



## **C13 - PRIVACY POLICY – PULTENEY GRAMMAR SCHOOL**

### **1. Statement of Purpose**

This policy outlines how Pulteney Grammar School (the School) uses and manages personal information that is provided to it and that it collects. It is also a guide to Pulteney staff as to the standards to be applied in respect of handling personal information and ensures consistency in the School's approach to Privacy.

The School is bound by the Australian Privacy Principles ("APPs") contained in the Commonwealth Privacy Act and will collect, use and retain personal information in accordance with those Principles.

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

### **Australian Privacy Principles**

The APPs set minimum standards that relate to the collection, security, storage, use, correction and disclosure of personal information and access to that information.

- APP 1: Open and transparent management of personal information
- APP 2: Anonymity and pseudonymity
- APP 3: Collection of solicited personal information
- APP 4: Dealing with unsolicited information
- APP 5: Notification of the collection of personal information
- APP 6: Use or disclosure of personal information
- APP 7: Direct marketing
- APP 8: Cross-border disclosure of personal information
- APP 9: Adoption, use or disclosure of personal information
- APP 10: Quality of personal information
- APP 11: Security of personal information
- APP 12: Access to personal information
- APP 13: Correction of personal information

### **2. Scope**

This policy applies to all employees, board members, consultants, volunteers and contractors of the School and all events and activities conducted by the School or those attended as representatives of the School, whether on or off site.

### 3. Definitions

The Privacy Act covers the following types of information:

Personal Information – means information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not, and whether the information is recorded in a material form or not. It includes all personal information regardless of its source. Personal information does not include information that has been de-identified so that the individual is no longer identifiable.

Sensitive Information - means a type of personal information that is given extra protection and must be treated with additional care. It 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, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health Information.

Health Information - means any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided to an individual currently or in the future. Health information also includes personal information collected in the course of providing a health service.

### 4. Procedures

#### Types of Personal Information collected and held by the School

The type of information the School collects and holds 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;
- job applicants, staff members, school board members, volunteers and contractors; and
- other people who come into contact with the School.

This may include contact details, student enrolment information, health information and employment history for staff.

- **Personal Information you provide:** The School will generally collect personal information held about an individual directly from that individual by way of forms filled out by parents or students, face-to-face meetings and interviews, on-line surveys, emails and telephone calls. On occasions people other than parents and students may 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 or a reference from another school.
- **Exception in relation to employee records:** Under the Privacy Act the APPs do not apply to an employee record. As a result, 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.

### **Use of Personal Information You Provide**

The School will use 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 for the student. This includes satisfying the needs of parents, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School.

The purposes for which the School uses personal information of students and parents include:

- to satisfy the School's legal obligations and allow the School to discharge its duty of care
- looking after students' educational, social and medical wellbeing
- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- day-to-day administration of the School
- seeking donations and marketing for the School

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, board members and contractors**

In relation to personal information of job applicants, staff members, board members and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member, board member or contractor, as the case may be.



The purposes for which the School uses personal information of job applicants, staff members, board members and contractors include:

- administering the individual's employment or contract, as the case may be
- to satisfy the School's legal and legislative obligations
- for insurance purposes
- seeking donations and marketing for the School

### **Volunteers**

The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as The Pulteney Old Scholars' Association and Parents and Friends of Pulteney, to enable the School and the volunteers to work together.

### **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 Parents and Friends of Pulteney and the Pulteney Foundation.

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 the Marketing and Communications Office.*

### **Disclosure of Personal Information**

For administrative and educational purposes the School may from time to time disclose personal and sensitive information held about an individual to:

- another school
- government departments
- medical practitioners
- people providing services to the School, including specialist visiting teachers, counsellors and coaches
- recipients of School publications, such as newsletters, magazines and the Yearbook
- parents and guardians
- anyone you authorise the School to disclose information to
- anyone to whom we are required to disclose the information to by law



## **Sending information overseas**

Personal information about an individual may be sent to overseas recipients, for instance, when staff or students utilise digital tools to conduct on-line surveys, or when storing personal information with 'cloud' service providers that are situated outside Australia, or to facilitate a school exchange. However, the School will not directly 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

## **Treatment of Sensitive Information**

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is required or allowed by law.

## **Management and Security of Personal Information**

School staff members are required to respect the confidentiality of personal information and the privacy of individuals. Through the use of various methods, including locked storage of paper records, data encryption and password access rights to computerised records, the School takes active steps to protect the personal information it holds from misuse, interference, loss and unauthorised access, modification or disclosure.

## **Access and Correction of Personal Information**

Under the Commonwealth Privacy Act an individual has the right to obtain access to any personal information that 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 or the Business Director 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.

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

There may be occasions when access may be denied. Such occasions would include where release of the information might 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 to an individual. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.



## **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.

Parents may seek access to personal information held by the School about them or their child by contacting the Principal or the Business Director in writing. However, there may be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, where the disclosure may result in a breach of the School's duty of care to the student, or where students have provided information in 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 so warranted.

## **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 the Privacy Officer in writing. 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.

