

Privacy Policy

1. Introduction and Purpose

IQRA College is bound by the Australian Privacy Principles (APP) contained in the Commonwealth Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012. The APP sets minimum standards which relate to the collection, security, storage, use, correction and disclosure of personal information and access to that information.

This Privacy Policy sets out how IQRA College manages personal information provided to or collected by the school.

IQRA College will, from time to time, review and update this Privacy Policy to take account new laws and technology, changes to the School's operations and practices, and to make sure it remains appropriate to the changing school environment.

2. Scope

This Policy applies to all staff at IQRA College, students, parents, and other individuals involved in business with the school.

3. Type of Information We Collect

The School collects and holds personal information including, but not limited to, health and other sensitive information about:

- Students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the School including:
 - Name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
 - Parent's education, occupation, and language background
 - Medical information (e.g., details of disability and/or allergies and details of any assistance the student receives in relation to those disabilities, medical reports, names of doctors)

- Conduct and complaint records, or other behaviour notes, school attendance and school reports
- Information about referrals to government welfare agencies
- Counselling reports
- Health fund details and Medicare number
- Any court orders
- Volunteering information (including Working With Children Checks)
- Photos and videos at school events.
- Job applicants, staff members, volunteers, and contractors, including:
 - Name, contact details (including next of kin), date of birth and religion
 - Information on job applications
 - Professional development history
 - Salary and payment information, including superannuation details
 - Medical information (e.g., details of disability and/or allergies and medical certificates)
 - Complaint records and investigation reports
 - Leave details
 - Photos and videos at school events
 - Workplace surveillance information
 - Work emails and private emails (when using work email address) and internet browsing history.
- Other people who come into contact with the School, including name and contact details and any other information the school deems necessary for the particular contact with the school.

Personal Information you Provide

The School will generally collect personal information held about an individual by way of electronic and/or paper forms filled out by Parents or students, face-to-face meetings and interviews, emails, telephone calls, CCTV cameras located at the School, photographs taken by the School, films and other recordings, online tools such as apps and other software used by the school like Sentral, Daymap and Linewize.

Personal Information Provided by Other People

In some circumstances, the School may be provided with personal information about you from a third party. For example, a report provided by a medical professional or a reference from another school.

The School will not retrieve personal information about you from someone else or a third party unless you (if have the capacity to consent) have consented. However, if required by law and if there is a serious threat to your life, health, safety or welfare, the information may be retrieved and shared without your consent.

Exception in Relation to Employee Records

Under the Privacy Act, the APP do not apply to an employee record. This Privacy Policy therefore does not apply to the School's treatment of an employee record where the treatment is directly related to a current or former employment relationship between the School and the employee.

Anonymity

The School is required to identify individuals with whom it interacts with to collect identifiable information about them to facilitate the delivery of schooling to its students and its educational and support services, to conduct the job application processes and to fulfil other obligations and requirements. However, in some circumstances, activities and interactions with the School may be made anonymously, where practicable. This may include, but not limited to, making an inquiry, complaint or providing feedback.

4. Use and Disclosure of Personal Information

The School will use personal information it collects 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, or to which you have consented. IQRA College will not use or disclose personal information about you unless you (if have the capacity to consent) have consented. However, if required and permitted by law, the information may be retrieved and shared without your consent.

The School will take reasonable steps to ensure that you know that the School has collected your information and the reason it has done so.

Government related identifiers

Government related identifiers such as driver's license or Medicare number will not be adopted, used, or disclosed unless one of the exceptions applies (e.g., the use or disclosure is reasonably necessary to verify the identity of the individual for the purposes of the School's functions or activities).

Students and Parents

The School's primary purpose of collection is to facilitate the delivery of schooling to students enrolled at the School (including educational and support services for the students), exercise its duty of care and perform necessary associated administrative activities which will enable the students to take part in all the activities of the School. This includes satisfying the needs of Parents, the needs of students and the needs of the School throughout the period the student is enrolled at the School.

The School uses personal information of students and Parents for the purposes of:

- Keeping Parents informed about matters related to their child(ren)'s schooling through Correspondence, newsletters and magazines;
- Day-to-day administration of the School;
- Looking after students' educational, social and medical well-being;
- Seeking donations and marketing for the School; and
- Satisfying the School's legal obligations and permitting the School to discharge its duty of care.

Where the School requests personal information about a student or Parent and the information requested is not provided, the School may exercise its discretion in not accepting the enrollment or continue the enrolment of the student or permit the student to take part in a particular activity.

Job Applicants and Contractors

In relation to personal information of job applicants and contractors, the School's primary purpose of collection is to assess and (if successful) engage the applicant or contractor, as the case may be.

The purposes for which the School uses personal information of job applicants and contractors may include:

- Administering the individual's employment or contract;
- Seeking donations and marketing for the School; and
- Satisfying the School's legal obligations.

Volunteers

The School obtains personal information about volunteers who assist the School in its functions or conduct associated activities, to enable the School and the volunteers to work together to confirm their suitability and to manage their visit.

