



## *Presbyterian Ladies' College*

MELBOURNE

### **PLC PRIVACY POLICY**

#### **Rationale**

The purpose of this policy is to ensure that, in the course of providing educational services, Presbyterian Ladies College (PLC or College) manages and protects personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs).

This policy outlines how PLC collects, uses, discloses, protects and stores personal information, and how the College manages requests to access and/or change that information.

#### **Scope**

1. This policy applies to all staff, volunteers, students and their parents/ guardians, PLC community members and contractors of PLC and its related bodies.
2. PLC can collect, hold, use and disclose information about an individual before, during and after their dealings with the College.

#### **Collection of personal information**

3. Personal information is information or an opinion about an individual from which they can be reasonably identified. PLC collects personal information from students, parents, employees, contractors, volunteers, stakeholders, job applicants and other College community members.
4. In the course of providing educational services PLC may collect and hold about students and parents (including applicants):
  - (a) Personal information including names, addresses and other contact details, dates of birth, photographs and financial information;
  - (b) Sensitive information including government identifiers (such as passport numbers), academic results, nationality, country of birth, professional memberships, family court orders and criminal records;
  - (c) Health information including medical records, disabilities, immunisation details and psychological reports.
5. As part of PLC's recruitment processes for employees, contractors and volunteers, the College may collect and hold:
  - (a) Personal information including names, addresses and other contact details, dates of birth, financial information, citizenship, employment history and references, regulatory accreditation and directorships;
  - (b) Sensitive information including government identifiers (such as drivers licence information), nationality, country of birth, professional memberships and criminal records;
  - (c) Health information including medical records, disabilities, immunisation details and psychological reports.
6. Generally, PLC will seek consent from the individual in writing before the College collects their sensitive information (including health information). The College will treat consent given by Parents or Guardians as consent given on behalf of the student, and notice to Parents or Guardians will serve as notice given to the student.



7. PLC understands an individual's right to keep his or her personal information private, and is committed to protecting and maintaining the privacy, accuracy and security of personal information.

### **Purposes for which PLC collects, holds, uses and discloses personal information**

8. PLC generally only uses or discloses personal information for one or more of the College's functions or activities, which include:
- (a) assessing a student's application for enrolment;
  - (b) providing education, pastoral care, extra-curricular and health services;
  - (c) satisfying our legal obligations including our duty of care and child protection obligations;
  - (d) keeping parents informed as to College community matters through correspondence, newsletters and magazines;
  - (e) marketing, promotional and fundraising activities;
  - (f) supporting the activities of College associations such as the Old Collegians Association, Senior School Parents' Association, Friends of Junior School, Friends of Music, Hethersett Group, Lampas;
  - (g) supporting the activities of the PLC Foundation;
  - (h) supporting community-based causes and activities, charities and other causes in connection with the College's functions, services or activities;
  - (i) assisting with the general educational and administrative purposes of the school; and
  - (j) assessing, and if appropriate, the employment of staff and engagement of contractors and volunteers.
9. There are other reasons why PLC might use or disclose an individual's information for a different purpose than those listed in this Privacy Policy. These include when the College has the individual's consent to this use or disclosure, or PLC is required or authorised by law to use or disclose the information, for example, sometimes PLC must report to child safety regulators or share information with other organisations under Information Sharing Schemes.
10. PLC may share personal information to related bodies corporate, but only if necessary for the College to provide its services. For example, when students graduate, PLC discloses contact details to the PLC Old Collegians Association.
11. The College only discloses information about an individual to overseas recipients when it is necessary; for example, to facilitate a student exchange program, store information with a cloud service provider, to keep parents or guardians of students whose permanent or temporary address is overseas informed of College matters.

### **Collection methods**

12. The collection of personal information depends on the circumstances in which PLC is collecting it. If it is reasonable and practical to do so, the College will collect personal information directly from the individual.
13. Information may be collected in writing (online, via post, email or SMS), through conversation, or collected from third parties on an individual's behalf (e.g. employment referees). Use of Information Communication Technologies (e.g., browsing websites, use of the Learning Management System) at the College or accessed from outside the College creates a digital trail, from which data can be aggregated by the College.
14. Where possible, the College has attempted to standardise how it collects personal information by using specifically designed forms (e.g. Student Application Forms). However, given the nature of the Colleges' ongoing relationships with students, parents, staff etc, PLC often also receives personal information by email, letters, notes, via our website, over the telephone, in face-to-face meetings, at functions and through financial transactions.

### *Indirect collection*



15. PLC may collect personal information from other people or independent sources (e.g. a medical professional working with a student, a third-party administrator, referees for prospective employees). The College will only collect personal information indirectly where it is not reasonable and practical to collect the personal information from the individual directly.
16. The College may collect information based on how individuals use the PLC website. PLC uses "cookies" and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve the PLC website, marketing campaigns and to record statistics on web traffic. The College does not use this information to personally identify individuals.

