IVANHOE GIRLS' GRAMMAR SCHOOL

OUR GIRLS SPEAK FOR THEMSELVES.

Policy Title	**Privacy Policy**				
Policy Owner	Director of Corporate Services				
Effective Date	December 2025				
Approved by	Executive				
Review Date	December 2027				
Internal Only Document			Public Only Document	**X**	

1. Policy

This statement outlines the policy on how Ivanhoe Girls' Grammar School (the **School**) uses and manages personal information provided to or collected by it. The School is bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Health Privacy Principles (**HPPs**) contained in the *Health Records Act 2001* (Vic) (**Health Records Act**).
In this policy, "personal information" has the meaning set out in the Privacy Act. Essentially, personal information is information or an opinion about an individual who is reasonably identifiable.

This policy also applies to our management of any "sensitive information" or "health information" (as those terms are defined in the Privacy Act and Health Records Act). For convenience, this policy uses the term "personal information" to collectively refer to "personal information", "health information" and "sensitive information" (as those terms are defined at law), except where otherwise noted.

The Privacy Act and Health Records Act allow individuals to access their personal information and have it corrected (if it is inaccurate, irrelevant, incomplete, misleading or not up-to-date), subject to certain exceptions. The School is committed to protecting privacy and confidentiality in accordance with this policy and the School's obligations under the Privacy Act, the Health Records Act and other applicable laws.

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.

2. Definitions

The School, we, our, us	Ivanhoe Girls' Grammar School
Personal Information	In this policy, "Personal Information" has the meaning set out in the Privacy Act 1988. Essentially, personal information refers to any information or an opinion about an individual who is reasonably identifiable. This policy uses the term "personal information" to collectively refer to "personal information", "health information" and "sensitive information" (as those terms are defined at law), except where otherwise noted.

3. Personal Information

3.1 What kinds of personal information does the School collect?

The types of personal information we collect depends on the circumstances in which the information is collected. The type of information the School collects and holds includes (but is not limited to) personal information, including sensitive and health information about:

- students and Parents and/or guardians (**Parents**) before, during and after the course of a student's enrolment at the School (including information relating to unsuccessful applicants for enrolment), such as name, residential address, email address, phone number and emergency contacts, and in relation to students, details of attendance, performance (academic or otherwise), behaviour, welfare and logs of technology use;
- job applicants, staff members, volunteers and contractors, such as name, residential address, email address, phone number, qualifications and licenses, teaching registration and Working With Children Check and logs of technology use; and
- other people who come into contact with the School (including alumni, donors and other individuals in our network), such as name, email address and contact number.

To assist us in providing a safe and secure environment for our students, staff and the broader school community, and to comply with our legal obligations and duty of care, we may also collect:

- health information such as dietary requirements, allergies, vaccination details, health care plans and any other medical conditions;
- details of any relevant court orders; and
- photos, audio and video of individuals (including via CCTV) at School premises, functions and events.

3.2 Personal Information collected directly

The 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 interviews, telephone calls and electronic methods such as email or via the School's websites and School App.

3.3 Personal Information collected indirectly

In some circumstances the School may be provided with personal information about an individual from a third party or via indirect means. For example, this may include the collection of:

- Health information in medical reports provided by a medical professional
- References from another school or a personal reference from another organisation
- Photographs, audio recordings and video footage taken at School, including School functions and events, including via security cameras (CCTV) at our premises

3.4 Exception in Relation to Employee Records

The Privacy Act contains certain exemptions that apply to the School's handling of employee records (other than employee health records) for purposes that are directly related to a current or former employment relationship between the School and the employee.

The School may rely on these exemptions (and other applicable exemptions at law), and this Privacy Policy does not apply in circumstances where the School relies on such an exemption.

3.5 Collection of Personal Information through the Websites

Information is automatically collected through your use of the Ivanhoe Girls' Grammar School websites (including sub-sites of the School such as Ivanhoe Girls' Aquatics and Performing Arts).

We may use temporary (session) cookies or permanent cookies when you access our website. This allows us to recognise your browser and track the web pages you have visited. Cookies are small text files that websites may place on your computer or device. Most often, cookies are used to recognise repeat users of websites and remember user preferences. Cookies are also used to allow the website to track usage behaviour and aggregate data to allow the School to customise a user's experience on our website.

The information may be used and disclosed by the School for purposes including statistical analysis, and to assist the School to improve the functionality and usability of marketing materials, including the website. You can switch off cookies by adjusting the settings on your web browser.

Services that our website may use from time to time include Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics

to help us understand website traffic and webpage usage. By using our website, you consent to the processing of data about you by Google in the manner described in Google's most updated version of its Privacy Policy (located on the Google website) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

We are constantly developing and enhancing our use of online technologies, and make reasonable efforts to ensure we keep this Privacy Policy and related documents up to date in this regard.

