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Privacy Policy

Introduction

This policy is designed to give you a reater understanding of how The Kilmore International School collects, uses, discloses and otherwise handles your personal information.

Your privacy is important to us, and we are committed to protecting your privacy, in accordance with applicable Australian privacy laws.

This policy will be regularly reviewed and updated to take account of new laws and technology, changes to TKIS's operations and practices, and to ensure the policy is appropriate for the changing TKIS environment.

TKIS is required to comply with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, security, accessibility and disposal.

We are also required to comply with more specific privacy legislation in some circumstances, such as:

- Applicable State and Territory health privacy legislation (including the Victorian Health Records Act 2001) when we collect and handle health information in the relevant jurisdiction
- The Spam Act

Definition

Personal Information: Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

Sensitive Information: Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection, such as health information about an individual, information relating to a person's racial or ethnic origins, political opinions, religion, sexual preferences or criminal record. We only collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- we are required or authorised by or under law (including applicable privacy legislation) to do so.

For example, we collect health information in relation to students so that we can look after the student's educational, social, emotional and medical wellbeing.

Purpose

Collection of personal information: The main purposes for which we collect, hold, use and disclose personal information are as follows.

- to provide proper schooling and care for our students
- to keep Parents and Guardians informed about their child's progress and wellbeing
- to provide proper administration of the School
- to promote the School and seek donations to the School or specific programs of the School including through direct marketing, campaigns (including online), events and competitions
- to perform research and statistical analysis
- to protect the security of our offices, staff, students, visitors and the property held on our premises
- to recruit staff and contractors.

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or:

- which are required or authorised by or under law (including, without limitation, privacy legislation); and
- for which you have provided your consent.

Direct marketing: We may use your personal information to let you know about our school activities (including promotions, campaigns and events), either where we have your express or implied consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including mail, email, SMS or telephone.

Opting out: If you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, by:

- contacting us (either via the contact details provided on the communication received, or via the details at the end of this Policy)
- advising us if you receive a marketing call that you no longer wish to receive these calls, or
- using the unsubscribe facility that we include in our commercial electronic messages (such as newsletter emails and SMS) to opt out of receiving those messages.

Notification of source: If we have collected personal information that we use to send you marketing communications from a third party, you can ask us to notify you of our source of information, and we will do so, unless this is unreasonable or impracticable.

Personal information collected: The type of personal information that we collect and hold depends on the type of dealings you have with us. It includes but is not limited to:

- information about students (including photographs), parents and/or guardians ("Parents"), before, during and after the course of a student's enrolment at the School
- information about children and adults associated with participation in TKIS's publicly offered associated programs
- updates of the above information
- information about applicants for employment, staff members, volunteers and service providers
- medical information
- information about people who send us an enquiry, provide us with feedback or make a complaint.

Methods of collection: We collect personal information in a number of ways, including:

- in person (for example, at School information mornings or at TKIS's Reception)
- through the TKIS website and other website/s of those programs and activities directly associated with the School (for example TKIS Cambodia Camp)
- over the telephone
- through hard copy and electronic correspondence (such as letters, faxes and emails)
- forms both hard copy and electronic (for example, Enrolment Application and CareMonkey)
- from third parties, including doctors and other health professionals.

Unsolicited information: Unsolicited personal information is personal information we receive that we have taken no active steps to collect (such as an employment application). We may keep records of unsolicited personal information if the Privacy Act permits; for example, if the information is reasonably necessary for one or more of our functions or activities. If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

Collection of information through our website: When you visit our website or TKIS associated program websites ("TKIS websites"), some of the information that is collected about your visit is not personal information, as it does not reveal your identity. Site visit information/Web Analytics: For example, we record your server address (IP address), the date, time and duration of your visit, the pages you visited, any documents you downloaded, the previous site you visited and the type of device, browser and operating system you used.

We use and disclose this information in anonymous, for purposes including statistical analysis and to assist us to improve the functionality and usability of TKIS websites. You are not individually identified, however we reserve the right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our websites, or where we are otherwise required or authorised by law to do so.

Options for not sharing your information: We will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name.

For example, you can access our websites and make general phone queries without having to identify yourself.

In some cases however, if you don't provide us with your personal information when requested, we may not be able to provide you with the service that you are seeking.

