



Privacy Policy

Overview

The Anglican School Googong (the School) is required to collect sufficient information about students, staff and others with a role within the School, to ensure their safety and wellbeing and to allow the operation of the School. The School understands its responsibility to manage and use this information judiciously and with confidentiality.

This Policy outlines the School's approach to using and managing personal information in its possession. The School is bound by the National Privacy Principles contained in the Privacy Act and implements policies and systems to ensure the safe keeping of personal information. This Policy provides direction to staff as to how to use personal information and the limitations in sharing this information.

Objective

This Policy provides direction for the appropriate and secure management of personal information provided to or collected by the School.

Procedure for Implementing the Privacy Policy

Information Collected

The School collects information only as required to perform its functions and fulfil its legal obligations, including those of duty of care. Such information is always collected and managed in accordance with relevant privacy legislation.

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

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

Personal Information

The School will generally collect personal information about an individual using forms completed by parents or students, or through face-to-face meetings and interviews, and telephone calls.

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 previous school reports.

Under the Privacy Act, the National 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.

The School uses personal information it collects for the primary purpose for which it is obtained. It may also use it for secondary purposes that are related to the primary purpose and may be reasonably expected, or for which consent has been given.

Students and Parents

In relation to personal information of students and parents, the School's primary purpose of collection is to enable it to provide schooling for the student. This includes satisfying both the needs of parents and the needs of the student throughout the whole period the student is enrolled at the School.

The purposes for which personal information of students and parents is used include:

- day-to-day administration;
- satisfying the School's legal obligations and allowing it to discharge its duty of care;
- keeping parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- caring for students' educational, social, spiritual and medical wellbeing;
- assessing applications for financial assistance such as bursaries or fee reduction; and
- seeking donations and marketing for the School.

It is essential that the School has up to date information about students in its care. Where the School requests personal information about a student or parent, and that information is not provided, the School may not be able to enrol, or continue the enrolment, of the student.

If parents/guardians provide the School with the personal information of others, such as doctors or emergency contacts, the School encourages the parents/guardians to inform those individuals that they are disclosing that information to the School. The individuals should be informed that they can access that information if they wish and that the School does not usually disclose this information to third parties.

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.

The School complies with the Tax File Number Guidelines 2011 (TFN Guidelines) issued under s17 of the Privacy Act 1988 (Privacy Act) which regulate the collection, storage, use, disclosure, security and disposal of individuals' TFN information.

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

- administering the individual's employment or contract;
- insurance;
- seeking funds and marketing for the School;
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

Volunteers

The School obtains personal information about volunteers who assist the School. Information is collected to the extent required to enable the School and the volunteers to work together and to ensure the safety of students.

Marketing and fundraising and community building

The School treats community building and marketing, as an important part of ensuring that the School continues to be a quality learning environment.

Parents, staff, contractors and other members of the wider School community may from time to time receive information sent on behalf of the School. School publications, such as newsletters and magazines, which include personal information, may be used for marketing and community building purposes.

Disclosure of Personal Information

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

- parents;
- another school;
- government departments;
- medical practitioners;
- people providing services to the School, including specialist visiting teachers and sport coaches;
- recipients of School publications, such as newsletters and magazines; and
- anyone authorised by the relevant individual to receive this information.

Such information would only be shared where it is legal to do so and only if necessary for the School to fulfil its functions or its legal obligations, including those of duty of care. Where personal information is shared with a third party, only the

information that needs to be disclosed is shared, not necessarily all information relating to that person.

On occasion information and related photographs regarding academic and sporting achievements, student activities, excursions and events is published in newsletters, the annual magazine, prospectus, calendar and the School intranet. The School will seek annual permission from the student's parent/guardians for such publications.

The School will obtain separate permissions from the student's parents/guardian prior to publication if the School seeks to include photographs or other identifying material in promotional or advertising material for the School or otherwise make it available to the public.

Sending 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, unless it is directly to the parents/guardians of a student, 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.

Management of 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 agreed by the individual. Such information may otherwise be disclosed where allowed by law.

Management and security of personal information

The School and its staff respect the confidentiality of students' and parents' personal information and the privacy of individuals. Various School policies applicable to staff reiterate the need for confidentiality and care in the management of personal information and sanctions exist for breach of these rules.

The School has in place procedures to protect the personal information it holds from misuse, loss, unauthorised access, unauthorised modification or disclosure. A range of methods are used to secure this information including locked storage of paper records and security protected access rights to computerised records.

Personal information which is stored electronically is stored on servers within Australia with the exception of email and some data stored in Singapore in Microsoft's Office 365 hosted environment.

Updating personal information

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information by contacting the School. The National Privacy Principles require the School not to store personal information longer than necessary.

Consent and Rights of Access

The School respects every parent's right to make decisions concerning their child's education. Generally, the School will refer any requests from third parties for consent and notices in relation to the personal information of a student to the student's parents. The School will treat consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

The School is permitted under legislation to provide non-educational material to a parent where the student would reasonably expect this to happen. Under the Privacy Act, and in some circumstances, the School will consider the age of the student, the nature of the information, and the student's expectations about what information might be disclosed.

In some rare cases it may be that the School believes that the disclosure of sensitive information may not be in the best interests of a student. The Privacy Principals allow non-disclosure in such circumstances. In all such cases the Principal is to be involved in the decision as to whether such circumstances apply.

The School will provide school reports to non-custodial parents in most circumstances. However, there may be exceptions, such as where court protection orders against a parent are in operation and do not permit the School to provide reports to that parent.

Access

Under the Privacy Act, an individual has the right to obtain access to any personal information that the School holds about them, and to advise the School of any perceived inaccuracy. Students will generally have access to their personal information through their parents, but students over the age of 18 may seek access themselves.

In accordance with the exceptions set out in legislation, access to personal information may be denied in certain circumstances. Such occasions would include situations 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 student.

To access personal information that the School holds, an individual should contact the Principal in writing, including verification of identity and outline the specific information required.

The School may charge a fee to cover the cost of verifying the 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 is unable to provide access to the information sought, it will provide the applicant with written notice explaining the reasons for refusal.

Enquiries and complaints

Further information about the way the School manages the personal information it holds can be obtained from the office of the Principal.

Should any person wish to complain on the grounds that they believe that the School has breached the Australian Privacy Principles, he or she should contact the Principal. The School will investigate any complaint and notify the complainant of the decision in relation to the complaint as soon as is practicable after it has been made.

References

[Privacy Act 1988](#)

[National Privacy Principles 2014](#)

[Children and Young Persons \(Care and Protection\) Act 1998](#)

[Health Records and Information Privacy Act 2002](#)

[Child Protection \(Working with Children\) Act 2012](#)

[Child Protection \(Working with Children\) Regulation 2013](#)