



PRIVACY POLICY

1.0 Purpose

This purpose of this policy is to outline how Shelford Girls' Grammar, (SGG or the School), collects, uses and manages personal information.

SGG is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 (Privacy Act). In relation to health records, the School is also bound by the Health Privacy Principles which are contained in the Health Records Act 2001 (Vic) (Health Records Act). The legislation regulates the way schools can collect, use, keep secure and disclose personal information.

SGG may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to School operations and practices, and to make sure it remains appropriate to the changing school environment.

2.0 Scope

This policy applies to all staff, students, contractors, volunteers, parents/ guardians, visitors, external stakeholders or other members of the SGG community.

3.0 Policy

3.1 What kinds of personal information does the School collect and how does the School collect it?

The type of information SGG collects and holds includes, (but is not limited to), personal information, including health and other sensitive information, about:

a) Students and parents/guardians 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, previous school and religion;
- medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
- parents' education, occupation and language background;
- 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 numbers;
- any court orders;
- volunteering information; and
- photos and videos at SGG events.

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b) Job applicants, staff members, 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;
- medical information (e.g. details of disability and/or allergies, and medical certificates);
- VIT Registration, Working with Children Checks and insurance information;
- complaint records and investigation reports;
- leave details;
- photos and videos at School events;
- workplace surveillance information including use of CCTV, and monitoring work emails, private emails (when using work email addresses), and Internet browsing history.

c) 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.

3.2 How personal information is collected

3.2.1 Personal Information you provide

SGG's usual practice is to only collect information directly from individuals, or in relation to students' personal information, directly from students or their parents/ guardians. SGG will generally collect personal information held about an individual by way of forms filled out by individuals or parents/guardians, face-to-face meetings and interviews, emails, electronic sources such as through website forms, CareMonkey and Synergetic, and telephone calls. On occasions, people other than parents/ guardians and students provide personal information.

SGG may also receive personal information through surveillance activities such as the use of CCTV security cameras, and monitoring of computer systems, (including school email and internet use), networks and facilities. People interacting with the School, or using SGG's systems are advised that they may be monitored, and personal information may be collected.

3.2.2 Personal Information provided by other people

In some circumstances, SGG 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. On occasion, SGG may collect information from a third party or a publicly available source, but only if the individual, or parent/ guardian, consents to such collection or would reasonably expect us to collect their information from the third party, or if collection is necessary to provide educational services.

3.2.3 Exception in relation to employee records

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to SGG's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between SGG and employee. SGG handles staff health records in accordance with the Health Privacy Principles in the Health Records Act.

3.3 How will the School use the personal information you provide?

SGG 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.

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3.3.1 Students and Parents/ Guardians

In relation to personal information of students and parents/ guardians, SGG's primary purpose of collection is to enable the School to provide schooling to 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/ guardians, 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 SGG uses personal information of students and parents/guardians include:

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

In some cases, where SGG requests personal information about a student or parent/ guardian, and if the information requested is not provided, SGG may not be able to enrol or continue the enrolment of the student, or permit the student to take part in a particular activity. Importantly, SGG cannot exercise an appropriate duty of care if you do not provide information relevant to your child's care.

3.3.2 Job applicants and contractors

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

The purposes for which SGG uses personal information of job applicants and contractors include:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the School; and
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

3.3.3 Volunteers

SGG also obtains personal information about volunteers who assist the School in its' functions, or conduct associated activities, such as the Shelford Parents Association (SPA) and Shelfordians, to enable the School and the volunteers to work together.

3.3.4 Marketing and fundraising

SGG's marketing functions support the growth and development of the School, and provide you with information about events and functions at the School. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising, for example, the Shelford Parents Association, the Shelfordians, or, on occasions, external fundraising organisations.

Parents/ guardians, 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.

SGG understands that you may not wish to receive marketing materials from the School. If you would prefer not to receive such information, a request, in writing, can be made to the Business Manager.

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3.4 Who might SGG disclose personal information to and store your information with?

SGG may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools;
- 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, counsellors and outdoor education providers;
- 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/ guardians;
- any person you authorise the School to disclose information to; and
- any person to whom we are required or authorised to disclose the information to by law, including child protection laws.

3.5 Sending and storing information overseas

SGG may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange, or to arrange an overseas school trip

However, SGG 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
- being satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or other applicable privacy legislation.

For full fee paying overseas students (i.e. where the student's parents are located overseas), school reports or other personal information will be sent directly to parents. If however the parents or student require personal information to be sent to a third party overseas, an express consent will be obtained by SGG prior to the release of such information.

SGG 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 means that personal information may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Microsoft Office 365. Microsoft provides applications for education including Outlook, and stores and processes limited personal information for this purpose. School staff and the school's service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering Microsoft Office 365 and ensuring its proper use.

Where practicable, we will inform you about where your information is stored, however, SGG undertakes due diligence with respect to third party service providers who may have access to personal information,

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including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

3.6 How does SGG treat sensitive information?

In referring to 'sensitive information', SGG means: information 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, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

3.7 Management and security of personal information

SGG staff are required to respect the confidentiality of students' and parents/guardians' personal information and the privacy of individuals.

SGG has in place 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.

SGG may destroy your records in accordance with applicable laws. Personal information SGG holds that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

The School's website may also contain links to other websites. SGG does not share your personal information with those websites and is not responsible for their privacy practices. Please check their privacy policies.

3.8 Access and correction of personal information

Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information which SGG holds about them and to advise the School of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents/ guardians, 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 to update any personal information the School holds about you or your child, please contact the Business Manager by telephone or in writing. SGG may require you to verify your identity and specify what information you require. SGG 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 refusal.

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

SGG respects every parent/ guardian's right to make decisions concerning their child's education.

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

Parents/guardians may seek access to personal information held by the School about them or their child by contacting the Business Manager by telephone or in writing. However, there may be occasions when

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access is 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 to the student.

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

3.10 Reporting Breaches of Privacy

We are committed to ensuring the privacy of all personal information we collect. Certain compulsory obligations have been placed on organisations under the Privacy Act 1988 (Cth) to notify specific types of data breaches called Notifiable Data Breaches to individuals affected by the breach as well as to the Office of the Australian Information Commissioner (OAIC). A Notifiable Data Breach is one that is likely to result in serious harm to any individual to whom the information relates.

In the event of a data breach involving personal information, SGG will investigate the breach within 7 days, and will take action accordingly. It is important to be aware that not all breaches will amount to a Notifiable Data Breach. Action may include notifying the OAIC, and affected parties and providing;

- Our identity and contact details;
- A description of the data breach;
- The kinds of information that is suspected of being obtained;
- Recommendations about the steps you should take to limit the impact of the breach; and
- Advice as to whether we have contacted the OAIC about the breach.

3.11 Enquiries and Complaints

If you would like further information about the way SGG 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 Business Manager by email at bsmith@shelford.vic.edu.au, or telephone at 9524 7333. SGG 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.

4.0 References

- Commonwealth Privacy Act 1988 (Cth)
- Health Records Act 2001 (Vic)

5.0 Related Documentation

- Standard Collection Notice
- Enrolment Policy
- Records Management Policy
- Complaints and Grievances Policy
- Volunteer Policy
- Contractors and External Providers Policy
- Recruitment Policy

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