BURGMANN ANGLICAN SCHOOL

POLICY	PRIVACY POLICY
Policy applies to	Staff, Students, Parents, Carers, Contractors & Volunteers
Related policies	Photography and Videography Policy
Responsible officer	Chief Operating Officer
Approval authority	Principal
Last revision	19 June 2026
Next revision	19 June 2027

SCOPE

This Privacy Policy details how Burgmann Anglican School protects your privacy and how we comply with the requirements of the Privacy Act 1988 (Cth), the Australian Privacy Principles, and the Health Records (Privacy and Access) Act 1997 (ACT), including the Health Privacy Principles.

This policy also describes:

- who we collect information from;
- the types of personal information, sensitive information and health information we collect and hold;
- how this information is collected and held;
- the purposes for which personal information is collected, held, used and disclosed;
- how student images, media permissions and biometric information may be managed;
- 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; and
- whether we are likely to disclose your personal information to overseas recipients.

WHO DO WE COLLECT PERSONAL INFORMATION FROM?

At Burgmann Anglican School, we collect personal information from students, parents and carers, prospective parents and carers, job applicants, staff, volunteers, alumni, contractors, visitors and others who come into contact with the School.

Employee records are not covered by the Australian Privacy Principles or the Health Privacy Principles where they relate to current or former employment relations between the School and the employee.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT?

The kinds of personal information we collect depend on whose information we are collecting

and why we are collecting it. 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; photographic images; video recordings; attendance records; student records; parent and carer contact information; and information relating to student and staff media permissions.

Sensitive information, particularly in relation to student and parent/carer records, including religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, family court orders, criminal records, and other information where relevant to the School's functions or activities.

Sensitive information may also include **biometric information**, including encrypted and irreversible face biometric templates generated from photographic images for the limited purpose of media management, automated media-consent application and safeguarding.

Health information, particularly in relation to student and parent/carer records, including medical records, disabilities, immunisation details, individual health care plans, counselling records, nutrition and dietary requirements.

HOW DO WE COLLECT PERSONAL INFORMATION?

How we collect personal information depends on whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

Where possible, the School uses specifically designed forms, such as enrolment forms, health information forms, excursion forms, consent forms, employment forms and media-permission forms. Given the nature of our operations, we may also receive personal information by email, letters, notes, telephone, face-to-face meetings, online platforms, financial transactions and through surveillance activities such as CCTV security cameras and email monitoring.

We may also collect personal information from other people, such as personal references, previous schools, health practitioners, government agencies, public sources or independent sources, but only where it is not reasonable or practical to collect the information from you directly, or where we are authorised or required to do so.

The School may collect and manage photographic images, video recordings and related media-consent information through contracted school media management platforms, including Pixevety.

Where Pixevety is used, student and staff images may be processed using automated face-matching technology to generate encrypted and irreversible face biometric templates. These templates are used for the limited purpose of helping the School apply and enforce student and staff media-consent preferences within the School's media library.

Sometimes we may be provided with 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 or disclose that information if we could otherwise have collected it by normal means. If that unsolicited information could not have been collected by normal means, we will destroy, permanently delete or de-identify the information as appropriate.

HOW WE USE PERSONAL INFORMATION

We only use personal information that is reasonably necessary for one or more of our functions or activities, 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, co-curricular, extra-curricular and health services;
- satisfying our legal obligations, including our duty of care, child protection and work health and safety obligations;
- supporting student wellbeing, safeguarding and safety;
- keeping parents and carers informed about school community matters through correspondence, newsletters, publications, online platforms and other communications;
- managing, applying and enforcing student and staff media-consent preferences;
- managing school photographs, video recordings, publications and digital media;
- marketing, promotional and fundraising activities, where appropriate permissions have been obtained;
- supporting the activities of school associations, including the Burgmann Anglican School P&F Association;
- supporting community-based causes and activities, charities and other causes connected with the School's functions or activities;
- helping us improve our day-to-day operations, including staff training, systems development, planning, research and statistical analysis;
- school administration, including enrolment, billing, insurance, risk management and compliance;
- the employment of staff; and
- the engagement of volunteers, contractors and service providers.

