



Privacy Policy

PURPOSE

This Privacy Policy sets out how St Andrew's School manages personal information provided to or collected by the school. The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 (Cth) ('the Act').

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.

The current version of this Privacy Policy is published on our website.

SCOPE

This policy applies to all staff (past and present), students, parents and old scholars of St Andrew's School, School Board members, volunteers, contractors and members of the school community in general.

As required by the Act, the School has appointed a Privacy Officer who will oversee the implementation of this policy and be the point of contact for queries relating to the collection and handling of personal information. The role of Privacy Officer will be undertaken by the Principal.

POLICY

The kinds of personal information the School collects

The types of information the School collects includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents and/or guardians ('parents') before, during and after the course of a student's enrolment at the School, including:
 - » name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
 - » parents' education, occupation, language spoken at home, nationality and country of birth;
 - » health information (e.g., details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports and names of doctors);
 - » results of assignments, tests and examinations;
 - » conduct and complaint records, or other behaviour notes, and school reports;
 - » information about referrals to government welfare agencies;

- » counselling reports;
- » health fund details and Medicare number;
- » any Family Court orders;
- » criminal records;
- » volunteering information; and,
- » photos and videos at School events.
- job applicants, volunteers and contractors, including:
 - » name, contact details (including next of kin), date of birth, and religion;
 - » information on job application;
 - » professional development history;
 - » salary and payment information, including superannuation details;
 - » health information (e.g., details of disability and/or allergies, and medical certificates);
 - » complaint records and investigation reports;
 - » leave details;
 - » photos and videos at School events;
 - » workplace surveillance information; and
 - » work emails and private emails (when using work email address) and Internet browsing history.
- other people who come into contact with the School, including name and contact details and any other information necessary for the particular contact with the School.

How the School collects personal information

Personal information you provide: The School will generally collect personal information about an individual directly from that individual, (or their parent in the case of students). This includes by way of forms, face-to-face meetings and interviews, queries submitted through the school website or by emails and telephone calls. On occasions people other than parents and students provide personal information.

Personal information provided by other people: 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 referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

Personal information from other sources: We may also collect personal information through surveillance activities (such as CCTV security cameras) and monitoring of school email addresses and social media.

Exception in relation to employee records: Under the Act, the Australian Privacy Principles do not apply to an employee record. As a result, the practices described in this Privacy Policy does not apply to the School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and employee.

Purposes for which we collect, use and disclose personal information provided by you

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

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 and school activities;
- satisfy the needs of parents, the needs of students and the needs of the School throughout the whole period a student is enrolled at the School;
- make required reports to government authorities;
- keep parents informed about matters related to their child's schooling, through correspondence, apps, newsletters and magazines;
- ensure day-to-day administration of the School;
- look after students' educational, social and health wellbeing;
- seek donations for the School (see the 'Fundraising' section of this Privacy Policy); and
- satisfy the School's legal obligations and allow the School to discharge its duty of care.

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.

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 and discloses personal information of job applicants, staff members and contractors include:

- assessing and (if successful) engaging the applicant or contractor;
- administering the individual's employment or contract;
- for insurance purposes;
- seeking donations for the School (see 'Fundraising' section of this policy) and
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

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

- contact with you about, and to administer, the volunteer position;
- for insurance purposes; and,
- satisfying the School's legal obligations, for example, in relation to child protection legislation

Marketing and Fundraising: The School treats marketing and seeking donations 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 in the School's fundraising, for example, the School's Foundation or alumni organisation (or, 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.

If you do not wish to receive direct marketing communications from the School, please advise us in writing.

Who we may disclose personal information to

The School may disclose personal information, including sensitive information for educational, care and administrative purposes, and to seek support and advice. This may include to:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the School, including specialist visiting teachers, sports coaches, volunteers, and counsellors;
- providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection and students with additional needs;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- people providing administrative and financial services to the School;
- recipients of School publications, such as newsletters and magazines;
- students' 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 to by law, including child protection laws.

Sending and storing information overseas

The School may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia or to facilitate a school exchange. However, the School will not disclose personal information about an individual to an overseas recipient without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

How we store personal information

We store your personal information in hard copy and electronically. We use information management and storage systems provided by third party service providers. Personal information is stored with and accessible by the third-party service providers for the purpose of providing services to the School in connection with the systems.

The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information.

Management and security of personal information

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

The School takes active steps to protect the personal information the School holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records. 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/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 break-ins;
- implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks;
- 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; and,
- 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.