3.6 Collection notices

As required by the Privacy Act and the Health Records Act, the School will take reasonable steps to provide you with collection notices, explaining what we are collecting and why, at or around the time that we collect personal information about you.

These collection notices will explain matters such as how we will use the information and who we might share it with. Collection notices may provide more specific information than contained in this Policy. We encourage you to read all collection notices carefully.

3.7 How will the school use and disclose the personal information you provide

The School will use and disclose personal information it collects from you for the primary purpose of collection. The primary purpose of collection will depend on the circumstances in which the information was collected. This Policy sets out some of the primary purposes for which personal information is collected about students and Parents, job applicants and staff, contractors and volunteers (see below).
The School may also use and disclose personal information for such other secondary purposes that are:

- related to the primary purpose of collection and reasonably expected, or to which you have consented; or
- otherwise permitted, required or authorised by law. For example, this may include:
  - mandatory disclosures that are required under child protection legislation; and
  - discretionary disclosures that are authorised by law in circumstances where the School reasonably believes that the disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety.

Students and Parents: In relation to personal information of students and parents, the School's primary purpose of collection is to enable the School 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 the School collects, holds, uses and discloses personal information of students and Parents include:

- looking after students' educational, social and medical wellbeing; to keep Parents informed about matters related to their child's schooling, through correspondence, online communication platforms, newsletters and magazines;
- day-to-day administration;
- in respect of photos, videos and audio of students (and sometimes their Parents) taken at School functions and events, and student work, to include it in School publications, media and advertising (including online) in accordance with our Photography, Filming and Publishing Policy;
- fundraising and donor-engagement activities, including working with specialist service providers who analyse publicly available information to help identify individuals who may have capacity to provide additional fundraising support; and
- meeting the School's legal obligations and discharging 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.

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, as the case may be.

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;
- for insurance purposes;
- seeking funds and marketing the School;
- satisfying the School's legal requirements.

Volunteers: the School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as alumni activities, to enable the School and the volunteers to work together.

Development, marketing and fundraising: The School treats marketing and seeking donations for its future growth and development as an important part of ensuring the School continues to be a quality learning environment in which both students and staff thrive.

Where you have consented or where it is otherwise permitted by law, personal information (other than sensitive information) that is held by the School may be shared with organisations that assist in the School's fundraising and community engagement activities. These third parties include alumni associations and service providers who assist with our fundraising and community engagement activities (for example, utilising service providers that screen contact details against publicly available information to help the School identify individuals who have capacity to provide additional fundraising support).

Parents, staff, contractors and other members of the wider School community may, from time to time, receive fundraising information and School publications, like newsletters (digital and printed) and magazines.

You can opt out of receiving further marketing materials (including in relation to our fundraising activities) from the School by:

- Contacting us (either via the contact details provided on the communication received or via the details at the end of this Policy);
- Advising us if you receive a marketing call that you no longer wish to receive these calls; or
- Using the unsubscribe facility that we include in the relevant documentation.

3.8 To whom might the school disclose personal information

The types of organisations and persons with whom we share your personal information will depend on the nature of our relationship with you, and the particular facts and circumstances.

- In connection with the purposes outlined above, the School commonly discloses personal information, and in some cases sensitive and health information, held about an individual to:
- another school or educational institution;
- government departments;
- medical practitioners, or other health related professionals;
- people providing services to the School, including specialist visiting teachers, consultants, counsellors and sports coaches;
- our suppliers, contractors and organisations that provide us with technical and support services or who manage some of our business functions;
- service providers who support the School's fundraising and community engagement activities;
- recipients of School reports and publications, including digital and printed newsletters and magazines;
- Ivanhoe Girls' Old Grammarians Association (IGOGA) and the Ivanhoe Girls' Grammar School Parents' Association (IGGSPA);
- law enforcement agencies;
- debt collection agencies;
- Parents;
- anyone to whom you authorise the School to disclose information;
- our accountants, insurers, lawyers, auditors and other professional advisers; and

- parties to whom we are permitted, required or authorised by law to disclose your personal information (for example, in order to comply with our compulsory obligations under child protection laws).

Sending information overseas: The School does not routinely disclose personal information to overseas recipients in the course of ordinary, day-to-day operations. The School may periodically disclose personal information about an individual to overseas recipients on a case by case basis - for example to facilitate a school exchange. In such circumstances, the School will not send personal information about an individual outside Australia without obtaining the consent of the individual (in some cases this consent will be implied), or otherwise complying with the APPs, HPPs or other applicable privacy legislation.

3.9 How does the school treat sensitive information

In referring to "sensitive information", the School means: information relating to a person's racial or ethnic origins, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record or health information.

