Introduction

The Anglican Schools Commission (Inc.), trading as AngliSchools ("AngliSchools"), Privacy Policy sets out how Swan Valley Anglican Community School (the School) manages personal information provided to or collected by it. The School is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988.

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.

Employee records

Employment records for past and present staff are exempt from the Privacy Act. However, where State or Territory health privacy legislation applies, we are still required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.

What is personal information?

Personal information is information or an opinion that allows someone to identify the individual that the information or opinion is about. It can range from very detailed information such as medical records to other less obvious types of identifying information such as an email address. Personal information collected about students, parents/guardians (parents), job applicants, staff members, volunteers and contractors.

Personal information includes, but is not limited to, name, address and other contact details; date of birth; next of kin details; previous school; medical information; financial information; photographic images; attendance records; professional development history; complaint records and investigation reports and leave details.

Sensitive information includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, government identifiers, nationality, country of birth, languages spoken at home, family court orders, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, or criminal record.

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

Unsolicited personal information is personal information we receive that we have taken no active steps to collect such as an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement. We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

What kind of personal information do we collect?

We will only collect personal information that is relevant to our relationship with the individual. The type of personal information we collect, and hold includes, sensitive and unsolicited personal information, about:

- students and parents or guardians before, during and after the course of the student's enrolment at the School;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the School

Why do we collect personal information?

The School uses the personal information provided to it, for the primary purpose of education, and for such other secondary purposes as are related to education and reasonably expected, or to which you have consented. 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 primary purpose for which the School uses personal information includes, but is not limited to:

- keeping parents informed about matters related to their child's schooling through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after students' educational, social, emotional and medical well-being;
- satisfying the School's legal obligations and allowing the School to discharge its duty of care;
- performing research and statistical analysis;
- protecting the security of our offices, staff, students, visitors and the property held on our premises;
- recruiting staff and contractors to assess and (if successful) to engage the applicant or contractor, as the case may be;
- seeking donations or marketing the School including direct marketing, campaigns, events and competitions.

We may also collect, hold, use and disclose personal information for other purposes, explained at the time of collection, which are required or authorised by or under law or for which permission has been provided.

Volunteers

Personal information about volunteers who assist the Schools in its functions or conduct associated activities, such as alumni associations, the Board and school council or committee members, is collected to enable AngliSchools and the volunteers to work together.

Direct marketing and fundraising

We may use your personal information to let you know about our products and services. We may contact you for these purposes in a variety of ways, including by mail, email, SMS or telephone. Sensitive information will not be used for direct marketing or fundraising without your consent.

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 be a quality-learning environment in which both students and staff thrive. Personal information held by the School maybe disclosed to an organisation that assists in the School's fundraising.

Where you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, 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 our commercial electronic messages.

If we have collected personal information that we use to send you marketing communications from a third party, you can ask us to notify you of our information source and we will provide this unless this is unreasonable or impracticable.

Exception in relation to related schools

The Privacy Act allows the School, being legally related to other schools, to share personal (but not sensitive) information. Other schools may then only use personal information for the purpose for which it was originally collected. This allows our schools to transfer information between them, for example, when a pupil transfers from one of our schools to another.

To whom may we disclose your personal information?

From time to time external organisations will have access to the School's data as part of the maintenance of the School's on-site information systems. These organisations can have incidental access to personal information, but they are contractually bound not to copy or disclose any information stored in our systems and the Commonwealth Privacy Act also binds these Australian organisations.

We may share your personal information with third parties where appropriate for the purposes set out under Why Do We Collect Personal Information including, but not limited to:

- other schools and teachers at those schools;
- government departments;
- the school's local diocese and the parish, other related church agencies/entities, and schools with other Dioceses/other Dioceses;
- the Schools local parish;
- assessment and educational authorities;
- people providing administrative and financial services to the School;
- health professionals;
- third parties providing services to the School, including: visiting teachers, sport and other co-curricular coaches, teachers, counsellors and collection agencies;
- recipients of our newsletters and magazines;
- pupils' and parents or guardians;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required or authorised to disclose the information by law, including child protection laws.