How the School treats sensitive information

In referring to 'sensitive information', the School means information and opinion relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose reasonably expected by you, secondary purposes that you have consented to, or the use or disclosure of the sensitive information is required or allowed by law.

Access and correction of personal information

Under the Act, an individual has the right to obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy and request correction. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or update any personal information the School holds about you or your child, please contact the Principal in writing. The School may require you to verify your identity and specify what 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. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for the refusal.

We will respond to all requests for access or correction within a reasonable time.

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 requests for consent and notices in relation to the personal information of a student to the student's parents. The School will treat consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

As stated above, parents may seek access to personal information held by the School about them or their child by contacting the Principal. However, there may be occasions when access is denied. Such occasions may include (but are not limited to) where release of the information will have an unreasonable impact on the privacy of others, or where providing access would be unlawful, such as breach of confidence.

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. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Enquiries 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 our Privacy Officer:

The Principal
St Andrew's School
22 Smith Street, Walkerville SA 5081
Phone: 08 8168 5537
Email: principal@standrews.sa.edu.au

The School will investigate any complaint 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.

If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (OAIC) via the OAIC website: www.oaic.gov.au.

Related documents

- Privacy Act 1988 (Cth)
- Privacy Amendments (Enhancing Privacy Protection) Act 2012 (Cth)

- Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)
- Standard Collection Notice (Attached)
- Contractor/Volunteer Collection Notice (Attached)
- Employment Collection Notice (Attached)
- Alumni Collection Notice (Attached)

AUTHORISATION

Version reference:	14
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Policy owner:	School Principal / Business Director
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STANDARD COLLECTION NOTICE

St Andrew's School collects personal information, including sensitive information about students and parents/guardians before 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 schooling and educational services for your child.

1. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
2. Certain laws governing or relating to the operation of schools require that certain information is collected. These include Public Health and Child Protection laws.
3. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Commonwealth Privacy Act (as amended).
4. 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 coaches and volunteers.
5. If we do not obtain the information referred to above we may not be able to enrol or continue the enrolment of your child.
6. Personal information collected from students is regularly disclosed to their parents/guardians. On occasions information (written or photographic) such as academic and sporting achievements, student activities and other news is published in School newsletters, magazines, on our website and used for publicity purposes.
7. Parents/guardians may seek access to personal information collected about them and their child by contacting the School. Older students may also seek access to personal information about them. 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 a breach of the School's duty of care to the student, or where students have provided information in confidence.
8. The School from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.

This Collection Notice is to be read in conjunction with the School's Privacy Policy which is available on the School's website, www.standrews.sa.edu.au, or from the School office.

ALUMNI COLLECTION NOTICE

St Andrew's School collects personal information, including sensitive information about students and parents/guardians before 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 schooling and educational services for your child.

- St Andrew's School Old Scholars' Association or St Andrew's School may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of St Andrew's School and to keep alumni members informed about other members.
- We must have the information referred to above to enable us to continue your membership of the St Andrew's Old Scholars' Association.
- As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by St Andrew's School to assist in its fundraising activities. If you do not agree to this, please advise us in writing to the School at 22 Smith Street, Walkerville SA 5081 or by telephone on (08) 8168 5555.
- St Andrew's School Old Scholars' Association may publish details about you in The Bell and on the School's website. If you do not agree to this you must advise us now.
- You may seek access to personal information collected about you by contacting us, care of the School.
- If you provide personal information to us about other people, we encourage you to inform them of the above matters.

This Collection Notice is to be read in conjunction with the School's Privacy Policy which is available on the School's website, www.standrews.sa.edu.au, or from the School office.

CONTRACTOR/VOLUNTEER COLLECTION NOTICE

In applying to provide your services you will be providing St Andrew's School with personal information. We can be contacted at 22 Smith Street, Walkerville; via email at admin@standrews.sa.edu.au or by telephone on (08) 8168 5555.

1. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
2. You agree that we may store this information.
3. Access to this information may be available to you if you ask the School for it.
4. We will not disclose this information to a third party without your consent.
5. If you provide us with the personal information of others, 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.

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EMPLOYMENT COLLECTION NOTICE

1. In applying for this position you will be providing St Andrew's School with personal information. We can be contacted at 22 Smith Street, Walkerville, 5081 or admin@standrews.sa.edu.au or 08 8168 5555.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted.
5. We are required to conduct a criminal record check and collect information regarding whether you have or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws.* We may also collect personal information about you in accordance with these laws.*
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.*
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

*If applicable.

This Collection Notice is to be read in conjunction with the School's Privacy Policy which is available on the School's website, www.standrews.sa.edu.au, or from the School office.