



## SJC PRIVACY POLICY

### 1. Name of policy

This is the *St John's College Privacy Policy*.

### 2. Commencement

This policy commences on 1 February 2017.

### 3. Statement of intent

- 3.1 St John's College collects personal information in the course of carrying on its business as an independent residential college within the University of Sydney.
- 3.2 The College respects the privacy of personal information and observes the *Australian Privacy Principles* contained in the *Privacy Act 1988* (Cth).

### 4. What is personal information?

**Personal information** is any information, including opinions, about an identified or identifiable individual, whether true or not, or recorded in a material form or not.

### 5. What kind of personal information does the College collect?

- 5.1 The College collects personal information, including sensitive information, for the purposes of its core business of providing educational and academic programs and residential accommodation for its resident and affiliate students.
- 5.2 The information collected may be about:
- current students or applicants;
  - the parents or guardians of current students and applicants;
  - other residents of the College;
  - staff members and job applicants;
  - alumni;
  - donors; or volunteers;
  - consultants or contractors;
  - other people who come into contact with the College.
- 5.3 The personal information collected about a person may include but may not be limited to: name, contact details, date of birth, nationality, gender, medical information, dietary requirements, occupation, qualifications, relationship to students or residents, enrolment and academic results, IT network usage, misconduct and discipline.

### 6. How is personal information collected?

- 6.1 Personal information is collected in digital form, on paper, and in photographs, film and video recordings.

- 6.2 Information is collected -
- from application forms (for example, for entry to College and for scholarships);
  - when interviewing or meeting with students or residents or prospective students or residents and their parents and guardians;
  - when receiving payments or donations;
  - when receiving course enrolment information and academic results from the University of Sydney and other institutions;
  - from question or survey forms administered to students;
  - from enrolment or subscription forms for student, parent or alumni programs or events;
  - from correspondence;
  - when receiving applications or bookings for conferencing, accommodation and external events;
  - when photographing or recording student or alumni events held within College or in which students or alumni participate outside of College.
- 6.3 Personal information is collected by College staff during the day-to-day administration of the College and attendance of students in the College. Personal information is also collected by automated systems within the College's IT network resources
- 6.4 The College may seek to collect and update personal information via email or the internet, by telephone, by mail or in person.

## 7. Use and disclosure of personal information

- 7.1 The College collects, holds, uses and discloses personal information for the following purposes:
- governance, administration and management of the College;
  - employment and management of staff;
  - admission and readmission of students;
  - providing network resources including internet access and wifi for students, residents and staff;
  - invoicing and collecting fees and charges;
  - pastoral care of students;
  - health and welfare of students, residents and staff;
  - providing academic programs and monitoring academic performance of students;
  - awarding and administration of scholarships, bursaries and prizes;
  - supporting student activities including social, cultural and sporting activities;
  - facilitating the management of sporting and cultural competitions;
  - managing student conduct issues and disciplinary processes;
  - soliciting and receiving donations;
  - organising student, alumni and other College events;
  - managing relationships with alumni and alumni associations;
  - maintaining an electoral roll and conducting elections for members of College Council;
  - marketing and promotions;
  - publishing magazines, newsletters, websites, and social media posts;
  - permitted general or health situations under the *Privacy Act*.
- 7.2 Personal information about individuals is authorised to be used for the purposes for which it was collected.
- 7.3 Where carrying out the above purposes reasonably requires disclosure of personal information to another party, disclosure will only be made on a confidential basis and subject to the application of the *Australian Privacy Principles* to that party, if it is reasonable and practical to do so.
- 7.3 Personal information about an individual may be disclosed:
- if disclosure is required by law; or

- to law enforcement authorities for the purpose of investigating or prosecuting criminal or other unlawful acts; or
- as authorised by a *Student Contract*; or
- in accordance with provisions of the *General Regulation* or other published College rules or policies; or
- in accordance with the *Joint Investigation Protocol* agreed between the University of Sydney and its residential colleges; or
- in the course of collecting outstanding debts.

## 8. Security of personal information

- 8.1 The College stores personal information under the control of the Rector and authorised staff:
- electronically in onsite data storage media;
  - electronically in cloud-based offsite storage;
  - in paper-based files kept onsite or archived offsite.
- 8.2 The College has implemented measures to ensure protection of personal information from misuse, loss, unauthorised access and modification, or improper disclosure.
- 8.3 Except as otherwise provided in this Policy, the College does not grant access to personal information to outside parties unless legally required to do so.
- 8.4 The College takes reasonable steps to destroy or de-identify information that is no longer required for use, after any period of time for which the College is legally required to retain the information.

## 9. Access to your personal information

- 9.1 You may apply for access to the personal information about you held by the College and you may inform the College of any information held which you believe is not correct.
- 9.2 If your personal details change, such as your mailing or email addresses, or telephone number, please contact the College to update your details online through the website or by sending us an email or letter. When we become aware that your details have changed we will update them.
- 9.3 To access personal information the College holds about you, please contact the Director, Corporate Services, who is the College's Privacy Officer, at [secretary@stjohnscollege.edu.au](mailto:secretary@stjohnscollege.edu.au).

## 10. Sending information overseas

- 10.1 The College may send personal information about an individual to overseas recipients. This is most likely to occur when providing information about students or alumni who have applied for positions or scholarships at overseas institutions or employers, or to facilitate exchanges with overseas educational institutions.
- 10.2 The College may also send personal information overseas when storing it with cloud service providers situated outside Australia.
- 10.3 The College will not disclose personal information to an overseas recipient without:
- taking reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to that information; or
  - obtaining the individual's consent to the disclosure (in which case (a) will not apply).

## 11. Information Technology

- 11.1 The College's website may use Cookies. Cookies are data that a website transfers to a computer's hard drive for record-keeping purposes. Cookies can facilitate your ongoing access

to and use of a site by remembering information about you at a later time. If you do not want information collected through the use of Cookies, you can disable the Cookie function in your browser. You should note that Cookies may be necessary to provide you with some features on the College website.

- 11.2 The College website may contain links to other sites. The College is not responsible for the privacy practices or the content of other sites.
- 11.3 Information about yourself that you disclose by posting it on bulletin boards, chat rooms or social media and similar digital media platforms may become public information. If you disclose your personal information, or that of other residents and staff, while resident in College, the College cannot protect that personal information.
- 11.4 The College encourages all residents and staff to respect and protect the personal information of others. For more information, contact the College Privacy Officer at [secretary@stjohnscollege.edu.au](mailto:secretary@stjohnscollege.edu.au).

## **12. Questions or complaints**

- 12.1 If you have a question about the application of our Privacy Policy, please contact College Privacy Officer at [secretary@stjohnscollege.edu.au](mailto:secretary@stjohnscollege.edu.au).
- 12.2 If you have a complaint about the collection, use or destruction of your personal information, your complaint should be directed in the first instance to the College Privacy Officer at [secretary@stjohnscollege.edu.au](mailto:secretary@stjohnscollege.edu.au). We will investigate your complaint and attempt to resolve any breach of the *Australian Privacy Principles* that might have occurred in accordance with the *Privacy Act*.
- 12.3 If you are not satisfied with the outcome of this procedure, then you may request that an independent person (usually the Office of the Australian Information Commissioner) investigate your complaint.