

PRIVACY POLICY & COLLECTION NOTICES

Expectations of Toorak College staff & families are outlined below:

Purpose

The purpose of the Policy is to outline the Privacy policy and expectations of all Toorak College staff and families effective 12 March 2014. The policy covers Toorak College ABN 19 004 135 246 and its related entities "the School" which includes all of our School, Foundation and representative associations.

Policy Statement

Toorak College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. In relation to health records, the School is also bound by the Victorian Health Privacy Principles which are contained in the Health Records Act 2001 (Vic).

The School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to School's operations and practices and to make sure it remains appropriate to the changing School environment. We will notify you of changes to this policy by communication on the School website.

Collection of information

The type of information the School collects and holds includes (but is not limited to) personal information including 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;
- Job applicants, staff members, volunteers and contractors; and
- Other people who come into contact with the School.

Personal Information you provide

The School will generally collect personal information held about an individual directly from you unless it is unreasonable or impracticable to do so. The School will collect personal information by way of forms filled out (including online) by parents/guardians or students, face-to-face meetings, interviews, telephone calls, SMS, emails and through online activity on the School website, student/parent portal and social media. On occasions people other than parents/guardians and students provide personal information.

Personal Information provided by other people

In some circumstances the School may collect or be provided with personal information about an individual from a third party (Unsolicited information). Examples of when the School may obtain personal information from third parties could include:

- a report provided by a medical professional;
- a reference from another School
- the School checking security you are offering through public registers
- at your request through associated professional advisors

Where the School obtains information from a third party the School will take reasonable steps to notify you of the collection of that information. If the School receives unsolicited information that we could not have lawfully requested, we will destroy or de-identify the information if it is lawful to do so.

Child Information Sharing Scheme & Family Violence Information Sharing

The Victorian Child Information Sharing Scheme (CISS) and Family Violence Information Sharing (FVIS), under part 6A of the Child Wellbeing and Safety Act (2005) and the Child Wellbeing and Safety (Information Sharing) Regulations 2018 (Vic), enables the sharing of confidential information between authorised organisations to promote a child's wellbeing or safety.

Under this legislation Toorak College is an information sharing identity (ISE). Therefore the College can share information with, or seek information from, another ISE without the consent of the child or their family where it is relevant to the safety and wellbeing of children.

Wherever appropriate, safe and reasonable to do so, the views of the child and /or their parents to the proposed information sharing is sought from the child or young person and/or their parents/carers

It is the College's policy to follow the [Child Information Sharing Scheme Ministerial Guidelines](#) whenever Information is to be shared under this Policy.

Website Activity

Toorak College utilises technology called cookies when you visit our site. Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files.

When a server uses a web browser to read cookies they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website.

Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms.

Most Internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. There are also software products available that can manage cookies for you.

Toorak College also uses Google Analytics for data collection from our Website. Information analysed includes your IP address, browser and version, operating system, date and time of access and the site from which a user

came. This information is identified and stored as anonymous statistics by Google Analytics. This information is anonymous and cannot be used to identify specific individuals, and is only used for website and system administration, research and development, anonymous user analysis and to provide accurate statistics in the form of aggregated data. More information about Google Analytics can be located on the Google Analytics website. Google Analytics can be prevented from storing your usage data by installing the Google Analytics Opt-out Browser Add-on.

Exception in relation to Employee Records

Under the Privacy Act and Health Records Act 2001 (Vic), the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy 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 employee.

Use of Personal Information

The School will use personal information it collects from you for the primary purpose of collection as set out below, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

Students and Parents/Guardians

In relation to personal information of students and parents/guardians, the School's primary purpose of collection is to enable the School to provide schooling for the student. This includes satisfying both the needs of parents/guardians, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School.

The purposes for which the School uses personal information of prospective, current and past students and parents/guardians include:

- to keep Parents/Guardians informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after students' educational, social and medical well-being;
- seeking donations and marketing for the School;
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

In some cases where the School requests personal information about a student or parent/guardian, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.



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Job applicants, Staff members and Contractors

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

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

- administering the individual's employment or contract, as the case may be;
- for insurance and WorkCover purposes;
- seeking funds and marketing for the School; and
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

Volunteers

The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities such as alumni and parent associations, to enable the School and the volunteers to work together.

Marketing and Fundraising

The School treats marketing and seeking donations for the future growth and development of the School as an important part of 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 School's Foundation, the Parents' Association and the Old Collegians' Association.

Parents/guardians, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

We may wish to refer to you when marketing the School. We will only refer to you with your prior written consent and will only disclose personal information in marketing material to the extent to which you have permitted.

You may opt out at any time if you do not wish to receive material used for the sole purpose of marketing promotional information by notifying the School in writing or where applicable by clicking the "unsubscribe" button on promotional messages.