Sharing your personal information: We may share your personal information with third parties where appropriate for the purposes set out under why we collect personal information, including but not limited to:

- students
- parents and guardians of students
- other educational institutions, statutory organisations, and government
- health professionals
- third parties providing services to the School including visiting teachers, sport and other co-curricular
- third parties undertaking compliance reviews or audits of the School
- teachers
- financial institutions for payment processing
- recipients of our newsletters and magazines
- referees whose details are provided to us by job applicants
- our contracted service providers, including:

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

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 education. Generally, the School will refer any request for consent and notices in relation to the personal information of a student to the student's Parents or Guardians. The School will treat consent given by Parents or Guardians as consent given on behalf of the student, and notice to Parents or Guardians will serve as notice given to the student.

Parents or Guardians may seek access to personal information held by the School about them or their child by contacting the Business Manager. 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 or Guardians. This would normally be done only when the student involved has reached 18 years of age, but the School could do so in other circumstances when the maturity of the student and/or the student's personal circumstances so warranted.

Cross border disclosure of personal information: We may disclose personal information to third parties located overseas in the following situations:

- to parents or guardians of students whose permanent or temporary address is overseas
- to third parties assisting in the planning or delivery of overseas tours or exchanges

In each case, we will comply with the requirements of the Privacy Act 1998 (Cth) and the APP's that apply to cross border disclosures of personal information.

Use of government related identifiers: We will not use a government related identifier of an individual (such as a Medicare number or driver's licence number) as our own identifier of individuals; or otherwise use or disclose such a government related identifier, unless this is permitted by the Privacy Act (for example, use of an identifier to verify an individual's identity or uses or disclosures required or authorised by or under an Australian law).

Data quality and security: We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files. We take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant; protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.
- You can help us keep your information up to date, by letting us know about any changes to your details, such as your address, email address or telephone number.

Security: The steps we take to secure the personal information we hold include website protection measures (such as firewalls and anti-virus software), security restrictions on access to our computer systems (such as login and password protection), controlled access to our corporate premises, policies on document storage and security, personnel security (including restricting access to personal information on our systems to staff).

Website security: While we strive to protect the personal information and privacy of users of our websites, we cannot guarantee the

security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact the Business Manager by telephone or post (details at the end of this Policy).

If you are a registered user of our websites, you can also help to protect the privacy of your personal information by maintaining the confidentiality of your username and password and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

Third party websites: Links to third party websites that are not operated or controlled by TKIS. We are not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

Access and Correction: Please contact our Business Manager (details below) if you would like to access or correct the personal information that we hold about you. We may ask you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

Complaints

If you have a complaint about how we have collected or handled your personal information, please contact our Business Manager (details below). Our Business Manager will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter in a timely manner.

TKIS also offers CareMonkey which allows parents and guardians to access self-service online forms. This allows you to self-submit and track your online complaint. Please also see our Complaint Management Policy.

External Appeals Process: If the complaints procedure does not find in favour of the student or the student is dissatisfied with the result of the complaints procedure, he/she will be informed of the external complaints and appeals process available to them.

The external authority used for the School's external complaints and appeals processes are:

Victorian Registration and Qualifications Authority

Level 4, Casselden 2 Lonsdale Street Melbourne Vic 3000
 (Postal Address: GPO Box 2317, Melbourne Vic 3001)
 Phone: +61 3 9637 2806
 Email: vrqa@edumail.vic.gov.au

Overseas Students Ombudsman

GPO Box 442 Canberra ACT 2601
 Phone: 1300 362 072 (within Australia) or + 61 2 6276 0111 (outside Australia)
 Fax: 02 6276 0123 (within Australia) or + 61 2 6276 0123 (outside Australia)
 Email ombudsman@ombudsman.gov.au Website: <http://www.oso.gov.au/>
 Translating and Interpreting Service: 131 450 (within Australia) or + 61 3 9203 4027 (outside Australia).

Our contact details

Please contact us if you have any queries about the personal information TKIS holds or the way we handle your personal information.

Mail: The Kilmore International School Attention: Business Manager
 40 White Street KILMORE 3764 AUSTRALIA

Email: admin@TKIS.vic.edu.au or Telephone: +61 3 5782 2211

Further general information about privacy is available on the website of the Office of the Australian Information Commissioner or by calling the OAIC's enquiry line at 1300 363 992.

Changes to this Policy

This Policy will be regularly reviewed and updated to take account of new laws and technology, changes to TKIS's operations and practices, and to ensure the Policy is appropriate for the changing TKIS environment. The current version will be posted on our website in a PDF format.

Policy Last Updated =24th April 2019
 Policy Next Review = September 2019