

Policy name	Privacy
Date last reviewed	July 2020
Scheduled review date	July 2022
Approved by	Board

Objective

This Privacy Policy aims to explain how and why personal information is collected, how it is used, and what controls individuals have over how this information is used. Skyline Education Foundation Australia is committed to protecting and safeguarding the privacy, confidentiality and security of personal information and the need to comply with the Commonwealth Privacy Act and the 10 National Privacy Principles which set out the way in which organisations must deal with personal information.

Scope

This Policy applies to all employees, Board and Committee members, contractors, volunteers, students, families, donors and other stakeholders.

Policy Statement

The objective of this Policy is to ensure the following key principles are reflected in Skyline's management practices:

Collection of Information

Some information provided by students, families, customers, contractors and other third parties might be considered private or personal. Without these details we would not be able to carry on our business and provide services to students. We will only collect such personal information if it is necessary for delivery of our services.

Skyline Education Foundation Australia collects information in a number of ways from individual persons in different situations. In particular, personal information is collected from people in the following situations by Skyline:

- Students, prospective students, graduates and families or custodians who complete paper based or online applications or registrations of interest through the Skyline Education Foundation Australia website or application forms and are required to provide some personal information and banking and contact details
- Partners or donors are required to provide contact and bank account details
- Suppliers of goods and services to Skyline Education Foundation Australia are required to provide contact and bank account details
- Prospective employees of Skyline Education Foundation Australia provide personal information for the purposes of obtaining employment within Skyline
- If you contact Skyline Education Foundation Australia either by telephone, social media, mail or email, we may keep a record of that correspondence and may use this as required.

At or before the time the personal information is collected by us we will take reasonable steps to ensure that you are made aware that we are collecting personal information, the purpose for collecting this information, the type(s) of organisations (if any) to which we usually disclose this information, the legislation governing the collection and use of this information and your right to access this information.

We will take reasonable steps to make sure that the personal information collected, used or disclosed is accurate, complete and up-to-date.

Use of Information Collected and Disclosure of Personal Information to Others

We may use or disclose personal information held about an individual for the primary purpose for which it is collected, such as to keep students and stakeholders informed about the ongoing activities of the organisation and to assist us in improving our services or in assessing applications for our program and organisational improvement.

Information provided by you may be used by Skyline in the following ways:

- To maintain your individual student or donor record and a comprehensive database
- To provide information to you to enable you to access the services and benefits available to you as a Skyline stakeholder
- To provide you information about stakeholders that are associated with but not part of Skyline
- To conduct research in order to identify and analyse the ongoing needs of Skyline students and their families, and to identify future potential students, services and benefits

Information provided to Skyline may be disclosed to the following bodies:

- Program providers, collaborators, researchers and evaluators
- Appointed and authorised representatives of Skyline Education Foundation Australia

We may also use such information for a purpose related to the primary purpose of collection and where it would reasonably be expected by you that we would use the information in such a way.

This information is only disclosed to persons outside our business in the circumstances set out in this policy or as otherwise notified to you at the time of collection of the information.

We are permitted to use or disclose personal information held about you:

- Where you have consented to the use or disclosure
- Where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety
- Where we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities
- Where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process) or required to inform
- Where we reasonably believe that the use or disclosure is reasonably necessary for prevention, investigation, prosecution and punishment of crime or wrongdoings before any court, tribunal or enforcement body

We will not use or disclose personal information about an individual for a purpose (the secondary purpose) other than the primary purpose of collection unless the secondary purpose is related to the primary purpose of collection and the individual would reasonable expect the organisation to use or disclose the information for the secondary purpose or the individual has consented to the use or disclosure.

We will not use personal identification numbers that have been assigned to an individual by a governmental department or agency.

Unless specified herein we will not pass any of your personal information to any third party, other than agents of Skyline Education Foundation Australia, without the consent of the individual.

Your personal contact information will never be given, sold, or otherwise shared by Skyline Education Foundation Australia with third parties for advertising or marketing purposes.

Links

Our web site may contain links to other web sites and those third-party web sites may collect personal information about you. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. Skyline Education Foundation Australia encourages users to be aware when they leave the site and to read the privacy statements of each and every website that collects personally identifiable information.

Security and Storage

Skyline Education Foundation Australia places a great importance on the security of all information associated with our students and stakeholders. We have implemented technology safeguards, security policies and other measures to protect data under our control from unauthorised access, improper use, alteration, unlawful or accidental destruction or accidental loss. We also protect your information by requiring that all our employees and others who have access to or are associated with the processing of your data to respect your confidentiality.

Skyline Education Foundation Australia retains the information you provide to us including your contact and bank account details to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities.

Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.

You should keep in mind that whenever you voluntarily disclose personal information online, for example, through email, that information may in some circumstances be collected and used by others. If you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

Access to and Correction of Personal Information

Skyline Education Foundation Australia is committed to maintaining accurate, timely, relevant and appropriate information about our students and stakeholders.

So long as your request for your personal information is in accordance with the National Privacy Principles, then we will give you access to that information.

Inaccurate information will be corrected upon receiving advice to this effect from you once your identity has been confirmed. To ensure confidentiality, details of your personal information will be passed on to you only if we are satisfied that the information relates to you.

If we refuse to provide you with access or correct the personal information held about you then we will provide reasons for such refusal.

Complaints

Further Information

If you have a complaint about our Privacy Policy or the collection, use or safe disposal destruction of your personal information, your complaint should be directed in the first instance to the Chief Executive Officer, Skyline Education Foundation Australia.

We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of personal information held by us about you in accordance with the Commonwealth Privacy legislation. If you are not satisfied with the outcome of this procedure then you may request that an independent person (usually the Commonwealth Privacy Officer) investigate your complaint.

Please contact the Skyline Education Foundation Australia should you require further information regarding our Privacy Policy.

Should you wish to read more information on privacy legislation or the National Privacy Principles we recommend that you visit the Office of the Australian Information Commissioner website at www.privacy.gov.au

Responsibilities

Board: Establishing strategic directions consistent with Skyline's stated mission, vision and values, maintaining an effective system of internal control, and monitoring compliance with legal and ethical requirements.

Management: Accountability and responsibility for ensuring implementation and compliance with this Policy and all associated internal control procedures supporting this Policy. Responsibility for developing, maintaining and updating procedures which enable compliance with this Policy.

Review

This Policy will be reviewed every two (2) years or earlier as required in the event of significant legislative changes or changes in business operations.

Procedures

The Privacy Policy will be held on the Skyline Education Foundation Australia website and specific procedures relating to Privacy will be readily accessible in Skyline's files.