



# Privacy Policy

ADOPTED BY THE  
DOWNLANDS COLLEGE BOARD  
20 OCTOBER 2016

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## 1. Introduction

This Privacy Policy sets out how Downlands College (College) manages personal information provided to or collected by it, and how to contact us if you have any privacy concerns.

The College is bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

## 2. What kinds of personal information does the College collect?

The College will collect different types of personal information from you, depending on how you interact with us. The type of information the College collects and holds includes (but is not limited to) personal information about:

- Students and Parents and/or guardians ('Parents') before, during and after the course of a Student's enrolment at the College;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the College.

The types of personal information the College collects may include your name, contact details, financial details, photographs, film, recordings or any other digital representation.

The College will only collect sensitive information (which is a category of personal information that includes information about things such as an individual's health, religious beliefs and racial or ethnic origin) from an individual with their consent obtained in the Enrolment Application and Conditions of Enrolment and which is reasonably necessary for one of the College's functions.

The College may collect personal information because we are required or authorised by an Australian law or court or tribunal order to do so. The College will tell you if this is the case and let you know the details of the law, court or tribunal order.

We will assume that, unless you tell us otherwise, you consent to the collection of the information that you provide to us (either directly or indirectly) for use and disclosure by us in accordance with this Privacy Policy.

**Personal Information you provide:** The College will generally collect personal information directly from the individual such as through the completion of forms by Parents or Students, face-to-face meetings and interviews, emails and telephone calls.

**Personal Information collected from third parties:** In some circumstances the College may collect personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another College.

**Anonymity:** If it is lawful and practicable to do so, the College may offer individuals the opportunity of dealing with the College anonymously or by using a pseudonym. For example, when an individual makes a general enquiry about the College. However, in some cases where the College requests personal information about a Student or Parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the Student, or permit the Student to take part in a particular activity.

### 3. How will the College use the personal information you provide?

The College 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 by you, or to which you have consented.

**Students and Parents:** In relation to personal information of Students and Parents, the College's primary purpose of collection is to enable the College to provide schooling for the Student. This includes satisfying the needs of Parents, the needs of the Student and the needs of the College throughout the whole period the Student is enrolled at the College. The purposes for which the College collects, uses, holds and discloses personal information of Students and Parents include:

- to keep Parents 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 wellbeing;
- seeking donations;
- conducting marketing and promotional purposes;
- to enable past pupils to be in contact with those from their year group via the Downlands Past Students Association;
- to enable Past Student reunion organising committees to conduct Year Group reunions as required; and
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

**Volunteers:** The College also collects, uses, holds and discloses personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable the College and the volunteers to work together.

**Marketing and fundraising:** The College treats marketing and the seeking of donations for the future growth and development of the College as an important part of ensuring that the College continues to provide a quality learning environment in which both Students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example the Downlands Past Students Association or, on occasions, external fundraising organisations.

### 4. Who might the College disclose personal information to?

The College may use your personal information to send you fundraising information and College publications (such as newsletters and magazines, websites and social media platforms). You can contact us at any time (see details below) if you no longer wish to receive marketing or fundraising materials from us.

There are a range of people and organisations to whom the College may disclose personal information. The particular party the College discloses personal information to will depend on the dealings the individual has with us. For example, the College may disclose personal information, including sensitive information, held about an individual to:

- another school;
- government departments;
- medical practitioners;

- people providing services to the College, including specialist visiting teachers, counsellors and sports coaches;
- recipients of College publications, such as newsletters and magazines, marketing and promotional material including on websites and through social media platforms;
- Parents;
- anyone you authorise the College to disclose information to;
- service providers who provide us with business, technology, marketing, operational, professional and other services; and
- anyone to whom we are required to disclose the information to by law.

**Sending information overseas:** The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with technology service providers which are situated outside Australia or to facilitate a College exchange. We only disclose personal information to our overseas service providers when it is necessary for the services they provide to us.

The countries in which these overseas service providers are likely to be located is Singapore, Canada and the United States of America.

When we disclose your personal information overseas, we are required to take measures to ensure that your information will be protected.

## 5. Management and security of personal information

We mostly hold personal information electronically in our IT systems, secure servers and databases, but we also hold personal information in paper records. The College has in place steps to protect the personal information the College holds from misuse, interference and loss, unauthorised access, modification or disclosure including locked storage of paper records and password access rights to computerised records. The College's staff are also required to respect the confidentiality of Students' and Parents' personal information and the privacy of individuals.

## 6. Access and correction of personal information

An individual has the right to request access to any personal information which the College holds about them and ask the College to correct any inaccuracies.

To make a request to access or update any personal information the College holds about you or your child, please contact the Principal in writing (see details below). The College will require you to verify your identity and specify what information you require. The College cannot give you information about anyone else.

Making a request is free; however, the College may charge a reasonable fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. The fee will not be excessive, and the College will advise the likely cost in advance.

We will allow access or make the changes requested unless we consider the Privacy Act or another relevant law requires us to withhold the information, or not make the changes. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal. If we refuse you access or to correct your personal information, you can make a complaint about this, by following the complaint procedures in this Privacy Policy (see details below).

## 7. Consent and rights of access to the personal information of Students

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

The College 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 College about

them or their child by contacting the Principal (see details below); 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 College's duty of care to the Student.

The College may, at its discretion, on the request of a Student, grant that Student access to information held by the College 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 so warrant.

## 8. Enquiries and complaints

If you would like further information about the way the College manages the personal information it holds, or wish to complain that you believe that the College has breached the Australian Privacy Principles please contact:

The Principal, Downlands College  
07 4690 9500  
72 Ruthven Street, Toowoomba Q 4350  
[principal@downlands.qld.edu.au](mailto:principal@downlands.qld.edu.au)

The College will investigate any complaint, and respond to you as soon as we can. We will try to do this within 10 working days of receiving your complaint. If this is not possible, we will contact you and let you know when we will respond to your complaint. We will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

The College takes any privacy complaint seriously and will deal with all complaints fairly and promptly; however, if you are not satisfied with our response to your complaint you can refer your complaint to the Office of the Australian Information Commissioner (in writing):

Office of the Australian Information Commissioner (OAIC)  
GPO Box 5218, Sydney NSW 1042  
1300 363 992  
1800 620 241  
[privacy@privacy.gov.au](mailto:privacy@privacy.gov.au)

## 9. Using other websites

The College's website may contain links or references to other websites to which this Privacy Policy may not apply. You should review the Privacy Policy of each of those websites and assess whether those policies are acceptable to you before using those websites.

## 10. Changes to this Privacy Policy

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

This Privacy Policy was last updated on 21 September 2016.

Any changes to our Privacy Policy will be published on our website. Changes to this policy will also be advised via the College Newsletter.