



A Co-educational Christian Day and Boarding School

Privacy Policy

This Privacy Policy sets out how the School manages personal information provided to or collected by it. The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. In relation to health records, the School is also bound by the New South Wales Health Privacy Principles which are contained in the *Health Records and Information Privacy Act 2002* (Health Records Act). The School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the School's operations and practices and to make sure it remains appropriate to the changing School environment.

What kinds of personal information does the School collect and how does the School collect it?

The type of information the School collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents and/or guardians ('parents') before, during and after the course of a pupil's enrolment at the School;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the School.

Personal Information you provide: The School will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents and students provide personal information.

Personal Information provided by other people: In some circumstances the School may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another School.

Exception in relation to employee records: Under the Privacy Act and ***Health Records and Information Privacy Act 2002 (NSW)***, the Australian Privacy Principles [and Health Privacy Principles] do not apply to an employee record. As a result, this Privacy Policy does not apply to the School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and employee.

How will the School use the personal information you provide?

The School will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

Students and Parents: In relation to personal information of students and parents, the School's primary purpose of collection is to enable the School to provide schooling for the pupil. This includes satisfying the needs of parents, the needs of the pupil and the needs of the School throughout the whole period the pupil is enrolled at the School. The purposes for which the School uses personal information of students and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of the School;
- looking after students' educational, social and medical wellbeing;
- seeking donations and marketing for the School; and
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

In some cases where the School requests personal information about a pupil or Parent, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity.

Job applicants, staff members and contractors: In relation to personal information of job applicants, staff members and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the School uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the School; and
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

Volunteers: The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as [alumni associations], to enable the School and the volunteers to work together.

Marketing and fundraising: The School treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising, for example, the School's Foundation or alumni organisation [or, on occasions, external fundraising organisations].

parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

Who might the School disclose personal information to and store your information with?

The School may disclose personal information, including sensitive information, held about an individual to:

- another school;
- government departments;
- medical practitioners;
- people providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- recipients of School publications, such as newsletters and magazines;
- parents;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

Sending and storing information overseas: The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a School exchange. However, the School will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The School may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia. **

How does the School treat sensitive information?

In referring to 'sensitive information', the School means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The School's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

The School has in place steps to protect the personal information the School holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

Access and correction of personal information

Under the Commonwealth Privacy Act [and the Health Records Act], an individual has the right to obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or update any personal information the School holds about you or your child, please contact the School Principal in writing. The School may require you to verify your identity and specify what information you require. The School may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the School will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

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 requests for consent and notices in relation to the personal information of a pupil to the pupil's parents. The School will treat consent given by parents as consent given on behalf of the pupil, and notice to parents will act as notice given to the pupil.

As mentioned above, parents may seek access to personal information held by the School about them or their child by contacting the School Principal. 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 pupil.

The School may, at its discretion, on the request of a pupil grant that pupil access to information held by the School about them, or allow a pupil to give or withhold consent to the use of their personal information, independently of their parents. This would normally be done only when the maturity of the pupil and/or the pupil's personal circumstances so warranted.

Enquiries and complaints

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles please contact the School Principal. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

**if applicable

This document was reviewed in Term 1, 2015 and it will be reviewed no later than Term 1, 2020.

ENDORSEMENT

 20.5.15 Mr Andrew Kotzur (Chair Board of Management)

 20.5.15 Pastor Mark Doecke (College Principal)

Addendum A – To be reviewed regularly

St Paul's College Privacy Compliance Analysis

a) **What information does the College collect about whom and from whom; why and how the College collects, uses and discloses personal information:**

- Information is collected regarding families, children, partners, next of kin – all information related to the enrolment form. The college collects this information from parents when they bring their child for interview. This information is necessary for our database; for reporting requirements to the government. Such information is never disseminated to anyone outside of the College – except in the case of any outstanding fees where the matter is required to go to the debt collector. The enrolment form explains such incidences. The enrolment form also states that the College Board has the right to change anything at any time without notice.

There is a media consent portion on the form; a consent section to details being made available to the executives of the College Parents and Friends Association, and St Paul's Old Collegians' Association for the purpose of newsletters and activities.

Student files are kept in locked filing cabinets. The Enrolments and Marketing Manager keeps ongoing files which she is working on locked in her office until the files are ready to be filed with the other student files.

- The College collects personal information from staff members. Staff files are kept in locked filing cabinets, which are accessible to only the Principal, Principal's PA, Payroll Officer and Business Manager. Staff personal information is not disclosed to anyone. Staff individual phone numbers are available to other staff members. This information is not shared outside the school unless permission is given by the staff member.
Past student and staff files are sent to the Archives Room which is kept locked at all times.

b) **Any risk areas (eg. where there is collection and use of sensitive information or where collection, use or disclosure of personal information might not be expected by the individual):**

- No personal information of any individual is disclosed to any third party without prior permission.

February 2015

Addendum B

WHAT SCHOOLS NEED TO DO TO COMPLY

How to comply with the Privacy Act

The School should consider using the following action plan in taking steps to comply with the Privacy Act:

6.1.1 Internal review:

- (a) consider appointing a privacy officer or other person who will be responsible for privacy related issues; and
- (b) conduct a review of current information handling practices and security procedures.

6.1.2 Analyse results of review to identify:

- (a) what information the School collects about whom and from whom;
- (b) why and how the School collects, uses and discloses personal information;
- (c) any risk areas (eg. where there is collection and use of sensitive information or where collection, use or disclosure of personal information might not be expected by the individual); and
- (d) what changes need to be made to comply with the APPs and reduce privacy risks.

6.1.3 Privacy documentation:

- (a) review and amend existing Privacy Policy or implement a Privacy Policy (this may be adapted from the draft policy in Annexure 2). The Privacy Policy must be clearly expressed and up-to-date and detail the School's management of personal information; and
- (b) review any other relevant documentation (such as 'standard collection statements' and other forms) as necessary.

6.1.4 Ensure practices, procedures and systems are in place that:

- (a) will ensure the School complies with the APPs, including identifying and managing privacy risks and compliance issues; and
- (b) will enable the School to deal with inquiries or complaints from individuals about its compliance with the APPs.

6.1.5 Continuing obligations:

- (a) make the Privacy Policy available to anyone who asks for it;
- (b) ensure on-going compliance (eg. regular review of information handling practices, conduct further audits where necessary, update Privacy Policy and collection notices); and
- (c) ensure compliance with other applicable legislation, including health records legislation (see Section 22).

