

PRIVACY POLICY

Context

This policy sets out the personal information handling practices of Sports College South Australia ('SCSA' or 'the College') and assists SCSA to manage personal information in an open and transparent way. This policy gives students, staff and all those engaging with SCSA a better and more complete understanding of the types of personal information that the College holds and the way that the College handles that information.

SCSA is bound by the Australian Privacy Principles contained in the '*Commonwealth Privacy Act 1988*' and *Commonwealth Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

Application

This policy applies to:

- Personal information collected or handled by SCSA.
- All staff (past and present), students, parents and alumni

A reference to staff includes contractors and volunteers.

Under the '*Commonwealth Privacy Act 1988*', the Australian Privacy Principles do not apply to an employee record. Consequently, this policy does not apply to an employee record when directly related to a current or former employee.

Policy Content

What is Personal Information?

Personal information is information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

What Kinds of Personal Information?

The kinds of personal information that SCSA may collect and hold about an individual includes, but is not limited to:

- Name
- Address
- Telephone number
- Email address
- Photographs
- Bank account details
- Assessment results
- Sex
- Marital status; and
- Parent/guardian details

SCSA also collects data from stakeholders about the services provided by SCSA. These surveys are voluntary and respondents may exercise their right of anonymity.

What is Sensitive Information?

Sensitive information is personal information about an individual's racial or ethnic origin, political opinions, membership or political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, sexual preferences, criminal record or health information.

What Kinds of Sensitive Information?

The kinds of sensitive information that SCSA may collect and hold about an individual includes but is not limited to:

- Health or disability information
- Racial or ethnic origin; or
- Working with children check information

How SCSA Collects Personal Information

It is usual practice for SCSA to collect personal information directly from the individual. In many circumstances the student's parent/carer will be required to have input (most commonly this is for students under the age of 18 years).

Sensitive information will only be collected with the individual's consent and where the collection is reasonably necessary for one or more of SCSA's functions or activities (unless a legal exemption applies).

The Purposes for Which SCSA Collects and Uses Personal Information

SCSA will collect, hold, use and disclose personal information about an individual that is reasonably necessary for one or more of its functions or activities.

SCSA's functions or activities include:

- Providing educational services to students in an independent school environment. SCSA's functions or activities are sometimes delivered via enrolment with an external Registered Training Organisation.
- The employment of staff and other related services.
- Reporting to all state or national regulators,
- Looking after students' social and medical wellbeing,
- Promotion and marketing of the school and
- In circumstances related to public interest, such as law enforcement and public or individual safety.

In relation to the personal information of staff, SCSA's primary purpose of collection is to facilitate employment and administer the staff member's benefits and other entitlements.

Who Might SCSA Disclose Personal Information to?

As part of its functions or activities, SCSA may disclose personal information, including sensitive information to other individuals and organisations including:

- A student's parent and/or guardian (unless otherwise requested in writing);
- professional services contractors (including IT consultants, insurers, accountants, lawyers) that assist SCSA to conduct its functions or activities;
- medical practitioners and other healthcare or emergency service providers (in part this falls within the category requiring consent or disclosure by law);
- industry organisations related to the functions or activities of SCSA such as the Sporting partners;
- any other individual or organisation SCSA is required to disclose the information to by law.

Sending Information Overseas

SCSA does not usually send personal information about an individual outside Australia. In the unusual event that this occurs, SCSA will comply with the Australian Privacy Principles.

Management and Security of Personal Information

SCSA staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. All staff members are bound by a Confidentiality Agreement as part of their employment obligations.

The school has in place steps to protect the personal information it holds from interference, misuse, loss, unauthorised access, modification and disclosure. Personal information may be held in paper and electronic files. We take all reasonable steps to ensure that the information we collect is stored securely.

Survey data is collected in an electronic format. SCSA destroys personal information by a secure service provider.

The school is required by law to retain records for certain periods of time depending on the type of record and will comply with its legal obligations. These records may contain personal information of individuals.

Updating and Accessing Personal Information

SCSA will take reasonable steps to ensure that the personal information it holds is accurate, complete and up to date. Subject to legal exceptions, an individual may seek access to and seek the correction of personal information SCSA holds about them. Access and correction requests can be made to SCSA directly.

Access by a Parent or Guardian

For a student enrolled in a Senior Secondary Program personal information may be collected, used and disclosed to a student's parent or legal guardian. If the student has sufficient maturity and understanding personal information may be collected, used and disclosed directly with the student.

Before providing information, a staff member must be satisfied:

- Of the identity of the individual seeking the information; and
- That the individual is entitled to access

Data Breach

A data breach is when personal information held by the school is lost or subjected to unauthorized access, modification, disclosure, or other misuse or interference.

Data breaches can occur in a number of ways. Some examples include:

- lost or stolen laptops, removable storage devices, or paper records containing personal information
- digital storage media being disposed of without erasing contents
- databases containing personal information being 'hacked' into or otherwise illegally accessed by individuals outside of the school
- employees, volunteers or contractors accessing or disclosing personal information outside the requirements or authorization of their employment or association to the school
- SCSA mistakenly providing personal information to the wrong person

Possible data breaches may be identified in a number of ways, internally (by staff, students, contractors etc) or externally.

Complaints & Monitoring

You may complain about a breach of privacy:

- Student concerns, complaints and appeals can be raised under the '*SCSA Concerns, Complaints and Appeals Policy*'
- Staff concerns, complaints and appeals can be raised under the '*SCSA Staff Formal Complaint Resolution Process*'.

While SCSA encourages its staff and students to raise concerns with SCSA directly, external privacy complaints can be made to the '*Office of the Australian Information Commissioner*'.

Referenced Documents

- Privacy Act 1988 (Commonwealth) and Commonwealth Privacy Amendment (Enhancing Privacy Protection) Act 2012.
- Concerns, Complaints and Appeals Policy
- Staff Formal Complain Resolution Process
- Information Sharing Guidelines - AISSA

Policy History

Version	Policy Owner	Policy Category	Approval Date	Effective Date	Summary of Changes
V1.0	Principal	Resourcing & Financing	22/11/2018	22/11/2018	Initial Implementation
V1.1	Principal	Resourcing & Financing	04/09/2020	04/09/2020	Minor amendments. Formatting
V1.2	Principal	Resourcing & Financing	29/10/2024		Amendments, Rebranding