GREAT SOUTHERN GRAMMAR

PRIVACY POLICY

EMBARK ON A JOURNEY OF DISCOVERY

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1 PURPOSE

The School is bound by the Australian Privacy Principles contained in the Privacy Amendment (Enhancing Privacy Protection) Act 2012. This Privacy Policy sets out how the School manages personal information provided to or collected by it. In relation to health records, the School also follows the WA Health Department Community Health Policy and Procedures.

The School may, from time to time, review and update this Privacy Policy to account for new laws and technology, changes to the School's operations and practices to make sure it remains appropriate to the changing school environment.

2 SCOPE

This policy applies to all directors, staff, students, visitors, contractors, contractors' employees and volunteers of Great Southern Grammar School Incorporated (GSG), hereafter referred to as employees. This policy outlines the circumstances in which we obtain information, how we use and disclose information, how we manage requests to access and/or change that information.

3 DEFINITIONS

Personal information	Names, addresses and other contact details, dates of birth, next of kin details, photographic images, attendance records and financial information.
Sensitive information	Particularly in relation to student and parents, including government identifiers i.e TFN, religious beliefs, nationality, country of birth, professional memberships, family court orders and criminal records.
Health information	Particularly in relation to student and parents records including medical records, disabilities, immunisation details and psychological reports.
Record	A record includes a document, electronic or other device. The definition is inclusive and therefore covers a wide variety of material which might constitute a record.

4 ACRONYMS

APP	Australian Privacy Principles
GSG	Great Southern Grammar
OAIC	Office of the Information Commissioner

5 ROLES AND RESPONSIBILITIES

Principal

The Principal has overall responsibility for ensuring compliance with this policy.

6 POLICY STATEMENT

6.1 The information life cycle

1. The School will consider if it is actually necessary to collect and hold personal information in order to carry out our functions or activities;
2. Personal information will be handled using privacy protections;
3. Risks associated with the collection of personal information will be assessed;
4. Appropriate steps and strategies will be undertaken to protect personal information;
5. The School will destroy or de-identify personal information when it is no longer needed.

6.2 What is personal information

Personal information is information or an opinion about an individual from which they can be reasonably identified. Depending on circumstances we may collect personal information from the individual in their capacity as a student, parent, contractor, volunteer, stakeholder, job applicant, alumni, visitors or others that come into contact with the School. In providing services we may collect, personal, sensitive and health information, generally we will seek consent from the individual before we collect their sensitive and health information.

Employee records are not covered by the APPs where they relate directly to current or former employment relationships between the School and the employees.

6.3 Collection of personal information

The School will generally collect personal information if reasonable and practical to do so directly from the individual. There are occasions, depending on circumstances, people other than parents and students provide personal information. We take all reasonable steps to ensure the personal information collected and disclose is accurate, complete and up-to-date, including at the time of using or disclosing the information. If the School becomes aware the information is incorrect or out of date, reasonable steps will be taken to rectify the information.

6.3.1 Access and correction of personal information

Parents, Guardians and students may submit a request for access to relevant personal information we hold or request changes be made to the personal information held. Upon receiving such a request we will take steps to verify identity before granting access or correcting the information. To make a request to access any personal information the School holds about individuals and their children, please contact the Principal in writing. The School may require you to verify your identity and specify required information. 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 we cannot provide access to that information, we will provide written notice explaining the reasons for refusal.

6.3.2 Personal information of students

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

We are aware that children do have rights under the Privacy Act and that in certain circumstances, especially when dealing with older students and with sensitive information,

it will be appropriate to seek and obtain consent directly from students. We 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 and 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.

6.3.3 Personal information of employees

Personal information held by the School, relating to someone's current or former employment, is not covered by the Australian Privacy Principles, but only when used by the employer directly in relation to their employment. This information includes:

- Personal and emergency contact details
- Information about terms and conditions of employment
- Wage or salary details
- Leave balances
- Records of work hours, records of engagement, resignation or termination of employment
- Information about training, performance and conduct
- Taxation, banking or superannuation details
- Union, professional or trade association membership information

Information can be legally disclosed to a third party in some circumstances, for example, information requested by a Fair Work Inspector, government agencies or law, permit holder with right of entry ie union official, information requested by an employee or former employee and providing references.

The School will commit to the privacy principles for employee records even though it is not required by law.

6.4 Solicited information

The School, where possible has attempted to standardise the collection of personal information by using specifically designed forms completed by parents or students. Due to the nature of operations of the School, personal information can also be collected by email, face-to-face meetings, interviews, telephone calls, notes, via the website, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email and device monitoring.

Information can also be collected by a third party or independent sources (referee for prospective employee, report provided by a medical professional or a reference from another school). This will only occur when it is not possible to collect the personal information from the individual directly.

We may collect information based on website usage. We use data collection methods to collate information on website activity, such as visitor activity and the pages visited. This information provides the School with the tools to improve our website, focus for marketing campaigns and statistic recording. We do not use this analysis to identify users.

6.5 Unsolicited information

GSG may be provided with personal information which is unsolicited, this may occur through misdirected emails, postage mail, employment applications for unadvertised positions and additional information not requested by the School. Unsolicited information not collected in normal means will be destroyed, permanently deleted or de-identified as appropriate.