#### *Unsolicited information*

17. PLC may be provided with personal information without having sought it through the normal means of collection. This unsolicited information is often collected by:
  - (a) misdirected postal mail – Letters, Notes, Documents;
  - (b) misdirected electronic mail – Emails, electronic messages;
  - (c) employment applications sent to us not in response to an advertised vacancy; and
  - (d) additional information provided to us which was not requested.
18. Unsolicited information obtained by PLC will only be held, used and or disclosed if it is considered as personal information that could have been collected by normal means. If that unsolicited information could not have been collected by normal means then PLC will destroy, permanently delete or de-identify the personal information as appropriate.

### **Storage and security of personal information**

#### *Storage*

19. PLC stores personal information in a variety of formats including, but not limited to:
  - (a) electronic databases;
  - (b) hard copy files;
  - (c) paper files;
  - (d) personal devices, including laptop computers; and
  - (e) third party storage providers such as cloud storage facilities.
20. The College uses cloud computing service providers to store some personal information (which may include sensitive information) on their servers in the 'cloud'. These servers may be located in or outside Australia. This may mean that personal information may be stored or processed outside Australia.
21. Personal information collected about job applicants will be stored securely in a recruitment record, or converted to an employee record if the job applicant is successful in gaining employment with the College. If a job applicant is not successful, or declines a position at the College, the information stored in the recruitment record will be stored for 12 months, unless the job applicant advised PLC to destroy the records at an earlier time.

#### *Security Measures*

22. PLC takes all reasonable steps to protect the personal information it holds from misuse, loss, unauthorised access, modification or disclosure. These steps include, but are not limited to:
  - (a) appropriately restricting system and physical access to information based on staff roles and responsibilities;
  - (b) ensuring staff do not share personal passwords;
  - (c) storing hard copy files in lockable filing cabinets / lockable rooms;



- (d) ensuring access to PLC's premises are secured at all times;
  - (e) ensuring our IT and cyber security systems, policies and procedures are implemented and up to date;
  - (f) ensuring staff comply with internal policies and procedures when handling the information;
  - (g) undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime;
  - (h) the destruction, deletion or de-identification of personal information held that is no longer needed or required to be retained by any other laws.
23. The PLC public website may contain links to other third-party websites for convenience that are not operated or controlled by the College. PLC is not responsible for the information stored, accessed, used or disclosed on such websites. Third party websites should have their own privacy and security policies, and individuals are encouraged to read before supplying any personal information to them.

### **Responding to data breaches**

24. PLC will take appropriate, prompt action if the College has reasonable grounds to believe a data breach may have, or is suspected to have occurred. Depending on the type of data breach, this may include a review of internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC). If PLC are unable to notify individuals, the College will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

### **Access and correction of personal information**

25. An individual may request access to personal information that the College holds about them, and the College will respond within a reasonable time. PLC will take reasonable steps to ensure that all personal information held by it is up to date, complete, relevant, not misleading and accurate.
26. Individuals may submit a request to PLC for their personal information to be corrected.
27. Upon receiving a request to access or correct an individual's personal information, the College will take steps to verify the individual's identity before granting access or correcting the information.
28. In some circumstances it may be lawful for the College to refuse a person to have access to the personal information the College holds about them. If PLC rejects the request, the individual will be notified accordingly. Where appropriate, PLC will provide the reason/s for the decision. If the rejection relates to a request to change personal information, an individual may make a statement about the requested change and PLC will attach this to their record.

### **Complaints**

29. An individual can make a complaint about how PLC manages personal information by notifying the PLC Privacy Officer (contact details below) as soon as possible. PLC will respond to the complaint within a reasonable time (usually no longer than 30 days) and may seek further information in order to provide a full and complete response.
30. If the individual is not satisfied with PLC's response, they may refer the complaint to the OAIC. A complaint can be made using the OAIC online [Privacy Complaint form](#) or by mail, fax or email.
31. A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.
32. The College will maintain a record of all complaints and determinations and of the action taken to remedy any breach.



## Contact Details

33. PLC can be contacted about this Privacy Policy or about personal information generally, by:

- Emailing [privacy@plc.vic.edu.au](mailto:privacy@plc.vic.edu.au)
- Calling (03) 9808 5811
- Writing to our Privacy Officer at 141 Burwood Highway, Burwood 3125

34. If practical, individuals can contact us anonymously (i.e. without identifying themselves) or by using a pseudonym. However, if individuals choose not to identify themselves, PLC may not be able to give the information or provide the assistance that they might otherwise have received if it is not practical to do so.

For Office Use Only

Approved By:	Principal
Date Approved	July 2023
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*The PLC Privacy Policy is subject to change at any time. Please refer to our website <http://www.plc.vic.edu.au> for the latest version of the Privacy Policy.*