Disclosure of Information

The School may disclose personal information, including sensitive information, held about an individual to:

- another School;
- government departments;
- medical practitioners;

- people providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- recipients of School publications, like newsletters and magazines;
- Parents/guardians;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

Treatment of Sensitive Information

In referring to 'sensitive information', the School means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information, health information and biometric information about an individual.

Sensitive information 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 allowed by law.

Management and Security of Personal Information

The School stores your personal information in paper and electronic form. The School's staff are required to respect the confidentiality of students' and parents'/guardians' personal information and the privacy of individuals. The School has in place steps to protect the personal information the School holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

The School can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. Where overseas organisations are required to disclose information we share with them under a foreign law the School will not be responsible for that disclosure.

The School conducts its operations in Australia and overseas. We may therefore need to share personal information with overseas providers of services and programs to the School. This can include activities such as the Beyond Boundaries Program, Student Exchange programs and activities associated with international enrolments.

The School will only keep your information for as long as we require it for our purposes or as required by law. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.



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Updating Personal Information

Under the Commonwealth Privacy Act and the Health Records Act 2001 (Vic), an individual has the right to obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents/guardians, but older pupils may seek access and correction themselves.

There are some exceptions to the rights set out in the applicable legislation.

To make a request to access or update any personal information the School holds about you or your child, please contact the School in writing. The School may require you to verify your identity and specify what information you require. 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 we cannot provide you with access to that information, we will provide you with written notice explaining the reason for refusal.

Rights of access to the Personal Information

The School respects every parent's/guardian's right to make decisions concerning their child'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 parents/guardians. The School will treat consent given by parents/guardians as consent given on behalf of the student, and notice to parents/guardians will act as notice given to the student.

Parents/guardians may seek access to personal information held by the School about them or their child by contacting the Principal's Assistant. However, there will be occasions when 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/guardians. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

Anonymity or Pseudonymity

If you make a general enquiry of the School, you can choose to do this anonymously or use a pseudonym but only where reasonable.

Enquiries

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles please contact the Director of Business. 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.



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Mount Eliza

Toorak College Standard Collection Notice

1. The School collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a pupil's enrolment at the School. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the School to provide schooling to the pupil and to enable them to take part in all the activities of the School.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the school to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
4. Health information about pupils is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may ask you to provide medical reports about pupils from time to time.
5. The School from time to time discloses personal and sensitive information to others for administrative and educational purposes, including to facilitate the transfer of a pupil to another school. This includes to other schools, government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, coaches, volunteers and counsellors.
6. Personal information collected from pupils is regularly disclosed to their parents or guardians.
7. The School may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. The School's Privacy Policy sets out how parents or pupils may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the pupil, or where pupils have provided information in confidence.
9. The School Privacy Policy also sets out how you may complain about a breach of privacy and how the School will deal with such a complaint.
10. As you may know the School from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.

11. On occasions information such as academic and sporting achievements, pupil activities and similar news is published in School newsletters, magazines and on our website. Photographs of pupil activities such as sporting events, school camps and school excursions may be taken for publication in School newsletters, magazines and on our website. The School will obtain separate permissions from the pupils' parents or guardian prior to publication. We may include pupils' and pupils' parents' contact details in a class list and School directory.
12. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose this information to third parties.

Toorak College Collegians Collection Notice

1. The Toorak Collegians may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of Toorak College and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the Toorak Collegians.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by Toorak College to assist in its fundraising activities.
4. The Toorak Collegians may publish details about you in School publications and on the School's website. If you do not agree to this you must advise us now.
5. The School's Privacy Policy contains details of how you may seek access to personal information collected about you or how you may complain about a breach of the APP's.
6. The School may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
7. If you provide personal information to us about other people, we encourage you to inform them of the above matters.

Toorak College Employment Collection Notice

1. In applying for this position you will be providing Toorak College with personal information. We can be contacted at Po Box 150 Mount Eliza, Vic 3930, (03) 9788 7200.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy contains details of how you may complain about a breach of the APPs or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
4. We will not disclose this information to a third party without your consent.
5. We are required to conduct a Police Check and Working With Children Check under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. The School may store personal information in the 'Cloud', which may mean that it resides on servers which are situated outside Australia.
7. If provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.

Toorak College Volunteer an Contractor Collection Notice

1. In applying to provide services to the School, you will be providing Toorak College with personal information. We can be contacted at Po Box 150 Mount Eliza, Vic 3930, (03) 9788 7200.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information.
4. The School's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the APPs.
5. We will not disclose this information to a third party without consent.

6. We are required to conduct a Police Check and Working With Children Check under Child Protection laws. We may also collect personal information about you in accordance with these laws.
7. The School may store personal information in the 'Cloud', which may mean that it resides on servers which are situated outside Australia.
8. If provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.

Document Review

This document was prepared in July 2021.