PRIVACY POLICY

Availability of CCBC APP Privacy Policy

CCBC aims to comply with all thirteen Australian Privacy Principles contained in the legislation regarding the management of personal information collected and used by the College. The College collects, uses and stores personal, including sensitive information about students, staff, and families for the primary purpose of the College fulfilling its educational services to students. This information may be used before, during and after the course of enrolment at the College.

Full and frank disclosure of information requested is necessary for the provision of services to students, and to establish a binding contractual relationship between students, parents/guardians, and the school.

Responsibility

The Principal shall ensure training is included in the induction process, and additional training provided to staff as required, such as when legislation changes. All staff handling personal and sensitive information are responsible for ensuring compliance with this policy.

Means of Collection of Personal Information

Information is collected through the use of forms, face-to-face interviews, interviews, by phone or via email. We hold personal information electronically and in hard copy form, at our own premises.

(The College will respect the right of an individual who chooses to remain anonymous or to use a pseudonym).

Use and disclosure of Personal Information

Personal and sensitive information will only be collected from students and parents if required, and is used for the primary purpose for which it was collected. This includes: providing training services, marketing, and determining the suitability of applicants for particular school activities. Additional personal or sensitive information that may be useful but not necessary, will be marked as 'optional', and the reasons for the request made clear.

Some of the information the College collects is to enable the College to discharge its duty of care and legislative obligations. Health Information about students is sensitive information within the terms of the
Privacy Act, and is collected with the sole purpose of enacting duty of care responsibilities while the student attends the College.

The College may record personal information on external database, such as PRISMS, if required to do so by a regulating authority.

CCBC does not disclose sensitive personal information to other Third Parties without permission or instruction from the student unless required by Law to do so. If a student wishes to authorise a Third party to access records they must contact the Principal to arrange completion of an application for the release of any personal information.

**Dealing with unsolicited personal information**

If the College receives unsolicited personal information, and it is determined that the College could not have collected the information, as soon as is practicable the College will ensure that, where it has been recorded, the information is either destroyed or de-identified.

**Notification of the Collection of Personal Information**

The College will notify the individual, or make the individual aware at or before the time of collection, or as soon as is practicable after the collection of personal information, the purpose and kind of information collected. This may include, but is not limited to: name, address, phone contact, emergency contact, Medical conditions, literacy and numeracy status, educational level, occupation, fee payment method, and feedback.

CCBC may need to source or verify information about students from a third party, such as a previous school. Wherever possible this will be done with the authorisation of the parent or guardian.

**Direct Marketing**

The College may provide marketing communications and targeted advertising to students on an ongoing basis by telephone, electronic messages (for example, email), through our digital services, and by other means. These communications may relate to the services which may be of interest to students, particularly new courses available to them. A student may choose not to receive marketing material in writing to the College, via email or otherwise.

**Cross-border disclosure of Personal Information**

The College may send personal information about a student overseas at the parent’s request when the parents are living overseas.

**Integrity of Personal Information**

**Quality of personal information** - The College will take all reasonable steps to ensure the personal information collected and used is accurate, up to date, and complete. Parents and guardians are asked to assist in meeting this goal. CCBC will also ensure all personal information disclosed is relevant.

The College will take all reasonable steps to correct information that is held if it is found to be inaccurate, out of date, incomplete, irrelevant or misleading. A student may request the College to correct information, and if the College is satisfied that the request is reasonable, the College will respond within 7 days.

**Security of personal information** – CCBC will take reasonable steps to secure and protect all information held from misuse, interference, loss, or any unauthorised access, modification or disclosure. The College continually improves the security of personal information through methods which include
- securing all files with personal information in locked cabinets,
- only providing authorised staff with access to personal information,
- ensuring computer security at all times by the use of firewalls and up-to-date virus software,
- requiring individual password access to the computer system and audits of the computer system.

**Access to, and correction of personal information**

Parents/guardians may seek access to personal information collected about them and their student by contacting the College. Adult students may also seek to access personal information about themselves. However, there will be occasions when access may be denied. Such occasions would include where access would have an unreasonable impact on the privacy, health and safety of others, where access may result in a breach of the College's duty of care to the student, or where access is denied by law.

To access information, the individual must contact the Principal to complete a request for access form. The Principal must verify the individual’s identity through either presentation of appropriate identification or answering a series of targeted questions. The request for access form must be signed by both the individual and Principal as an official record of the access and identity verification. A waiting period of up to 7 days may be applied before access is granted.

Students may nominate third parties they wish to access their records. This process is conducted by the CEO. A third party access form must be completed in writing and authorised prior to the release of any information.

**Complaints about a breach of the Australian Privacy Principles**

Students, parents/guardians and staff have a right to make a written complaint to the Principal if they consider these Privacy Principles have been breached. (For the complete Complaints and Appeals policy, see CCBC website or Student handbook.) All complaints will be responded to within a reasonable period of time and resolution will be in accordance with the Privacy Principles.

**Disposal of Personal Information**

Personal and sensitive information held by the college will be destroyed or de-identified when it is no longer required. Furthermore, care will be taken to ensure the removal of all personal information from equipment as it is decommissioned.

Shredding equipment is maintained in the office for the disposal of some hard copy personal information. Where larger quantities of information are required to be destroyed the College may employ specialised contracting services.

**Review**

The College undertakes to hold a formal review at least annually to ensure this policy remains current and enforced. This review will include an audit of storage facilities and access authorities, and staff training requirements.