



# MASADA COLLEGE

## Privacy Policy

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<b>APPLIES TO</b>	Whole College
<b>CONTACT PERSON</b>	College Principal
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## Introduction

Masada College is committed to protecting the privacy of personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). We also comply with the Health Records and Information Privacy Act 2002 (NSW) in relation to health information.

This Privacy Policy explains how we collect, use, store, disclose and manage personal information, and your rights in relation to that information.

## About this Policy

This Privacy Policy applies to the personal information we collect about:

- Current, past and prospective students and their parents/guardians
- Staff members, contractors, and volunteers
- Job applicants
- Visitors to our premises and website
- Any other individuals who interact with the College
- Important Note: This policy does not apply to employee records where the treatment is directly related to current or former employment relationships, as these are exempt under the Privacy Act.

## What Personal Information We Collect

### Students and Parents/Guardians

We collect personal information including:

#### Identity and Contact Information:

- Full name, date of birth, gender, address, phone numbers, email addresses
- Emergency contact details and next of kin information
- Previous schools attended and academic records
- Cultural background, language spoken at home, religious affiliation

#### Health Information

- Medical conditions, disabilities, allergies, dietary requirements
- Immunisation records and medical certificates
- Mental health information relevant to student care
- Medicare number and health fund details

#### Educational Information

- Academic results, assignments, tests and examinations

- Attendance records and absence explanations
- Student behaviour records and disciplinary matters
- Reports from educational specialists or support staff
- Extra-curricular participation records

### Educational Information

- Parent/guardian occupation, education background, contact details
- Family Court orders (where applicable)
- Child protection or welfare agency involvement
- Sibling information where relevant

### Visual Records

- Photos and videos of students at school events, activities, and for identification purposes
- CCTV recordings from school premises

## Students and Parents/Guardians

### Identity and Employment Information

- Full name, address, date of birth, contact details, emergency contacts
- Employment history, qualifications, professional development records, and working with children checks
- Reference checks and background screening results
- Salary, superannuation and payment details

### Health and Safety Information

- Health information relevant to work duties
- Medical certificates and workers' compensation claims
- Workplace injury records

### Work-Related Information

- Performance reviews and professional development plans
- Leave records and workplace conduct matters
- Email communications and internet usage logs (where monitored)
- Photos and videos at College events

## How We Collect Personal Information

### Direct Collection

We usually collect personal information directly from you through:

- Enrolment forms and applications
- Face-to-face meetings and interviews
- Phone calls and email communications
- Online forms and surveys
- Student information systems and learning management platforms

### Third Party Collection

We may also collect personal information from:

- Previous schools and educational institutions
- Medical professionals and healthcare providers
- Government departments and agencies
- Educational assessment authorities
- Child protection services
- References provided by job applicants

### Surveillance and Monitoring

- CCTV cameras installed on school premises for security purposes
- Email and internet monitoring for staff (in accordance with our IT policies)
- Learning analytics from educational technology platforms

## Why We Collect Personal Information

### Primary Purposes

#### For Students and Parents:

- Providing educational services and managing student enrolment
- Ensuring student health, safety and wellbeing
- Meeting our duty of care obligations
- Complying with legislative and regulatory requirements
- Managing day-to-day school operations

#### For Staff and Contractors:

- Recruitment, employment and contract management
- Meeting workplace health and safety obligations
- Professional development and performance management
- Payroll and superannuation administration

### Secondary Purposes

We may also use personal information for:

- Internal communications (newsletters, announcements)

- School marketing and promotional activities
- Fundraising activities (with appropriate consent)
- Statistical analysis and reporting
- Legal compliance and dispute resolution

## How We Use and Disclose Personal Information

We use and disclose personal information only for the purposes for which it was collected, or for related secondary purposes that would be reasonably expected, or with your consent.

### Permitted Uses Without Consent

Under the Privacy Act, we may use or disclose personal information without consent when:

- Required or authorised by law
- Necessary to prevent or lessen a serious threat to life, health or safety
- For law enforcement activities
- For child protection purposes

## Who We May Disclose Personal Information To

We may disclose personal information to:

### Educational Partners:

- Other schools (including when students transfer)
- Educational authorities and assessment bodies (ACARA, NAPLAN administrators)
- Specialist education service providers and visiting teachers

### Government Bodies:

- Department of Education and other relevant government agencies
- Child protection services
- Law enforcement agencies (when required by law)

### Health and Support Services:

- Medical practitioners and healthcare providers
- Counselling and psychology services
- Student support specialists

### Service Providers:

- IT service providers and cloud storage companies
- Financial services providers
- Legal advisers and auditors
- Marketing and communications providers
- Transport providers

### Other Recipients:

- Parent/guardian organisations and committees
- Alumni organisations for networking and fundraising
- Insurance providers
- Anyone authorised by you to receive the information

## Automated Decision-Making

**Notice About Automated Processes:** The College may use automated systems to help make decisions about students, such as:

- Learning analytics platforms that track academic progress
- Automated assessment and feedback systems
- Student information systems that generate reports

Where automated decision-making significantly affects students, we will:

- Inform you about the use of such systems
- Provide meaningful information about the logic involved
- Allow you to request human review of automated decisions

## Overseas Disclosure of Personal Information

We may disclose personal information to overseas recipients in the following circumstances:

### Cloud Storage and IT Services:

Personal information may be stored on servers located overseas through our use of cloud-based services including:

- Google Workspace for Education (servers may be located in various countries)
- Learning management systems and educational platforms
- Student information management systems

### Educational Programs:

- Student exchange programs
- International educational partnerships
- Overseas school excursions and trips

### Countries Where Recipients May Be Located:

Personal information may be disclosed to recipients in:

- United States (cloud services, educational platforms)
- European Union countries
- Other countries as required for specific educational programs

We take reasonable steps to ensure overseas recipients comply with Australian privacy standards through contractual arrangements where practicable.

