

Privacy Policy

This statement outlines the St Paul's Grammar Schools' policy on how the St Paul's Grammar School uses and manages personal information provided to or collected by it. The St Paul's Grammar School is bound by the National Privacy Principles contained in the Commonwealth Privacy Act 1988 and Health Records and Information Privacy Act 2002. The St Paul's Grammar School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to St Paul's Grammar Schools' operations and practices and to make sure it remains appropriate to the changing St Paul's Grammar School environment.

What kind of personal information does the St Paul's Grammar School collect and how does the St Paul's Grammar School collect it?

The type of information the St Paul's Grammar School collects and holds includes (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 St Paul's Grammar School; job applicants, staff members, volunteers and contractors; and other people who come into contact with St Paul's Grammar School.

The types of personal information we collect about students and parents and/or guardians includes but is not limited to:

- name, contact details (including next of kin), date of birth, gender, language background,
- previous school attended and religion;
- parents' education, occupation and language background;
- medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
- results of assignments, tests and examinations;
- conduct and complaint records, or other behaviour notes, and school reports;
- information about referrals to government welfare agencies;
- counselling reports;
- health fund details and Medicare number;
- any court orders;
- volunteering information;
- photos, videos, other images or other identifying material associated with school activities; and
- private emails (when using the school's email address);

The types of personal information we collect about job applicants, employees, volunteers and contractors, includes but is not limited to:

- name, contact details (including next of kin), date of birth, and religion;
- information on job application;
- professional development history;
- salary and payment information, including superannuation details;
- medical information (e.g. details of disability and/or allergies, and medical certificates);
- complaint records and investigation reports;

- leave details;
- photos, videos, other images or other identifying material associated with school activities;
- workplace surveillance information;
- work emails and private emails (when using work email address), work data and private data (when using work electronic devices), and internet browsing history;
- and any other information relevant to the job applicant, employee, volunteer or contractor's role

The types of personal information we collect about other people who come into contact with the School, school includes but is not limited to:

- name and contact details and any other information necessary for the particular contact with the school.

Personal information you provide:

The St Paul's Grammar 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 telephone calls. On occasions people other than parents and students provide personal information.

Personal information provided by other people:

In some circumstances the St Paul's Grammar School may be provided with personal information about an individual from a third party, for example a report provided by a professional or a reference from another school.

Exception in relation to employee records:

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 St Paul's Grammar School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the St Paul's Grammar School and employee.

How will the St Paul's Grammar School use the personal information you provide?

The St Paul's Grammar 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.

The purposes for which the school may use personal information of students and parents include:

- to facilitate the provision of educational services to students enrolled at the school to assess enrolment applications.
- to keep parents informed about matters related to their student's schooling, through correspondence, newsletters and magazines, and the like;

- day-to-day administration;
- providing for students' educational, social, spiritual and medical wellbeing;
- to facilitate the transfer of a student to another school;
- 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 student or parent, if the information requested is not obtained, the school may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

Job applicants, employees and contractors: In relation to personal information of job applicants and contractors, the school's primary purpose for collection is to assess and (if successful) to engage the applicant or contractor, as the case may be. Subsequently, further personal information may be required from successful job applicants for them to be employed as employees or contractors.

The purposes for which the school may use personal information of job applicants, employees and contractors include:

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

Volunteers: The school obtains personal information about volunteers who assist the school in its functions or conduct associated activities, for example, alumni associations, to enable the school and the volunteers to work together.

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

To whom may the St Paul's Grammar School disclose personal information?

The St Paul's Grammar School may disclose personal information, including sensitive information, held about an individual, to:

- other schools and teachers at those schools, including another school to which a student transfers to facilitate the transfer of the student;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the school, including specialist visiting teachers, coaches, volunteers, and counsellors;
- providers of specialist advisory services and assistance to the school, including in the area of Human Resources, child protection and students with additional needs;

- providers of learning and assessment tools;
- assessment and educational authorities, including the NSW Education Standards Authority (NESA), Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- agencies and organisations to whom the school is required to disclose personal information for education, funding and research purposes;
- people and organisations providing administrative, technology and financial services to the school;
- recipients of schools publications, such as newsletters and magazines, and the like;
- students' parents;
- anyone who an individual authorises the school to disclose information to; and
- anyone to whom the school is required or authorised to disclose the information to by law, including child protection laws.

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, a school will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual; or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Storage and access as part of centralised information systems: The school uses information management and storage systems (Systems). These Systems are either owned by the school or provided by third party service providers. Personal information is stored with and accessible by the school and the third-party service providers for the purpose of providing services to the school in connection with the Systems and for administering the education of students.

Online or 'cloud' service providers: The school may use online or 'cloud' service providers to store personal information and to provide services to the school that involve the use of personal information, such as services relating to email, file storage, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored on the 'cloud' service provider's servers which may be situated outside Australia. The 'cloud' service providers may provide applications, and store and process limited personal information for this purpose. The school and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering the 'cloud' services and ensuring their proper use

How does the St Paul's Grammar School treat sensitive information?

In referring to 'sensitive information', the St Paul's Grammar School means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health 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 St Paul's Grammar School's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. The St Paul's Grammar School has in place steps to protect the personal information the St Paul's Grammar School holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and pass worded access rights to computerised records.

Updating personal information

The St Paul's Grammar 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 held by the St Paul's Grammar School at any time. The National Privacy Principles require the St Paul's Grammar School not to store personal information longer than necessary.

You have the right to check what personal information the St Paul's Grammar School holds about you

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the St Paul's Grammar School holds about them and to advise the St Paul's Grammar School of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally have access to their personal information through their parents, but older students may seek access themselves. To make a request to access any information the St Paul's Grammar School holds about you or your child, please contact the St Paul's Grammar School in writing. The St Paul's Grammar School may require you to verify your identity and specify what information you require. The St Paul's Grammar 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 St Paul's Grammar School will advise the likely cost in advance.

Consent and rights of access to the personal information of students

The St Paul's Grammar School respects every parent's right to make decisions concerning their child's education. Generally, the St Paul's Grammar School will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The St Paul's Grammar 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. Parents may seek access to personal information held by the St Paul's Grammar School about them or their child by contacting the St Paul's Grammar School. 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 St Paul's Grammar School's duty of care to the student. The St Paul's Grammar School may, at its discretion, on the request of a student grant that student access to information held by the St Paul's Grammar School about them, or allow a student 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 student and/or the student's personal circumstances so warranted.