



KINROSS WOLAROI SCHOOL

PRIVACY POLICY

This Policy is published for students, parents/carers/guardians, prospective parents, applicants for employment, current staff, volunteers and others including past students, staff contractors, visitors and others that come into contact with Kinross Wolaroi School (the School).

The School is bound by the 13 Australian Privacy Principles contained in the Privacy Act 1988 (Cth). In relation to health records, the School is also bound by the Health Records and Information Privacy Act 2002 (NSW).

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.

This Privacy Policy details how the School protects your privacy and how the School complies with its legislative obligations. The statement also describes:

- who we collect information from
- the types of personal information collected and held by us
- how this information is collected and held
- the purposes for which your personal information is collected, held, used and disclosed
- how you can gain access to your personal information and seek its correction.
- how you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled
- whether we are likely to disclose your personal information to any overseas recipients.

Personal Information Collected by the School

The School collects personal information, including information classified as 'sensitive' under the Privacy Act, about students, parents and guardians and during the course of a student's enrolment at the School. The primary purpose of collecting this information is to enable the School to provide education to its students.

Some of the information collected is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care. Further, certain laws governing or relating to the operation of schools require that certain information be collected, such as Public Health and Child Protection laws.

The kind of information we collect is largely dependent upon whose information we are collecting and why we are collecting it, however in general terms the School may collect:

Personal Information including names, addresses and other contact details, dates of birth, next of kin details, financial information, audio visual images and attendance records. Other items we collect (particularly in relation to student and parent records) include religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, professional memberships, family court orders and criminal records.

Health Information (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.

Sensitive information includes information about an individual's racial or ethnic origin, political opinions, professional or political or religious affiliations or memberships, sexual orientation or practices, criminal record, health, genetics and/or biometrics.



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How do we collect your personal information?

How we collect personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you. This may take the form of by way of paper and online 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. Where possible the School has attempted to standardise the collection of personal information by using specifically designed forms (e.g., an Enrolment Form). However, given the nature of School operations, we may also receive personal information through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring.

Health information about students is sensitive information within the terms of the National Privacy Principles under the Privacy Act. The School will ask you to provide medical reports and information about your child from time to time.

We may also collect personal information from other people (e.g., a personal reference) or independent sources (e.g., internet search), however we will only do so where it is not reasonable and practical to collect the information from you directly.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information.”

Where we collect unsolicited information, we will only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means, then we will destroy, permanently delete or de-identify the information as appropriate.

How we use personal information

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

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include but are not limited to:

- providing education, pastoral care, extra-curricular and health services
- satisfying our legal obligations including our duty of care and child protection obligations
- keeping parents informed through correspondence, newsletters and magazines
- marketing, promotional and fundraising activities, School publications, like printed and online newsletters and magazines, which include personal information, may be used for marketing purposes
- supporting the activities of School associations
- helping us to improve our day-to-day operations including training our staff, systems development, developing programs and services, undertaking planning, research and statistical analysis
- school administration including for insurance purposes
- the employment of staff
- the engagement of volunteers

The School retains personal information about past students and staff in the School’s archives, which may be used for the purposes described above.



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In some cases, where the School requests personal information about a student or parent, if the information requested is not provided, 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.

The School from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes to other schools, government departments, medical practitioners and people providing services to the School, including specialist visiting teachers, sports and other coaches and volunteers.

Personal information collected from students is regularly disclosed to their parents or guardians as appropriate. The School uses images and/or names of students as part of recognition of their achievements, their participation and for information about the School. If you do not agree to this, you must inform the Principal in writing.

Parents may seek access to personal information collected about them and their child/ren by contacting the School. Students may also seek access to personal information about themselves. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in breach of the School's duty of care to the student, or where students have provided information in confidence.

From time to time the School engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to related organisations such as the Ex-Students' Association and the Parents and Friends Association that assist in the School's fundraising activities. We will not disclose your personal information to third parties for their own marketing purposes without your consent.

The School may include your contact details in a class or year group list, sporting list or activity list. If you do not agree to this, you must inform the Principal in writing.

When you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish, and that the School does not usually disclose the information to third parties.

Any parent, guardian or other person concerned about any aspect of this notice should contact the Principal.

Use or disclosure of personal information about an individual for a purpose other than those state above, or without consent, will not occur.

Storage and Security of Personal Information

We store 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. Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

The security of your personal information is of importance to us, and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure. These steps include:

- Restricting access to information on the School databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- Implementing physical security measures around the School buildings and grounds to prevent crime.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.



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- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

The School is an organisation that is required to report any known or suspected breaches of our data to the Privacy Commissioner, those affected, and the Office of the Australian Information Commissioner (OAIC).

Our website may contain links to other websites. We do not share your personal information with those websites, and the School is not responsible for their privacy practices.

When we disclose personal information

We only use personal information for the purposes for which it was given to us, or for purposes which are related (or directly related) to one or more of our functions or activities. We may disclose your personal information to government agencies, other parents, other Schools, recipients of School publications, visiting teachers, counsellors and coaches, our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- you have consented
- you would reasonably expect us to use or disclose your personal information in this way
- we are authorised or required to do so by law
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety
- where another permitted general situation or permitted health situation exception applies
- disclosure is reasonably necessary for a law enforcement related activity.

Personal information of students

The Privacy Act does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information.

The School will take a common sense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students and we will treat consents provided by parents/carers as consents provided by a student.

We are however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older students and especially when dealing with personal information), it will be appropriate to seek and obtain consents directly from students.

We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the School's duty of care to the student.



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Disclosure of personal information to overseas recipients

We may disclose personal information about an individual to overseas recipients in certain circumstances, such as when we are organising an overseas excursion, facilitating a student exchange, or storing information with a “cloud computing service” which stores data outside of Australia. We will however take all reasonable steps not to disclose an individual’s personal information to overseas recipients unless:

- We have the individual’s consent (which may be implied)
- We have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime
- 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
- We are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

How we ensure the quality of your personal information

The School takes all reasonable steps to ensure the personal information it collects is accurate, up to date and complete. If you believe that the personal information that the School holds is inaccurate, out of date, incomplete, irrelevant or misleading, please also contact the Principal.

On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed. Please contact us if any of the details you have provided change.

How to gain access to your personal information we hold

You may request access to the personal information we hold about you, or request that we change the personal information, by writing to the Principal.

If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision.

If the rejection relates to a request to change your personal information you may make a statement about the requested change, and we will attach this to your record.

Employment

Under the Privacy Act (Cth) 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 related to a current or former employment relationship between the School and employee.

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 School conducts rigorous and extensive checking and verification to meet the NSW Child Safe Standards.

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

- Administering the individual’s employment or contract, as the case may be.
- Insurance purposes.
- Providing a range of tools and services to staff, volunteers and contractors.
- Marketing the School
- Satisfying the School’s legal obligations, for example, in relation to the various child protection legislation obligations



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Volunteers

The School also obtains personal information about volunteers who assist the School in its functions or associated activities, such as the Ex-Students' Association, Co-curricular sport, Intern Programs / work experience.

Marketing

The School treats marketing 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 such as the Parents and Friends Association or the Alumni membership.

As a rule, the School will not provide your personal information, without your consent, to direct marketing companies.

Privacy Inquiries, Concerns 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 Principal.

The School will investigate any complaint or concern 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. Please note that you may raise such a complaint or concern anonymously or using a pseudonym, however, this will make it difficult to provide you with an outcome to your complaint or concern.

Your complaint or concern may also be lodged with Office of the Australian Information Commissioner.