Counsellors

The School contracts with external providers to provide counselling services to some students. The principal may require the Counsellor to inform him or her or other teachers of any issues the principal and the Counsellor believe may be necessary for the School to know for the well-being or development of the student who is counselled, or other students at the School.

Marketing and Fundraising

Marketing and donations play a role in supporting the future growth and development of the School. It plays an important part in ensuring that the School continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising, for example, the Parents Committee (or on occasions, external fundraising organisations). School publications like newsletters, magazines and yearbooks which include personal information and sometimes people's images, may be used for marketing purposes. *If you do not want to receive fundraising communications from us, please contact our Privacy Officer.*

Online Cloud Services

The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services

relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services.

Information Disclosure

Where the School is required to disclose personal information, including sensitive information held about you for educational, administrative and support purposes, the School will not do so without:

- Taking reasonable steps to ensure that you know the types of organisations to which the information is or will usually be disclosed to;
- Obtaining your consent (in some cases this consent will be implied); or
- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Given the school complies with this requirement, it may disclose your personal information, including sensitive information to:

- Schools and teachers including a new School to which a student transfers to facilitate the transfer of the student;
- Government departments (for policy and funding purposes);
- Medical practitioners;
- People providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
- Providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection and students with additional needs;
- Providers of learning and assessment tools;
- Assessment and educational authorities, including the Australian Curriculum Assessment and Reporting Authority (ACARA), NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN) and Progressive Achievement Tests (PAT);
- The Association of Independent Schools of South Australia (AISSA);
- Agencies and organisations to whom we are required to disclose personal information for

education, funding and research purposes;

- People providing administrative and financial services to the School;
- Recipients of School publications, such as newsletters, magazines and yearbooks;
- Anyone you authorise the School to disclose information to; and
- Anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Nationally Consistent Collection of Data on Students with Disability

The School is required by the Federal Australian Education Regulation (2013) and the Australian Education Act 2013 (Cth) to collect and disclose certain information on students with a disability under the Nationally Consistent Collection of Data (NCCD). The School provides the required information at an individual student level to authorities who comply with reporting, record keeping and data quality assurance obligations under the NCCD.

Note: Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

Sending and Storing Information Overseas

The School may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate a school exchange. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services and provide technical support.

This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

5. Treatment of Sensitive Information

The School will obtain consent to collect sensitive information, unless specified exemptions apply. Sensitive information collected 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 permitted by law.

6. Management and Security of Personal Information

The School understands its duties in respecting and preserving the privacy and confidentiality of students' and Parents' personal information. The School has in-place procedures to protect your personal information from misuse, interference and loss, un-authorised access, modification, or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

7. Correcting and Updating your Personal Information

It is important that the information we hold about you and the student/s is accurate, complete and up to date. Parents must provide the School with prompt notice of any change in their or their child/ren's personal information, including any change in their/their child's(ren)'s telephone number, residential address, or mailing address.

To make a request to access or update any personal information the School holds about you or your child, please contact the school's front office either by telephone or in writing (contact details are available on the School's website). The School may require you to verify your identity and specify what information you require to update.

The School 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 School will advise the likely cost in advance. If the School cannot provide you with access to that information, the School will provide you with written notice explaining the reasons for refusal, unless in doing so may breach the privacy of another person.

Students under the age of 16 will generally be able to access and update their personal information through their Parents. Students older than that may seek access and correction themselves. *Note: Exceptions that apply to these rights are set out in the applicable legislation.*

8. Unsolicited Information

The school may receive unsolicited personal information from you, or from contracted service providers, or someone else about you or someone or something else. The School will determine whether the collection is reasonably necessary for its functions and activities. If so, APPs 5-13 will apply. If not, the School will destroy or de-identify the personal information as promptly as practicable.

9. Consent and Rights of Access to the Personal Information of Students

The School respects every Parent's right to make decisions concerning their child's(ren)'s education. Generally, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's Parent. The School 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.

Parents may seek access to personal information held by the School about them or their child(ren) by contacting the School's front office by telephone or in writing. There may, however, be occasions where 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 School's duty of care to the student.

The School may, at its discretion, on the request of a student grant that student access to information held by the School 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 warrant it.

10. Breaches, Enquiries and Complaints

The School will take appropriate legal action to protect its Privacy and defend against any breach. A breach of this policy and the Australian Privacy Principles will be taken seriously and may result in

disciplinary action, up to and including expulsion and termination of employment. In the event where a Parent or a staff member wants to complain about a breach of this policy or the APP, parents or other individuals are required to submit a complaint through the IQRA College website. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made. If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

Where a data breach occurs, the School will take immediate steps to contain the breach and prevent reoccurrence. If it may cause serious harm to an individual, the School will advise the individual and the OAIC as soon as practicable. A "Privacy Notice of Breach" will be filled out by the staff aware of the breach and will be submitted to response team for further investigation. The response team will complete a 'Data Breach Response Plan' and will:

1. Confirm, contain and keep records of the data breach and do a preliminary assessment
2. Assess the data breach and evaluate the risks associated with the data breach including if serious harm is likely;
3. Consider data breach notifications; and
4. Take action to prevent future data breaches

The response team include members of the IT department, human resources, legal and the Principal.