

## ISCA Privacy Policy

*Note: This policy is subject to change from time to time. Please check all ISCA Policies on a regular basis for updates.*

Reviewed July 2021

International Student Care Australia (**ISCA**) is committed to protecting the privacy of its employees, homestay students and homestay hosts and their family.

ISCA is bound by the *Australian Privacy Principles (APPs)* and the *Privacy Act 1988 (Cth) (the Act)*.

### Scope

This policy applies to homestay students, homestay hosts and their family, employees and volunteers. This policy outlines how the ISCA collects, uses and discloses personal information.

### Definitions

**Employee** means all employees employed by ISCA, including applicants and prospective applicants.

**Employee Record** means a record as defined in the Act.

**Homestay host** is the prospective, current or past carer of a homestay student.

**Homestay student** means prospective, current or past homestay student of ISCA.

**School** means the educational institution where a Homestay student attends.

**Personal information** is information or an opinion, whether true or not, and whether recorded in material form or not, about an identified individual or an individual whose identity is reasonably apparent, or can be determined, from the relevant information or opinion.

**Sensitive information** is a type of personal information. It includes information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preference or practice, or criminal record. Sensitive information also includes biometric information that is used for the purpose of automated biometric verification, biometric identification or biometric templates.

**Health information** is a subset of sensitive information. It is information or an opinion about the health or disability of an individual and information collected to provide, or in providing a health service.

**Health service** includes an activity performed to assess, record, maintain or improve an individual's health, to diagnose an illness or disability, to treat an individual, or the dispensing on prescription of a drug or medicinal preparation by a pharmacist.

### Purpose

ISCA collects, holds, uses and discloses personal information so that it can exercise its function and activities and fulfil relevant duties and obligations, which may include (but are not limited to):

- a) assessing eligibility and monitoring compliance with contractual obligations;
- b) providing those involved in homestay with ISCA's services;
- c) supporting a Homestay student's educational, social and medical wellbeing;
- d) ISCA administrative purposes, including facilitating matters in relation to payments and complaints;
- e) informing (including by direct marketing) about ISCA's services and the goods and/or services of third parties available in connection with our services;

- f) creating and updating ISCA's database(s);
- g) ensuring compliance with our contractual and other legal obligations;
- h) monitoring use of the Website for customer service purposes; and
- i) any other act we are required or authorised to do by law,

ISCA collects and holds personal information, sensitive information and health information about Homestay students, Homestay hosts and their families and Employees.

ISCA generally deals with personal and sensitive information regarding:

- a) Homestay students and Homestay hosts relating to the enrolment in the ISCA Homestay program;
- b) job applicants, staff members, volunteers and contractors; and
- c) persons who are involved with ISCA.

ISCA collects personal information about individuals to satisfy legal obligations and to fulfil its purpose as a homestay provider. If ISCA requests information to be provided and the request is not complied with, ISCA may be unable to enrol a prospective Homestay student or Homestay host or continue enrolment of a current Homestay student or Homestay host in ISCA's homestay program.

## Collection

### Personal Information

ISCA collects personal information about an individual by way of forms, face to face meetings, interviews and telephone calls. Other individuals may provide personal information about a person in dealings with ISCA.

ISCA may collect personal information about an individual from a third party, for example, an Agent providing a report. Collection of personal information from a third party will be undertaken where it is reasonably necessary to do so. Any personal information that is unsolicited will be dealt with in accordance with the APPs.

### Sensitive Information

Sensitive information will be collected by ISCA where it is reasonably necessary for one or more of ISCA's functions or activities. It will only be collected with consent, unless one of the exceptions under the APPs applies.

### Employee Records

Under the Act, the APPs do not apply to Employee records. This means that the Act does not apply to how ISCA deals with an Employee record that concerns current and former Employees of ISCA.

## Use and Disclosure

ISCA will only use and disclose personal information for the primary purpose of collection or as otherwise specified in this Privacy Policy.

ISCA may disclose personal information to a School for administrative and management purposes including insurance, child protection and professional standards.

Personal information will only be used for a secondary purpose if consent has been obtained, where it is reasonably expected or if such use or disclosure falls within a permitted exception.

Sensitive information will be used and disclosed for the primary purpose of collection, unless ISCA is advised otherwise, or the use or disclosure is required / permitted by law.

## Quality of Information and Security

ISCA endeavours to ensure that the personal information it holds is accurate, complete and up to date. ISCA will take all reasonable steps to:

- a) protect personal information from misuse, interference, loss, unauthorised access, modification or unauthorised disclosure; and
- b) destroy or de-identify information that is no longer needed.

## Access to Personal Information

Access to records of personal information that ISCA holds or concerns about the accuracy of information held by ISCA should be directed to the Director of ISCA.

Under the Act, an individual has the right to obtain access to personal information which ISCA holds about them; there are exceptions to this, for example, where access may impact the privacy of others or pose as a threat to the individual.

To make a request to access personal information ISCA requires a request in writing. ISCA will respond to this request within a reasonable period of time (14 days). Where it is reasonable, ISCA will provide access in the manner requested.

If a request for access is refused ISCA will provide written reasons on why the request was refused

## Overseas Disclosure and Cloud

ISCA may disclose personal information about an individual overseas; this is likely to occur if ISCA uses “cloud” service providers. When disclosing personal information ISCA will take all steps reasonable to ensure that the overseas recipient complies with the APPs.

## Marketing

ISCA engages in marketing as a means to promote future growth and sustain and improve the homestay program for Homestay students. Personal information collected may be used to make a marketing appeal.

ISCA will abide by any direction from an individual not to disclose personal information to third parties for marketing purposes.

## Complaints

If an individual believes that ISCA has breached the APPs a complaint can be made to ISCA. All complaints should be in writing and directed to the Director. ISCA will investigate complaints in a timely manner and respond in writing.

If an individual is not satisfied with ISCA’s response, a complaint can be lodged with the Office of the Australian Information Commissioner on the following website <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.