

C13 Privacy Policy

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 the School's 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 *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**), and will collect, use and retain personal information in accordance with applicable laws.

The School may, from time to time, review and update this Privacy Policy, including 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, disclosure of, and access to, personal 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 government related identifiers
- 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:

- prospective, current and former students, parents and/or guardians before, during and after the course of a student's enrolment at the School;
- prospective, current and former employees, board members, consultants, volunteers and contractors of the School

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- all individuals who attend events and activities conducted by or at the School, whether on or off site; and
- other individuals that use facilities at the School.

By providing the School with your personal information, you authorise the personal information being collected, held, used and disclosed in accordance with this Policy. This Policy is in addition to any other applicable terms and conditions that may apply to your relationship and/or engagement with the School.

3. Definitions

In this policy:

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 – is a type of personal information that is given extra protection and must be treated with additional care. It includes any personal information 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 personal information 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 or to be 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

Depending upon the nature of your relationship with the School, the type of information the School collects and holds may include (but is not limited to):

- 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 emergency contacts), date of birth, gender, language background, nationality, and religion;
 - Parents' educational background, occupation, language and alumni status;
 - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors, counselling reports);
 - details of previous school/s, academic results and school reports;
 - conduct and complaint records, or other behaviour notes;
 - information about referrals to government welfare agencies;
 - health fund details and Medicare number;
 - financial information (e.g. bank account details or payment history for invoicing);

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- any custody arrangements or court orders, including criminal record (if relevant);
- photos and videos of School events and CCTV footage from the School's premises;
- any other personal information that may be required in order to facilitate your dealings with the School and/or to assist the School in conducting our business, providing and marketing our services and meeting our legal obligations; and
- Prospective, current and former employees, volunteers and contractors, including:
 - name, contact details (including emergency contacts), and date of birth;
 - government identifiers (e.g. drivers licence, passport, Medicare, tax file number);
 - information about your occupation, employment history, education and suitability for the role or relationship, including whether you hold any registration/licences/permits or police clearances required for the role;
 - financial information (e.g. bank account details or payment history for invoicing and payroll purposes, superannuation details);
 - medical information (e.g. details of disability and/or allergies, and medical certificates);
 - complaint and investigation reports;
 - photos and videos at School events and CCTV footage from the School's premises;
 - work emails and private emails (when using work email address) and Internet browsing history;
 - insurance information; and
- Other people who come into contact with the School (e.g. donors, attendees at events, hirers of School facilities):
 - name and contact details;
 - details about the products and services provided to you or that you've enquired about;
 - photos and videos of events at the School including CCTV footage;
 - testimonials (including Google reviews, complaints); and
 - any other information necessary for the particular dealings with the School.

How Personal Information is collected by the School

Personal Information you provide

The School will generally collect personal information about an individual directly from that individual by way of forms filled out by parents or students, information provided via mobile applications and software, face-to-face meetings and interviews, on-line surveys and forms, emails and telephone calls or enquiries, school programs, supply agreements, staff recruitment, facility hiring agreements.

Personal Information provided by others

In some circumstances the School may collect personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school. We may also collect personal information from CCTV cameras that may be placed on and around the School's premises.

If you have provided the School with information about another person, you warrant that you have that person's permission to do so. Your obligations under the Privacy Act may also mean that you need to tell that person about the disclosure and let them know that they have a right to access their personal information and that we will handle their personal information in accordance with this Policy.

Use of Personal Information You Provide

The School will collect, hold, 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, to which you have consented or as otherwise permitted or required by law.

In relation to personal information of students and Parents specifically, the School's primary purpose of collection is to enable the School to provide schooling for the students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School. 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 and collects personal information otherwise include:

- to provide goods and services to you and keep you informed;
- to satisfy the School's legal obligations, including reporting obligations and to allow the School to discharge its duty of care;
- looking after students' educational, social and medical wellbeing
- to provide information (including marketing information) about the School;
- to conduct activities with affiliated school organisations (e.g. The Pulteney Old Scholars' Association; Parents and Friends of Pulteney);
- day-to-day administration of the School
- fundraising and funding purposes (including seeking donations for the School);
- administering the individual's contract, as the case may be

- to respond to any feedback, queries or complaints;
 - to assess suitability of potential employees or contractors;
 - to ensure health and safety on our premises;
 - to assess performance of current employees or contractors;
 - to provide information to third parties for educational, administrative and support purposes;
 - for insurance purposes.