6.6 Collection and Use of Sensitive Information

The School will only obtain sensitive information if it necessary for functions or activities and the School has individual consent, or becomes necessary to lessen or prevent serious threat to life, health or safety, permitted health and general situations. We may share sensitive information to other entities within the School structure if necessary for us to provide our services or products.

The School will use personal information it collects from you for the primary purpose of collection, and for other secondary purposes related to the primary purpose reasonably expected by you, or to which you have consented.

6.7 Use of personal information

GSG only uses personal information as deemed necessary or for a related purpose which would be reasonably expected by you for an activity or event to which you have consented.

6.8 Who might the School disclose personal information to?

The School may disclose personal information, held about an individual which includes, butis not limited to:

- providing education, pastoral care, extra-curricular and health services;
- satisfying legal obligations including duty of care and child protection obligations;
- another school;
- government departments;
- Association of Independent Schools of Western Australia
- medical practitioners;
- requirement by law;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA). School Curriculum and Standards Authority (SCSA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- disclosure that prevents or lessens serious threat to life, health, safety of any individuals;
- people providing services to the School, including specialist visiting teachers, and counsellors;
- recipients of school publications, such as newsletters and magazines;
- marketing, promotional and fundraising activities;
- systems development, undertaking planning and research and statistical analysis;
- school administration, ie insurance purposes;
- staff employment;
- engagement of Volunteers;
- day to day operations improvement, including staff training; and
- anyone a parent or guardian authorises the School to disclose information to.

6.8.1 Marketing and Fundraising

Schools treat 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 students and staff thrive. Personal information held by a school may be disclosed to an organisation that assists in the School's fundraising, for example, the School's Foundation, Parents and Friends Association or Alumni and on occasions, external fundraising organisations. 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.

6.9 Sensitive or Health information

The School will only disclose sensitive or health information for a secondary purpose if reasonably expected and the secondary purpose is directly related to the primary purpose.

6.10 Disclosure of your personal information to overseas recipients

The School follows the principle of data sovereignty and personal information is stored by cloud service providers on Australian soil and not overseas. The School may disclose personal information about an individual to an overseas organisation in the course of providing services, for instance, facilitating a school exchange or entrance to an overseas University.

The School will take all reasonable steps not to disclose send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied);
- the School has satisfied itself that the overseas recipient is otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.
- the School has formed the opinion that disclosure will lessen or prevent serious threat to life, health or safety or an individual or to public safety; or
- the School is taking reasonable action in relation to suspected unlawful activity or serious misconduct.

6.11 Storage and Security of Personal Information

Personal information is stored in a variety of formats including, but not limited to:

- Databases;
- Hard/paper based files;
- Personal devices, including laptops; and
  Third party storage providers such as cloud storage facilities.

The School has taken all reasonable steps to protect the personal information we hold from misuse, loss, authorised access, modification or disclosure. Staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. Staff have restricted access and user privilege to information depending on their role and responsibilities. Hard/paper copy files should be stored securely. Staff have unique passwords which we ensure are not shared. Implementing physical measures around school buildings to ensure security. Ensuring our IT and cyber security systems, policies and procedures are implemented and up-to-date. Ensuring staff are aware and comply with internal policies and procedures when handling information. Undertaking due diligence with respect to a third party service provider who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far

as practicable that they are compliant with the APPs or a similar privacy regime. The destruction, deletion or de-identification of personal information we hold that is no longer needed or required to be retained by any other laws.

6.12 Data Breaches

There is no single method of responding to a data breach. Data breaches must be dealt with on a case-by-case basis, by undertaking an assessment of the risks involved, and using risk assessment to decide the appropriate course of action. Please refer to our Data Breach Policy for further information.

6.13 Enquiries and complaints

If you would like further information about the way the School manages the personal information it holds or wish to complain if you believe the School has breached the Australian Privacy Principles, please notify the Principal in writing as soon as possible. The School will investigate any complaint within a reasonable time. We may seek further information in order to provide a full and comprehensive report.

If you are not satisfied with the response, you may refer the complaint to the OAIC. A complaint can be made using the OAIC online Privacy Complaint Form or by mail, fax or email. A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

GSG can be contacted about this Privacy Policy or about personal information generally by:

Writing to the Principal, Great Southern Grammar, PO Box 1151, ALBANY, WA 6331
Emailing: admin@gsg.wa.edu.au
Telephone: 08 9844 0300

7 REFERENCE/COMPLIANCE

The following documents are associated with this policy:

7.1 Legislation

- *Privacy Act 1988*
- *Privacy Amendment (Enhancing Privacy Protection) Act 2012*
- *Australian Privacy Principals*

7.2 Related Policies

- *Data Breach Policy*
- *Staff Use of Information and Communication Technology Policy*

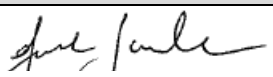
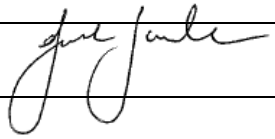
7.3 Internal Documents

7.4 Other Resources

AISWA Privacy Compliance Manual

8 DOCUMENT CONTROL

Approval

Date	By	Signature/Executive
5/10/2018	Mr Mark Sawle - Principal	
21/7/2021	Executive	Minutes dated 21/7/2021
25/2/2022	Mr Mark Sawle - Principal