We only collect sensitive information where reasonably necessary for one or more of the School's functions or activities, and where we have consent from the individual to whom the sensitive information relates, or where another legal basis applies. This may include circumstances where collection is necessary to lessen or prevent a serious threat to life, health or safety, or where another permitted general situation or permitted health situation applies.

If we do not have the relevant consent and a permitted health situation or permitted general situation does not exist, we may still collect sensitive information where permitted by law, including where it relates solely to individuals who have regular contact with the School in connection with the School's activities. These individuals may include students, parents and carers, volunteers, former students and other individuals with whom the School has regular contact in relation to its activities.

We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose, or where another legal basis applies.

STUDENT IMAGES, MEDIA CONSENT AND BIOMETRIC PROCESSING

The School collects and uses student photographs, video recordings and related media-consent information for school administration, teaching and learning, communications, publications, community engagement, promotion, safeguarding, compliance and archival

purposes.

The School uses Pixevety as an internal media administration and consent-management platform. Pixevety helps the School manage its digital media library and apply student and staff media-consent preferences accurately and consistently.

Pixevety may use automated face-matching technology to process photographic images and generate encrypted and irreversible face biometric templates. A face biometric template is a secure digital pattern created from an image so that the system can help identify a student or staff member within the School's media library. Pixevety advises that these templates are encrypted and irreversible, meaning they are designed for matching only and cannot be used to recreate the original image or the person's face.

The templates are used for the limited purpose of identifying individuals in the School's media library so that media-consent preferences can be applied and enforced consistently.

The School does not use Pixevety for student surveillance, behavioural monitoring, attendance tracking, disciplinary monitoring or generative AI image creation.

Families may opt out of Pixevety biometric processing by emailing privacy@burgmann.act.edu.au. If a family opts out, the School will not use Pixevety automated face-matching technology to process that student's image for the purpose of generating face biometric templates. The School will continue to manage that student's media permissions manually where required.

Opting out of Pixevety biometric processing is separate from choosing whether a student's image may be used in promotional, online or print material.

STORAGE AND SECURITY OF PERSONAL INFORMATION

We store personal information in a variety of formats, including on databases, cloud-based systems, hard copy files and school-managed devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is important to us, and we take reasonable steps to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

These steps include:

- restricting access to information on School databases on a need-to-know basis, with different levels of security allocated to staff based on their roles, responsibilities and security profile;
- requiring staff to keep passwords confidential and not reveal or share personal passwords;
- storing hard copy sensitive and health information in secure locations, including lockable filing cabinets and lockable rooms where appropriate;
- restricting access to sensitive and health information to staff who require access for their role;
- implementing physical security measures around School buildings and grounds;
- implementing ICT security systems, policies and procedures designed to protect personal information stored on School systems and networks;
- implementing human resources policies and procedures, including email and internet usage, confidentiality and document security policies;

- undertaking due diligence with respect to third-party service providers who may have access to personal information, including cloud service providers and media management providers;
- seeking contractual assurances from third-party service providers, where appropriate, about privacy, security, confidentiality, storage, retention and deletion;
- limiting collection and use of sensitive information to what is reasonably necessary for the School's functions or activities; and
- securely destroying, deleting or de-identifying personal information that is no longer needed, where legally appropriate.

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

Our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

RESPONDING TO DATA BREACHES

Burgmann Anglican School will take appropriate and prompt action if we have reasonable grounds to believe that a data breach may have occurred or is suspected to have occurred.

Depending on the type and seriousness of the data breach, this may include:

- containing the breach;
- reviewing our internal security procedures;
- taking remedial internal action;
- notifying affected individuals;
- notifying the Office of the Australian Information Commissioner; and
- taking other steps required under the Notifiable Data Breaches scheme or other applicable laws.

If we are unable to notify individuals directly, we may publish a statement on our website and take reasonable steps to publicise the contents of that statement.