Contact details for further information, request for access, correction or complaints:

Pulteney Grammar School  
190 South Terrace  
Adelaide SA 5000  
Phone: 8216 5502

## **Appendices:**

Appendix 1: Standard Collection Notice

Appendix 2: Pulteney Old Scholars' Association Collection Notice

Appendix 3: Employment Collection Notice

Appendix 4: Contractor/ Board Member/ Volunteer Collection Notice

Approved by Executive July 2018

Ratified by Board August 2018

Date for review: June 2020

Policy developer: Business Director

External sources: Association of Independent Schools of South Australia

Version: 5



## APPENDIX 1:

### Standard Collection Notice

- The School collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the School. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the School to provide schooling to the student and to enable them to take part in all the activities of the School.
- 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.
- Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
- Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may ask you to provide medical reports about students from time to time.
- The School from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes to other schools, tertiary institutions and admissions agencies, government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, coaches, volunteers and counsellors.
- Personal information collected from students is regularly disclosed to their parents or guardians
- The School may store personal information in the 'cloud', which means that it resides on servers that may be situated outside Australia.
- The School's Privacy Policy, which can be found on the Pulteney website [www.pulteney.sa.edu.au](http://www.pulteney.sa.edu.au) sets out how parents or students may seek access to personal information collected about them. However, there may 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.
- The School Privacy Policy also sets out how you may complain about any perceived breach of the Australian Privacy Principles and how the School will deal with such a complaint
- The School from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. Please advise us if you do not agree to this by using the Opt Out election below. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
- On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our website and on other digital platforms like Facebook and Twitter. Photographs of student activities such as sporting events, school camps and school excursions may be taken for publication in any or all of these forms of media. The School will



obtain permission from each student's parent or guardian at the beginning of each school year.

- After obtaining consent from parents or guardians the School may include the contact details of parents and students in a class list and/ or School Directory.
- If you provide the School with the personal information of others, such as doctors or emergency contacts, 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 this information to third parties.
- Traffic on the School computer systems, networks and facilities will be monitored from time to time to ensure compliance with school policies governing appropriate use of the internet, email and social media.

#### FUNDRAISING OPT OUT

If you do not wish to receive any further fundraising /direct marketing communications from us, please tick the box below and return this form to us at Pulteney Grammar School, 190 South Terrace, ADELAIDE SA 5000.

I, ..... Date: .....  
(name)

- Do not wish to receive fundraising/direct marketing communications from
- Pulteney Grammar School Inc.
- Parents and Friends of Pulteney





## APPENDIX 2:

### Pulteney Old Scholars' Association Collection Notice

1. The Pulteney Old Scholars' Association (the Association) may collect personal information about you from time to time. The primary purpose for collecting this information is to enable us to inform you about our activities and the activities of Pulteney Grammar School (the School) and to keep alumni members informed about other members.
2. The information referred to above will enable us to continue to provide membership services to you.
3. 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 the School to assist in its fundraising activities. Please advise us in writing if you do not agree to this either now or in the future, by using the Opt Out election below.
4. The Association may publish details about you in our magazine, on our Facebook page or on the School's website. Please advise us in writing if you do not agree to this either now or in the future.
5. The Association's Privacy Policy, which can be found on the Association's website, contains details on how you may seek access to personal information collected about you, how you may complain about any perceived breach of the Australian Privacy Principles and how the Association will deal with such a complaint.
6. The Association and/ or the School may store personal information in the 'cloud', which means that it resides on servers that may be situated outside Australia.
7. If you provide personal information to us about other people, we encourage you to inform them of the above matters.

### FUNDRAISING OPT OUT

If you do not wish to receive any further fundraising /direct marketing communications from us, please tick the box below and return this form to us at Pulteney Grammar School, 190 South Terrace, ADELAIDE SA 5000.

I, ..... Date: .....  
(name)

- Do not wish to receive fundraising/direct marketing communications from  
 Pulteney Old Scholars Association Inc.



## PUBLICATION OF PHOTOS OPT OUT

If you do not wish your photograph to be used in fundraising, promotional, direct marketing or media communications from us, please tick the box below and return this form to us at Pulteney Grammar School, 190 South Terrace, ADELAIDE SA 5000.

I, .....  
(name)

Date: .....

- Do not authorise the use of my photograph in any publication or communication from Pulteney Old Scholars Association Inc



## APPENDIX 3:

### Employment Collection Notice

1. In applying for this position you will be providing Pulteney Grammar School (the School) with personal information.
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, which can be found on the Pulteney website [www.pulteney.sa.edu.au](http://www.pulteney.sa.edu.au) contains details on how you may complain about any perceived breach of the APPs or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
4. We will not disclose this information to a third party without your consent.
5. The School may store personal information in the 'cloud', which means that it resides on servers that may be situated outside Australia.
6. 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.
7. Contact details for the School are as follows:

Pulteney Grammar School  
190 South Terrace, Adelaide SA 5000  
Phone: 8216 5502



## **APPENDIX 4:**

### **Contractor / Board Member/ Volunteer Collection Notice**

1. In applying to provide services to the School, you will be providing Pulteney Grammar School with personal information.
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. We may also make notes and prepare a confidential report in respect of your application.
3. The School's Privacy Policy, which can be found on the Pulteney website [www.pulteney.sa.edu.au](http://www.pulteney.sa.edu.au) contains details on how you may seek access to personal information collected about you, how you may complain about any perceived breach of the Australian Privacy Principles and how the School will deal with such a complaint.
4. We will not disclose this information to a third party without your consent.
5. The School may store personal information in the 'cloud', which means that it resides on servers that may be situated outside Australia.
6. 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.
7. Contact details for the School are as follows:

Pulteney Grammar School  
190 South Terrace, Adelaide SA 5000  
Phone: 8216 5502

## Responsibilities

Principal	Is accountable for ensuring that appropriate and relevant policies and procedures are developed, implemented and reviewed on a regular basis.
Business Director	Delegated responsibility for ensuring that this policy is reviewed and updated, communicated to staff, and available on the School intranet.
Board	Is responsible for ratifying the policy.

## 7. Version Control

Version	Date Released	Approved By	Amendment
1	March 2003	Principal	Initial Policy created
2	April 2010	Principal	Reviewed and updated
3	Nov 2011	Board	Reviewed and updated
4	October 2015	Executive & Board	Document reviewed, updated and rewritten to include appropriate suggestions in conjunction with AISSA
5	August 2018	Executive & Board	NDB Changes reviewed and incorporated