## Data Security

We implement appropriate technical and organisational measures to protect personal information from:

- Unauthorised access, use, modification or disclosure
- Misuse, interference and loss
- Cyber security threats and data breaches

### **Our Security Measures Include:**

- Physical security for paper records (locked filing cabinets in secure rooms)
- Digital security through password protection and access controls
- Staff training on privacy and information security
- Regular review of access permissions
- Secure disposal of records when no longer needed
- Incident response procedures for data breaches

### **Your Security Responsibilities:**

- Keep login credentials confidential
- Report suspected security incidents promptly
- Follow our acceptable use policies for school systems

## Data Retention

We retain personal information only for as long as necessary for the purposes for which it was collected, or as required by law.

### **Retention Periods:**

- Student academic records: Permanently retained for transcript purposes
- Student welfare records: 7 years after leaving school (or until age 25, whichever is later)
- Staff employment records: 7 years after employment ends
- Financial records: 7 years
- Child protection records: As required by relevant legislation

Records are securely destroyed when retention periods expire, unless we are required to retain them for legal purposes.

## Your Rights - Access and Correction

Under Australian privacy law, you have the right to:



## Access Your Information

- Request access to personal information we hold about you
- Receive information in an accessible format
- Understand how we have collected and used your information

## Correct Your Information

- Request correction of inaccurate, incomplete or out-of-date information
- Have corrections made at no charge
- Have correction requests considered promptly

## Making a Request

To access or correct personal information:

1. Contact our Privacy Contact Person (Head of Business Operations) using the details below
2. Provide sufficient information to verify your identity
3. Specify what information you are seeking to access or correct

**Processing Timeline:** We will respond to your request within 30 days. If we need more time, we will notify you and explain the delay.

**Fees:** We may charge a reasonable fee for providing access to information, but will not charge for making a request or correcting information. We will advise you of any fees before processing your request.

## When We May Refuse Access

We may refuse access to personal information if:

- Providing access would pose a serious threat to someone's life, health or safety
- It would have an unreasonable impact on others' privacy
- The request is frivolous or vexatious
- Legal proceedings are involved
- Law enforcement activities would be prejudiced

# Student Privacy Rights

## Parental Rights and Student Maturity

- Generally, parents/guardians make privacy decisions for students under 18
- We may allow mature students to make their own privacy decisions in appropriate circumstances
- Students aged 15+ may have greater privacy rights regarding health information

## Balancing Privacy Interests

When managing student information, we consider:

- The student's age and maturity
- The nature of the information
- Potential impact on the student's wellbeing
- Our duty of care obligations
- Family circumstances and relationships

## Withholding Information from Parents

There may be circumstances where we cannot provide student information to parents, such as when:

- A mature student has specifically requested confidentiality
- Disclosure would breach our duty of care to the student
- Child protection concerns exist
- Legal restrictions apply

# Complaints and Enquiries

## Internal Complaints Process

If you have concerns about our handling of personal information:

1. Initial Contact: Contact our Privacy Contact Person (Head of Business Operations) to discuss your concerns
2. Formal Complaint: Submit a written complaint if the matter cannot be resolved informally
3. Investigation: We will investigate your complaint and respond within 30 days
4. Resolution: We will work with you to resolve the issue appropriately

## External Complaints

If you are not satisfied with our response, you may lodge a complaint with:

### **Office of the Australian Information Commissioner (OAIC)**

- Phone: 1300 363 992
- Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- Website: [www.oaic.gov.au](http://www.oaic.gov.au)

### **NSW Privacy Commissioner (for health information complaints):**

- Phone: 1800 IPC NSW (1800 472 679)
- Website: [www.ipc.nsw.gov.au](http://www.ipc.nsw.gov.au)

# Contact Information

### **Privacy Contact Person (Head of Business Operations):**

- Email: [PrivacyOfficer@staff.masada.nsw.edu.au](mailto:PrivacyOfficer@staff.masada.nsw.edu.au)
- Phone: (02) 9449 3744

- Address: Masada College, [School Address]

## Policy Updates

We may update this Privacy Policy from time to time to:

- Reflect changes in our practices
- Comply with new legal requirements
- Address new privacy risks or technologies

### Notification of Changes:

- Significant changes will be communicated through our website and school newsletters
- The current version will always be available on our website
- We will indicate when the policy was last updated

Your Continued Relationship with Us: By continuing to engage with the College after policy updates, you acknowledge your acceptance of the revised privacy practices.

### Legal Entities Covered by This Policy

This Privacy Policy applies to the following entities within the Masada College group:

- Masada College (ABN: 61 000 544 758)
- Masada College Jewish Day School (ABN: 29 003 036 995)
- Masada College Parents & Friends Association (ABN: 55 965 892 430)
- HAF Pty Ltd (ABN: 66 767 476 579)

This policy was last updated: May 2025

This Privacy Policy has been prepared to comply with the Privacy Act 1988 (Cth), the Australian Privacy Principles, and the Health Records and Information Privacy Act 2002 (NSW).