WHEN WE DISCLOSE PERSONAL INFORMATION

We only use personal information for the purposes for which it was given to us, or for purposes that are related, or directly related in the case of sensitive information, to one or more of our functions or activities.

We may disclose personal information to government agencies, other parents or carers, other schools, recipients of school publications, visiting teachers, counsellors, coaches, professional advisers, insurers, 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;

another permitted general situation or permitted health situation applies;

disclosure is reasonably necessary for a law enforcement related activity;

disclosure is reasonably necessary for the School's functions or activities and is otherwise permitted by law.

We may disclose personal information and sensitive information to contracted service providers who support the School's media management, privacy, safeguarding and consent-management functions. This includes Pixevety, which serves as the School's contracted service provider to support, manage and protect the School's digital media and to apply and enforce the administration of student and staff media consent.

Pixevety processes School member personal and sensitive information under instruction from the School for the primary purpose of media management and automated consent application and enforcement.

PERSONAL INFORMATION OF STUDENTS

The Privacy Act does not specify an age at which individuals can make their own decisions with respect to their personal information.

At Burgmann Anglican School, we take a practical and child-centred approach to dealing with student personal information. Generally, we will refer requests for student personal information to the student's parents or carers. We will generally treat notices provided to parents or carers as notices provided to students, and consents provided by parents or carers as consents provided by students.

However, we acknowledge that students have rights under the Privacy Act and that, in certain circumstances, especially when dealing with older students or sensitive information, it may be appropriate to seek and obtain consent 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 or carers.

There may also be occasions where parents or carers are denied access to information about their child because providing the information would have an unreasonable impact on the privacy of others, or would result in a breach of the School's duty of care to the student or another person.

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, using cloud computing services, or engaging third-party service providers that store or process information outside Australia.

We will take reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- we have the individual's consent, which may be express or implied;
- we have satisfied ourselves that the overseas recipient is subject to privacy obligations that are substantially similar to 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;

- the disclosure is authorised or required by law; or
- another permitted basis applies.

HOW WE ENSURE THE QUALITY OF YOUR PERSONAL INFORMATION

We take reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date.

These steps include seeking accurate information at the time of collection and updating personal information when we are advised by individuals or when we become aware through other means that personal information has changed.

Please contact us if any details you have provided change. You should also contact us if you believe the information we hold about you is not accurate, complete or up to date.

HOW TO GAIN ACCESS TO YOUR PERSONAL INFORMATION

You may request access to the personal information we hold about you, or request that we correct personal information, by contacting us.

If we do not agree to provide access or to amend personal information as requested, you will be notified accordingly. Where appropriate, we will provide the reason for our decision. If the refusal relates to a request to change personal information, you may make a statement about the requested change and we will attach this to your record where appropriate.

PRIVACY COMPLAINTS

If you wish to make a complaint about a breach by us of the Australian Privacy Principles or the Health Privacy Principles, you may do so by providing your complaint by email, letter, telephone or personal delivery using the contact details below.

We will respond to your complaint within a reasonable time, usually no longer than 30 days, and we may seek further information from you in order to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

PIXEVETY BIOMETRIC PROCESSING OPT-OUT

Families may opt out of Pixevety biometric processing by emailing privacy@burgmann.act.edu.au.

This opt-out relates to automated face matching and biometric template processing only. Photo-use permissions for promotional, online and print material can be selected separately through the School's media-permission process.

If a family opts out, Burgmann Anglican School will not use Pixevety automated face-matching technology to process that student's image for the purpose of generating face biometric templates. The School will continue to manage that student's media permissions manually where required.

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HOW TO CONTACT US

You can contact us about this Policy or about your personal information by:

Email: privacy@burgmann.act.edu.au

Telephone: 02 6255 7700

Post: Privacy Officer, Burgmann Anglican School, 4 The Valley Avenue, Gungahlin ACT 2912

If practical, you may contact us anonymously or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to provide the information or assistance you are seeking.

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website, www.burgmann.act.edu.au, regularly for any changes.