In addition, CCTV footage specifically may be used for the following purposes:

- detecting and deterring unauthorised access to, and criminal behaviour on, our premises;
- monitoring the safety and security of our students, employees and contractors, and completing incident investigations; and
- reviewing the actions of our employees and contractors.

You are not required to provide the School with your personal information. However, in some cases, if personal information we request is not provided, it may affect our ability to provide services, including that:

- 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; or
- if you are an applicant for employment or a contractor, we may not be able to process your application for a position or engagement at the School.

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If you do not want the School to contact you for fundraising or direct marketing purposes, you can withdraw your consent and let the School know at any time by completing and returning the opt out form, unsubscribing from the mailing list by clicking on the link in the marketing communication or contacting the Marketing and Communications Office (at the contact details below).

Marketing & Communications Office
Pulteney Grammar School
190 South Terrace
Adelaide SA 5000
(08) 8216 5555
info@pulteney.sa.edu.au

Disclosure of Personal Information

The School may disclose your personal information for the purpose for which it was collected (or a related secondary purpose), including for educational, administrative and support purposes, and otherwise where permitted or required by law or with your consent.

Some of the recipients we may disclose your personal information to include

- other schools and teachers at those schools;
- government departments (including for policy and funding purposes);
- medical practitioners and other health care providers;
- people providing educational, support and health services to the School, including specialist visiting teachers, 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);
- government agencies and organisations to whom the School is required to disclose personal information for education, funding and research purposes;
- people providing administrative and financial services to the School;
- recipients of School publications, such as newsletters and magazines;
- students, parents or guardians.

The School uses 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.

Offshore disclosure

As at the date of this Policy, the School is only likely to disclose personal information to our related entities and third parties located in Australia. We will take reasonable measures to ensure that any cross-border disclosure is in compliance with the requirements of the Privacy Act.

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 services relating to email, instant messaging and

education and assessment applications. 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 be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

Management and Security of Personal Information

All School staff members, volunteers, contractors and other relevant individuals are required to respect the confidentiality of personal information and the privacy of individuals.

The School takes active steps to protect the personal information it holds from misuse, interference, loss and unauthorised access, modification or disclosure by use of various technical and physical security measures, including locked storage of paper records, data encryption and restricting access to electronic records through technical access restrictions.

Access and Correction of Personal Information

Under the Privacy Act, an individual has the right to access personal information that the School holds about them and request correction if the personal information is not accurate, complete or up to date.

To make a request to access any personal information the School holds about you or your child, please contact the Privacy Officer (details below). In processing your request, we will comply with our obligations under the Privacy Laws, noting that we may need to verify your identity before we allow you to access your personal information, and are permitted to withhold the disclosure of personal information in prescribed circumstances. If we cannot provide you with access to that the requested information, we will provide you with written notice explaining the reasons for refusal. The School may charge an administrative 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 you believe the personal information we hold about you is inaccurate, incomplete or out of date, please contact our Privacy Officer. If you satisfy the School that any personal information we hold about you is not accurate, complete or up-to-date, we will amend our records accordingly. **You may also update your details from time to time through the School's online systems, include the Parent Portal.**

The School will respond to all requests for access or correction within a reasonable time, in accordance with the School's Privacy Framework and the Privacy Act.

The School may, at its discretion, on the request of a student grant that student access to personal 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, and will be considered on a case by case basis.

How to contact the School

If you would like further information about the way the School manages the personal information it holds, or are unhappy with how we've handled your or your child's personal information, please contact the Privacy Officer using the following details.

Privacy Officer
Pulteney Grammar School
190 South Terrace
Adelaide SA 5000
(08) 8216 5555

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 the School's response you are entitled to contact the Office of the Australian Information Commissioner, by phoning 1300 363 992 or writing to the Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001 or by email to enquiries@oaic.gov.au.