

Privacy Policy

POLICY STATEMENT

Concordia College seeks to ensure that the privacy of relevant individuals is appropriately protected.

RATIONALE

Concordia College respects the privacy of its community members and seeks to manage personal information as required by the Australian Privacy Principles (“APPs”) contained in the Privacy Act (1988) and in accordance with relevant Australian legislation.

DEFINITIONS

1. Privacy: The right not to have personal or sensitive information unlawfully distributed.
2. Personal information: Information about an individual that is reasonably identifiable. This could include name, contact details, signature, and date of birth.
3. Sensitive information: Information relating to a person’s racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences, criminal record, and health information.

POLICY PRINCIPLES

1. This policy and privacy statements are readily available.
2. The College will collect relevant information to assist in the ordinary course of its business.
3. As far as reasonably possible, the College will ensure that all who have access to private information collected by the College have a sound understanding of confidentiality.
4. The College will show open and transparent management of personal information according to the Privacy Statement.
5. The College will respect the right of an individual requesting non-publication of personal images.
6. The College will generally collect personal information held about an individual by way of forms completed by parents or students, face-to-face meetings, interviews and telephone calls.
7. In some circumstances the College may accept personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another College.
8. The College will use personal information for the purpose for which it was collected.
9. The College’s authority over the student derives from the enrolment contract with the signatory and its duties at law.
10. In some cases where the College requires personal information, which is not provided, the College may not continue with aspects of the enrolment.
11. Where appropriate the College will disclose relevant personal information as required by law.
12. The College may store personal information in the ‘cloud’ which may mean that it resides on servers which are situated outside Australia.
13. The College has in place steps to reasonably protect the personal information which it holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password protected computerised records.
14. The College may disclose personal information about an individual to overseas recipients in certain circumstances, for instance to facilitate a school exchange.
15. The College will not store personal information longer than necessary.
16. A person may reasonably access their personal file held by the College via application to the Campus Principal or delegate.
17. A student may reasonably access their school file held by the College via application to the Campus Principal or Delegate according to the Act.
18. The College will take appropriate, prompt action if they have reasonable grounds to believe that a data breach may have, or is suspected to have occurred.
19. An individual who believes there has been a breach of privacy may lodge a complaint to the Campus Principal unless the complaint is about the Campus Principal College in which case the Head of College is notified.
20. The College will, from time to time, review and update this Privacy Policy.

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SCOPE

This policy applies to all members of the Concordia College community whose personal information is collected, stored, used or accessed, including those who reside overseas.

RESPONSIBILITIES

Head of College

- Oversee the processes to support the privacy of all members of the College community.
- Delegate the management of the collection, storage, use and access of personal information to appropriate members of staff.
- Ensure that sufficient College resources are provided to support this policy.

APPROVED AUTHORITY:	Concordia College Board
RESPONSIBLE OFFICER:	Head of College
IMPLEMENTATION DATE:	2020
LAST POLICY REVIEW DATE:	October 2024
NEXT REVIEW DATE:	*October 2027

*Unless otherwise indicated, this policy will still apply beyond the review date. This policy will also be updated as required due to any changes in legislation etc.

IMPLEMENTATION

This policy is implemented by

- Staff training and awareness
- Communication to College Community

NOTE: This policy should be read in conjunction with the Privacy Statement on the Concordia College website.

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APPENDIX

Concordia College is committed to transparency and will provide relevant information from official files as deemed reasonable and appropriate.

This appendix outlines the procedures for responding to requests for documents or records held by the College

1. Legal Compliance
The College is not bound by Freedom of Information requests to the same extent that applies to government agencies but will comply with all legal requirements.
2. Student Records
A copy of a student's last report or summary of the report will be supplied at no cost to the applicant.
3. Employee Records
A Statement of Service requested by a former employee will be supplied at no cost to the applicant.
4. Personal Information Protection
Personal information about individuals other than the applicant will not be disclosed.
5. Request Denial
Requests for information deemed inappropriate by the Head of College or delegate or that are not legally enforceable will be denied.
6. Fee Structure
If a request exceeds the information outlined in points 2 & 3 and is approved the associated costs will be charged to the applicant.

Schedule of Fees

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| a. | On application for access to documents | \$40.00 |
| b. | If the process of accessing and copying the documents takes longer than one hour, each subsequent 15 minutes will be charged | \$15.00 |
| c. | Photocopying per page | \$0.20 |
| d. | Postage of documents | At Cost |
| e. | Transcripts longer than 1 page will be charged at | \$10.00 per page |