The term "sensitive information", as defined in the Privacy Act, also covers genetic information, biometric information used for biometric verification or identification, and biometric templates. However, the School does not generally collect or handle these types of sensitive information.

Sensitive information about you will be used and disclosed only for the primary purpose for which it was collected or a directly related secondary purpose that would be reasonably expected by you, unless you agree otherwise, or the use or disclosure of that sensitive information is otherwise permitted, required or authorised by law.

3.10 Management and security of personal information

The School's staff are required to respect and take seriously the confidentiality of students' and Parents' personal information and the privacy of individuals.

The School has in place reasonable steps to protect the personal information the School holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

The School also takes reasonable steps to destroy or de-identify personal information in accordance with the School's obligations under the Privacy Act, Health Records Act and any other applicable laws.

3.11 Updating personal information

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date and provides specific portals to both Parents and staff through which updates to personal information can be made. A person may also seek to update their personal information held by the School by contacting the School's Director of Corporate Services (see "Contact Details" section below) at any time.

3.12 You have the right to request access or correction of personal information that the school holds about you

Under the Privacy Act and Health Records Act, an individual has the right to:

- Request access to any personal information or health information which the School holds about them; and request correction of that information if the individual considers that the information is inaccurate, irrelevant, incomplete, misleading or not up-to-date.

- There are some exceptions to these rights, which are set out in the Privacy Act and Health Records Act. If the School refuses your request for access or correction based on one or more of these exceptions, the School will provide you with a notice explaining the reasons

- Please also refer to the section of this policy entitled "Consent and Rights of Access to the Personal Information of Students" for further details about how the School handles requests relating to students' personal information

- The School will handle any requests for access or correction that we receive in accordance with its obligations under the Privacy Act, Health Records Act and applicable laws
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- For administrative purposes, students will generally have access to their personal information through their Parents. If you are a student and you wish to request access or correction of your personal information directly, please speak with your teacher or the School's Director of Corporate Services (see "Contact Details" section below)

- To make a request to access any information the School holds about you or your child, please contact the School's Director of Corporate Services in writing

- The School may require you to verify your identity and specify what information you require. There is no charge for submitting a request for access or correction. However, where permitted by law, 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

3.13 Consent and rights of access to the personal information of students

The School respects every parent's right to make decisions concerning their child's education.
Generally, the School will refer any request for consent and notices in relation to the personal information of a student to the student's Parents.

Parents may seek access to personal information held by the School about them or their child by contacting the School's Director of Corporate Services (see "Contact Details" section below). However, there will be occasions when access may be 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 School's duty of care or other legal obligations to the student.

The School may, on a case by case basis, on the request of a student grant that student access to information held by the School about them, or allow a student to give or withhold consent to the use of their personal information, independently of their Parents. The School's policy is that this would normally be done only when the student involved had reached 18 years of age, but the School could do so in other circumstances when the maturity of the student and/or the student's personal circumstances so warranted.

3.14 Notifiable data breach

Under the *Privacy Act 1988*, the Notifiable Data Breach (NDB) Scheme makes it compulsory for the School to notify specific "eligible data breaches" to individuals affected by the breach, and to the Office of the Australian Information Commissioner (**OAIC**).

In simple terms, a data breach occurs where personal information, tax file number information or certain types of consumer credit information held by the School is lost or subjected to unauthorised access, modification, disclosure or other misuse or interference.

To become a reportable "eligible data breach" a data breach must be likely to result in serious harm to any of the individuals to whom the information relates.

3.15 Disposal

Where records held by the School are no longer required for current operational purposes, the School will either securely store, or destroy, those records. Any documents associated with allegations of child abuse are reasonably likely to be required for current or future legal proceedings, will be retained permanently and will not be disposed or destroyed.

3.16 Enquiries and complaints

If you would like further information about the way the School manages the personal information it holds about you or your child, or wish to complain that you believe that the School has breached the APPs or the HPPs, please contact the School's Director of Corporate Services (see "Contact Details" section below). The School will investigate any complaint and will notify you of the decision in relation to your complaint as soon as is practicable. We take all complaints seriously and will respond to your complaint in accordance with any applicable timeframes imposed by law and otherwise within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.
If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5288, Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

Where the complaint relates to health information, you may also contact the Health Complaints Commissioner:

Health Complaints Commissioner
Level 13, 2 Lonsdale Street, Melbourne Victoria 3000
Telephone: 1300 582 113
Online: https://hcc.vic.gov.au/make-complaint

Contact Details

Director of Corporate Services
Ivanhoe Girls' Grammar School
123 Marshall Street
IVANHOE VIC 3079
AUSTRALIA

Telephone: +61 3 9490 6222
Email: enquiries@ivanhoegirls.vic.edu.au

Further information on the Privacy Act is available on https://www.oaic.gov.au