

# PRIVACY POLICY

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## AL SIRAAT COLLEGE INC

Association No. A0051356N  
ABN 96 957 841 991

A registered independent school under the Education Training and Reform Act 2006 (Vic)

A registered charity with the Australian Charities and Not-for-profits Commission

Version 2.0 –11 April 2022



AL SIRAAT  
COLLEGE

## 1 PURPOSE

Al Siraat College values the privacy of every person and is committed to protecting information that the College collects.

All staff including contractors, service providers and volunteers of the College, must comply with Victorian privacy law and this policy.

In Al Siraat College the management of 'personal information' and 'health information' is governed by the Privacy and Data Protection Act 2014 (Vic) and Health Records Act 2001 (Vic) (collectively, Victorian privacy law).

This policy explains how our college collects and manages personal and health information, consistent with Victorian privacy law.

## 2 DEFINITIONS

**Personal information** is information or opinion, whether true or not, about a person whose identity is apparent, or can reasonably be ascertained, from the information or opinion – that is recorded in any form. For example, a person's name, address, phone number and date of birth (age). De-identified information about students can also be personal information.

**Health information** is information or opinion about a person's physical, mental or psychological health or disability, that is also personal information – whether in writing or not. This includes information or opinion about a person's health status and medical history, immunisation status and allergies, as well as counselling records.

**Sensitive information** is information or opinion about a set of specific characteristics, including a person's racial or ethnic origin, political opinions or affiliations, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices; or criminal record. It also includes health information.

## 3 WHAT INFORMATION IS COLLECTED

Our college collects the following type of information:

- information about students and their families, provided by students, their families and others.
- information about job applicants, staff, volunteers and visitors; provided by job applicants, staff members, volunteers, visitors and others.

## 4 HOW THIS INFORMATION IS COLLECTED

Our college collects information in a number of ways, including:

- in person and over the phone: from students and their families, staff, volunteers, visitors, job applicants and others
- from electronic and paper documentation: including job applications, emails, invoices, online enrolment forms, letters to our college, consent forms (for example: enrolment, excursion consent forms), surveys or college-controlled social media
- through online tools: such as apps and other software used by our college
- through any CCTV cameras located at our college.

## **Collection notices**

When our college collects information about you, our college takes reasonable steps to advise you of how the information will be handled. This includes the purpose of the collection, and how to access, update and correct information held about you.

## **Unsolicited information about you**

Our college may receive information about you that we have taken no active steps to collect. If permitted or required by law, our college may keep records of this information. If not, we will destroy or de-identify the information when practicable, lawful and reasonable to do so.

## **5 WHY THIS INFORMATION IS COLLECTED**

### **Primary purposes of collecting information about students and their families**

Our college collects information about students and their families when necessary to:

- educate students
- support students' social and emotional wellbeing, and health
- fulfil legal requirements, including to:
  - take reasonable steps to reduce the risk of reasonably foreseeable harm to students, staff and visitors (duty of care)
  - make reasonable adjustments for students with disabilities (anti-discrimination law)
  - provide a safe and secure workplace (occupational health and safety law)
- enable our college to:
  - communicate with parents about students' schooling matters and celebrate the efforts and achievements of students
  - maintain the good order and management of our college
  - ensure the effective management, resourcing and administration of our college
  - visit College families to build relationships and to connect families with our prayer facilities
  - fulfil statutory functions and duties
  - plan, fund, monitor, regulate and evaluate the College's policies, services and functions
  - comply with reporting requirements
  - investigate incidents in Al Siraat College and/or respond to any legal claims against the College.

### **Primary purposes of collecting information about others**

- Our college collects information about staff, volunteers and job applicants:
- to assess applicants' suitability for employment or volunteering
- to administer employment or volunteer placement

- for insurance purposes, including public liability and WorkCover
- to fulfil various legal obligations, including employment and contractual obligations, occupational health and safety law and to investigate incidents
- to respond to legal claims against our college/the Department.

## **6 WHEN INFORMATION IS USED OR DISCLOSED**

Our college uses or discloses information consistent with Victorian privacy law, as follows:

- For a primary purpose – as defined above
- For a related secondary purpose that is reasonably to be expected – for example, to enable the college council to fulfil its objectives, functions and powers
- With notice and/or consent – including consent provided on enrolment and other forms (the information collected will not be disclosed beyond the Department of Education and Training without consent, unless such disclosure is lawful)
- When necessary to lessen or prevent a serious threat to:
  - a person’s life, health, safety or welfare
  - the public’s health, safety or welfare
- When required or authorised by law – including as a result of our duty of care, anti-discrimination law, occupational health and safety law, child wellbeing and safety law, reporting obligations to agencies such as the Department of Health and Department of Families, Fairness and Housing and complying with tribunal or court orders, subpoenas or search warrants
- To investigate or report unlawful activity, or when reasonably necessary for a specified law enforcement purpose, including the prevention or investigation of a criminal offence or seriously improper conduct, by or on behalf of a law enforcement agency
- For college statistics purposes
- To establish or respond to a legal claim.

A unique identifier (code) is assigned to each student to enable the college to carry out its functions effectively.

## **7 RESPONDING TO COMPLAINTS**

On occasion our college receives complaints from parents and others. Our college will use and disclose information as considered appropriate to respond to these complaints (including responding to complaints made to external organisations or agencies).

## **8 DATA BREACH**

Unauthorised sharing of personal information will be considered as a data breach. Examples of data breaches include:

- Loss or theft of physical devices (such as laptops and storage devices) or paper records that contain personal information
- Unauthorised access to personal information by an employee
- Inadvertent disclosure of personal information due to ‘human error’, for example an email sent to the wrong person
- Disclosure of an individual’s personal information to a scammer, as a result of inadequate identity verification procedures.

Data breaches will be responded to in accordance with the Privacy Act 1988 (Cth) (Privacy Act). The response to a data breach will generally include the following four-step process-contain, assess, notify and review.

## 9 DOCUMENT HISTORY

Date	Author	Version	Change Reference
March-2014	Andrew Houghton	1.0	No previous document
11-Apr-2021	Dept Education & Training/Leah Hamel	2.0	Review/updated

## 10 APPROVAL AND ADOPTION OF THIS PRIVACY POLICY

Adopted by the Principal on 11<sup>th</sup> April 2022