Sending information overseas

We may disclose personal information to parties located overseas in the following situations:

- Parents and guardians of students who live overseas, including host families for students on exchange.
- Promotional material will be posted on the School's official social media accounts. Otherwise, staff members are not permitted to copy any personal information about anyone in the School community to any social media sites.
- The School will use cloud-based services, which require some personal information to be sent to data centres external to Australia. Only organisations that have similar regulatory requirements as that of the Commonwealth Privacy Act are used. One such example is an email service that sends bulk email to our parents. In this situation, only the parents' names and email addresses are uploaded. No information is provided that is irrelevant to the operation.
- Individual staff will also use cloud-based services as part of the day-to-day management or assessment of the students in their care. Examples of such services include Office 365, DropBox and Google Docs.
- As part of the day-to-day management or assessment of the students, individual staff will use School-owned Apple devices that synchronise and backup to Apple's iCloud.

How do we collect personal information?

When we collect personal information about you, we will take reasonable steps to outline why we are collecting the information, whether it will be shared and if it is shared, with whom.

We collect personal information in a number of ways, including but not limited to:

- in person – for example, at information mornings or through the School administration;
- from the School website;
- over the telephone;
- face-to-face meetings;
- through hard copy and electronic correspondence, such as letters and emails;
- on forms, both hard copy and electronic – for example, enrolment applications;
- through security cameras;
- from third parties, including doctors and other health professionals.

In some circumstances, the School may be provided with personal information about an individual from a third party; for example: a report provided by a medical professional, a reference from another school or a photograph from the School-appointed photographer. When provided with unsolicited personal information this information will be kept, either destroyed or de-identified as described under unsolicited personal information.

If you don't provide us with your personal information

We will provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us, if it is lawful and practicable to do so.

In some cases, however, if you do not provide us with your personal information when requested, we may not be able to provide you with the product or service that you are seeking. If the School requests personal information about a student or parent, which parents are unwilling to provide, the School may not be able to enrol or continue the enrolment of a student.

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 or guardians. The School will treat consent given by parents or guardians as consent given on behalf of the student and notice to parents or guardians will serve as notice given to the student.

Individuals may seek access to personal information held by the School about them or their child by contacting the Privacy Officer. However, there will be occasions when access is denied – i.e. when release of the information would have an unreasonable impact on the privacy of others or when the release may result in a breach of the School's duty of care to the student.

Before releasing information, the School may require you to verify your identity and specify the information you require. 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.

The School may, at its discretion, 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 or guardians. This would normally be done only when the student involved has 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.

How do we manage and make secure personal information?

The School staff are required to respect the confidentiality of students and parents' personal information and the privacy of individuals.

We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files. We take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up-to-date and complete and (in the case of use and disclosure) relevant;
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

You can help us keep your information up-to-date, by letting us know about any changes to your details, such as your name, address, postal address, email address or telephone number. The APPs require the School not to store personal information longer than is necessary.

Notification of Data Breach

If the school discloses your personal information without your permission and not in accordance with this policy, and such breach is likely to result in serious harm, we will notify you and the Office of the Australian Information Commissioner (OAIC). If there is unauthorised access to our information systems and this breach is likely to result in harm, we will notify you and the OAIC.

This notification will include a description of the breach, the kinds of information concerned and the steps to be taken because of the data breach.

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

Correction of personal information

Please contact our Privacy Officer (details below) if you would like to access or correct the personal information that we currently hold about you. We may ask you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

Complaints

If you have a complaint about how we have collected or handled your personal information, please contact our Privacy Officer (details below). Our Privacy Officer will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter in a timely manner.

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner or, in some instances, other regulatory bodies, such as the Australian Communications and Media Authority.

Contact details

Please contact the School if you have any queries about the personal information that the School holds or the way that we handle your personal information.

Privacy Officer

Address: Locked Bag 2, ELLENBROOK WA 6069

Email: Privacy@svacs.wa.edu.au

Telephone: (08) 9297 9506

Additional general information about privacy is available on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au or by calling the OAIC's enquiry line at 1300 363 992.

Changes to our Privacy Policy

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website regularly for any changes.

This Privacy Policy was last reviewed: **August 2024**