipients of College publications, such as newsletters and magazines;
- parents;
- third parties such as debt collection agencies, for the purposes of recovering any outstanding fees owed to the Colleges;
- anyone you authorise the Colleges to



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disclose information to; and

- anyone to whom the Colleges are required to disclose the information by law.

### **Sending information overseas**

The Colleges 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, or to facilitate a school exchange.

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

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



**Sensitive information**

In referring to sensitive information, the Colleges mean: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices, criminal record, 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.

**Management and security of personal information**

The Colleges staff are required to respect the confidentiality of students and parents' personal information and the privacy of individuals. The Colleges have in place steps to protect the personal information the Colleges 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.

**Access and correction of personal information**

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the Colleges hold about them, and to advise the Colleges 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 update any personal information the Colleges hold about you or your child, please contact the College Executive Principal in writing.

The Colleges may require you to verify your identity and specify what information you require. The Colleges 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 Colleges 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.

**Consent and rights of access to the personal information of students**

The Colleges respect every parent's right to make decisions concerning their child's education. Generally, the Colleges will



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	<p>refer any requests for consent and notices in relation to the personal information of a student to both of the student's parents. The Colleges 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.</p> <p>As mentioned above, parents may seek access to personal information held by the Colleges about them or their child by contacting the Executive 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 Colleges duty of care to the student.</p> <p>The Colleges may, at their discretion, on the request of a student, grant that student access to information held by the respective 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.</p> <p><b>Enquiries and complaints</b></p> <p>If further information is required about the way the Colleges manage the personal information it holds, or in the case of a complaint that the Colleges have breached the Australian Privacy Principles, the Executive Principal should be contacted. The Colleges will investigate any complaint and will notify the complainant of the making of a decision in relation to the complaint as soon as is practicable.</p>
<p><b>Definitions:</b></p>	<p><b>Associated Entities</b></p> <p>Associated entities are entities that are established by MBC or MBBC to support the Colleges in their vision and mission. These entities may vary from time to time but include –</p> <ul style="list-style-type: none"> <li>• Moreton Bay Colleges' Early Learning Centre</li> <li>• Moreton Bay Colleges Foundation</li> <li>• Moreton Bay Swimming (The Moreton Bay Colleges' Swimming Association Inc)</li> <li>• MBC Parents and Friends Association</li> <li>• MBBC Parents and Friends Association</li> <li>• Moreton Bay Boys' College Old Boys Committee</li> <li>• Moreton Bay Colleges Old Girls' Association</li> </ul>
<p><b>Related Documentation:</b></p>	<ul style="list-style-type: none"> <li>• Privacy Amendment (Enhancing Privacy Protection) Act 2012</li> <li>• Child Protection Policy</li> </ul>
<p><b>Legislation Applicable:</b></p>	<p>Privacy Act 1988 (Commonwealth) as amended</p>

**OFFICE USE ONLY**

<p><b>Version:</b></p>	<p>2020</p>
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<b>Revision Date:</b>	<b>October 2020</b> <i>(or as appropriate to take account of new laws and technology, changes to the Colleges' operations and practices and to make sure it remains appropriate to the changing environment)</i>
<b>Document Owner:</b>	<b>MBC Board of Governors / MBBC Board of Directors</b>



## APPENDIX 1

### Standard Collection Notice

**The Colleges collect personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the Colleges to provide education to the students and to enable them to take part in all the activities of the Colleges.**

**Some of the information we collect is to satisfy the Colleges' legal obligations, particularly to enable the Colleges to discharge its duty of care.**

**Laws governing or relating to the operation of the Colleges require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.**

**Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may ask you to provide medical reports about your enrolled children from time to time.**

**The Colleges from time to time discloses personal and sensitive information to others for administrative and educational purposes, in order to facilitate the transfer of a student. This includes to other Colleges, government departments, medical practitioners and people, providing services to the Colleges, including specialist visiting teachers, sports coaches, volunteers and counsellors.**

**The College may also disclose your personal information to third parties, such as debt collection agencies and lawyers, for the purposes of recovering any outstanding fees you owe to the Colleges.**

**Personal information collected from students is regularly disclosed to their parents or guardians.**

**The Colleges may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.**

**The Colleges' Privacy Policy sets out how parents or students may seek access to personal information collected about them. 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 College's duty of care to the student; or where students have provided information in confidence.**

**The Colleges' Privacy Policy also sets out how you may complain about a breach of privacy and how the Colleges will deal with such a complaint.**

**As you may know the Colleges from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the Colleges' fundraising activities solely for that purpose. We will not disclose your**



***personal information to third parties for their own marketing purposes without your consent.***

***On occasions information such as academic and sporting achievements, student activities and similar news is published in Colleges' newsletters and magazines and on our website. Photographs of student activities such as sporting events, College camps and College excursions may be taken for publication in College newsletters and magazines on our website and used in various marketing materials. The College will obtain separate permission from the students' parent or guardian prior to publication.***

***We may include students and students' parents' contact details in a class list and Colleges' directory.***

***If you provide the Colleges 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 the College and why; that they can access that information if they wish; and that the Colleges do not usually disclose this information to third parties.***



## APPENDIX 2

### **Alumni Association Collection Notice**

***The Alumni Associations may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of the Colleges, and to keep alumni members informed about other members.***

***We must have the above information to enable us to continue your membership of the Alumni Association.***

***As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used to assist in its fundraising activities. If you do not agree to this, please advise us now.***

***The Alumni Association may publish details about you in our College publications and on the Colleges' website. If you do not agree to this, you must advise us now.***

***The Colleges' Privacy Policy contains details of how you may seek access to personal information collected about you, and how you may complain about a breach of the Australian Privacy Principles.***

***The College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.\****

***If you provide personal information to us about other people, we encourage you to inform them of the above matters.***

***\* If applicable***

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## APPENDIX 3

### **Employment Collection Notice**

***In applying for this position you will be providing the College with personal information. We can be contacted at the College during business hours.***

***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.***

***The Colleges' Privacy Policy contains details of how you may complain about a breach of the Australian Privacy Principles or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.***

***We will not disclose this information to a third party without your consent. We are required to conduct a criminal record check to collect information regarding whether you are, or have been, the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. \* We may also collect personal information about you in accordance with these laws.\****

***The Colleges may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.***

***If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the Colleges and why; that they can access that information if they wish; and that the Colleges do not usually disclose the information to third parties.\****

***\* If applicable***

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## APPENDIX 4

### **Contractor/Volunteer Collection Notice**

***In applying to provide services to the College, you will be providing The Colleges with personal information. We can be contacted at the College during business hours.***

***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.***

***You agree that we may store this information for three months.***

***The College's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the Australian Privacy Principles.***

***We will not disclose this information to a third party without your consent.***

***We are required to conduct a criminal record check to collect information regarding whether you are, or have been, the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law.\*We may also collect personal information about you in accordance with these laws.\****

***The Colleges may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.\****

***If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the Colleges and why; that they can access that information if they wish; and that the Colleges do not usually disclose the information to third parties.***

***\* If applicable***

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