



THE SCHOOL USES THE PRIVACY POLICY OF THE ANGLICAN SCHOOLS COMMISSION

PRIVACY POLICY

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1. YOUR PRIVACY IS IMPORTANT

This statement outlines the John Wollaston Anglican Community School's policy on how the School uses and manages personal information provided to or collected by it. John Wollaston Anglican Community School is bound by the Australian Privacy Principles contained in the *Commonwealth Privacy Act (1988)*. John Wollaston Anglican Community School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to schools' operations and practices and to make sure it remains appropriate to the changing school environment.

2. WHAT KIND OF PERSONAL INFORMATION DOES JOHN WOLLASTON ANGLICAN COMMUNITY SCHOOL COLLECT AND HOW DOES THE SCHOOL COLLECT IT?

The School has a responsibility to:

- use and manage personal and sensitive information collected by it in accordance with the Privacy Act.
- inform individuals of the purpose of collecting personal and sensitive information.

This policy covers personal information about individuals who come into the school community including staff, students and contractors.

John Wollaston Anglican Community School will collect personal information on individuals for a variety of primary purposes. On occasion, the School will also need to use this same personal information for secondary purposes that less directly relate to the primary purpose for which the information was collected. This will only occur in ways that the individual might reasonably expect or in ways to which consent has been implied or given.

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

- pupils 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, including the School Council or committee members, and participants in school activities, particularly professional development; and
- other people who come into contact with the School.

2.1 Personal Information you provide

The School will generally collect personal information held about an individual by way of completed forms. However, given the nature of our operations, we also receive personal

information by emails, letters, face-to-face meetings and interviews, telephone calls, individual photographs for retention on the database, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring. Personal information will be provided by parents, pupils, staff members, job applicants, volunteers, contractors, and all others coming into contact with the School. The person collecting the information is expected to ensure that the person supplying the information is aware of the purpose(s) for which the information is being collected.

2.2 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, or a recommendation for School Council or committee membership. The person collecting the information is expected to ensure that the person supplying the information is aware of the purpose(s) for which the information is being collected.

2.3 Exception in relation to employee records

The Privacy Act does not apply to employee records. As a result, this Privacy Policy does not apply, in relation 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. Past and present employees of the School cannot automatically access the personal information held about them by the School.

3. HOW WILL JOHN WOLLASTON ANGLICAN COMMUNITY 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, or to which you have consented. At the time of collecting personal information, the School will make it clear to the individual as to the intended uses of the information.

3.1 Pupils and Parents

In relation to personal information of pupils 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 pupils and Parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after pupils' educational, social, spiritual 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 obtained, 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.

3.2 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 funds and marketing for the School; and
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

In relation to unsuccessful job applicants, permission will be sought to hold the information for any extended period of time, otherwise it will be destroyed after a period of no more than 60 days.

3.3 Volunteers

The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as the Old Wollastonians' Association, School Council or committee members to enable the School and the volunteers to work together.

The purposes for which personal information of volunteers is used include:

- to keep volunteers informed of matters relating to school activities of relevance for the volunteer to fulfil their obligation;
- for insurance purposes;
- seeking funds and marketing for the School; and
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

3.4 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 be a quality learning environment in which both pupils and staff thrive. Personal information held by the School may be disclosed to an organisation that assists in the School's fundraising, for example, the School's Foundation or Old Wollastonians' Association. 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. Sensitive information will not be used for this purpose without the consent of the individual.

4. TO WHOM MIGHT JOHN WOLLASTON ANGLICAN COMMUNITY SCHOOL DISCLOSE PERSONAL INFORMATION?

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

- the Anglican Schools Commission;
- the School's local parish;
- another school;
- government departments;
- medical practitioners;
- people providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- recipients of School publications, like newsletters and magazines;

- parents;
- anyone to whom the School has been authorised by you to disclose information; and
- anyone to whom we are required to disclose the information by law.

4.1 Sending information overseas

The School may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers situated outside Australia or to facilitate a school exchange.

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);
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation;
- we form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- we are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

5. HOW DOES JOHN WOLLASTON ANGLICAN COMMUNITY SCHOOL TREAT SENSITIVE INFORMATION?

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.

6. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

John Wollaston Anglican Community School's staff and individuals who serve on the School Council or committees conducting the business of the School are required to respect the confidentiality of personal information and the privacy of individuals. The School stores personal information in a variety of formats including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices. The School has procedures in place steps to protect the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password protected access rights to computerised records.

The School will only identify information about an individual by their name or, if appropriate, an identifier of its own creation.

7. UPDATING PERSONAL INFORMATION

John Wollaston Anglican Community School endeavours to ensure that the personal information it holds is accurate, complete and current. A person may seek to update their personal information held by the School by contacting the Administration of the School at any time. The Australian Privacy Principles require the School not to store personal information longer than necessary.

8. YOU HAVE THE RIGHT TO CHECK WHAT PERSONAL INFORMATION JOHN WOLLASTON ANGLICAN COMMUNITY SCHOOL HOLDS ABOUT YOU

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal

information which John Wollaston Anglican Community School holds about them and to advise the School of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Pupils will generally have access to their personal information through their parents, but older pupils may seek access and corrections themselves. To make a request to access any information the School holds about you or your child, please contact the 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 the School cannot provide you with access to that information, a written notice explaining the reasons for refusal will be provided.

9. CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF PUPILS

John Wollaston Anglican Community 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. Parents may seek access to personal information held by John Wollaston Anglican Community School about them or their child by contacting the 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. John Wollaston Anglican Community 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 pupil involved had reached 18 years of age, but the School could do so in other circumstances when the maturity of the pupil and/or the pupil's personal circumstances so warranted.

10. ENQUIRIES AND COMPLAINTS

If you would like further information about the way John Wollaston Anglican Community School implements this policy and manages the personal information it holds, please contact the Principal. If you believe that the School has breached the Australian Privacy Principles, you may contact the Principal to register a complaint. The Principal will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.

11. REVIEW

The School will review all relevant documentation, including standard collection statements and all other forms, as necessary.

12. DEFINITIONS

12.1 Personal Information

Personal information is information or an opinion that allows someone to identify the individual that the information or opinion is about. It can range from very detailed information such as medical records to other less obvious types of identifying information such as an email address. Personal information includes name, address and other contact

details; date of birth; next of kin details; financial information; photographic images and attendance records.

12.2 Sensitive Information

Sensitive information is a type of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, government identifiers, nationality, country of birth, languages spoken at home, family court orders, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, or criminal record. It also includes health information. 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, of the use or disclosure of the sensitive information is allowed by law.

12.3 Health Information

Health information is a subset of sensitive information. It is any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided, currently or in the future, to an individual that is also personal information. Health information also includes personal information collected in the course of providing a health service. Health information (particularly in relation to student and parent records) includes medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.

12.4 Record

The Privacy Act regulates personal information contained in a 'record'. A 'record' is defined as a 'document' or an 'electronic or other device'. A 'document' includes anything on which there is writing, anything from which sounds, images or writings can be reproduced, drawings or photographs. Some items are excluded from this definition, including a generally available publication (e.g. a telephone directory), and anything kept in a library, art gallery or museum for the purposes of reference, study or exhibition.

12.5 Primary Information/Purpose

When an individual provides, and the School collects, personal information, the primary purpose of collection will be determined by the context in which the individual gave the information to the School, for example, to enrol a pupil or to apply for a job. This is the primary purpose of collection even if the organisation has some additional purposes in mind.

12.6 Secondary Information

The School may use or disclose personal information for a secondary purpose if it has the individual's consent. Consent to the use or disclosure can be expressed or implied. Implied consent arises where consent may reasonably be inferred in the circumstances from the conduct of the individual and the school. If the School's use or disclosure has serious consequences for the individual, the School would have to be able to show that the individual could have been expected to understand what was going to happen to

information about them and gave their consent. In these circumstances, the School should seek express consent.

Examples of Secondary Information - Send newsletters, magazines, mail-outs and correspondence.

RELEVANT LEGISLATION PERTAINING TO THIS POLICY

The Commonwealth Privacy Act (1988)

Privacy Amendment (Private Sector) Act 2000.