



## REDDAM HOUSE PRIVACY POLICY

2014



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## 1. PRIVACY POLICY

Reddam House is committed to following best practices in protecting your personal privacy. The following statement outlines clearly how we collect, use and protect the personal information which you provide to us.

Reddam House will only use your personal information in ways that are compatible with the Privacy Policy.

Reddam House is bound by the **Australian Privacy Principles** contained in the Commonwealth *Privacy Act 1988* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

Reddam House may, from time to time, review and update the Privacy Policy, taking account of new legislation and other changes to the School's operations and practices to ensure Reddam House Privacy Policy remains appropriate.

## 2. WHAT KINDS OF PERSONAL INFORMATION DOES REDDAM HOUSE COLLECT AND HOW DOES THE SCHOOL COLLECT IT?

Reddam House only collects information about you with your consent.

The type of information the School collects and holds includes, but is not limited to, personal information, including 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, volunteers and contractors
- other people who come into contact with the School.

### 2.1 Personal Information provided by parents or pupils

For pupils this could include: Name, preferred name, gender, date of birth (and age), place of birth, citizenship, residency, permanent address, temporary address, suburb, phone number, special needs, history of prior schools, honours received in prior schools, extra-curricular activities, birth certificate, copy visa if non-resident, final report from prior school, emergency contact numbers, medicare number, subject selection, whether Aboriginal or Torres Strait Islander, country of birth, language spoken at home, correspondence with parents, photos, accident reports and absentee notes.

Sensitive information collected could include: religion, medical background, immunisation records, asthma management plan if applicable and allergy information if applicable.

For Parents this could include: Name, address, email address, phone number, date of birth (and age), occupation, business name, type of business, business address, family referee's name, address and phone number, other children's details, donation history, highest year of schooling achieved, highest

qualification achieved, language spoken at home, passport copy, country of birth and nationality and payment of school fees financial and billing information.

Sensitive information collected could include: religion, marital status and custody details.

The School will generally collect personal information held about a student or prospective student by way of forms filled out by parents or students, face to face meetings and telephone calls. On occasions people other than parents and pupils provide personal information.

## **2.2 Exception in relation to employee records**

Under the Privacy Act and *Health Records and Information Privacy Act 2002 (NSW)*, the **Australian Privacy Principles** (and Health Privacy Principles) 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.

## **2.3 Personal Information provided by other people**

Personal information might also be collected from other people such as the Board Members, volunteers, medical professional or others, for example a report provided by a medical professional or a reference from another school.

# **3. HOW WILL THE SCHOOL USE THE PERSONAL INFORMATION PROVIDED TO IT?**

The school will use personal information it collects from persons 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 such persons, or to which they have consented.

## **3.1 Pupils and Parents**

The primary purpose of collection and use of information is to enable the School to provide schooling for its students and to keep parents informed about matters related to their child's schooling, through correspondence and newsletters.

The School will also use personal information for day-to-day administration, looking after pupils' education, social, spiritual and medical wellbeing and to satisfy the School's legal obligations and allow the School to discharge its duty of care.

If personal information requested about a pupil or parent is not obtained, the School may not be able to enrol or continue the enrolment of the student.

## **3.2 Job applicants, staff members and contractors**

In the case of information relating to applicants for positions at the School, staff members and contractors, to assess and/or engage the applicant, staff member or contractor.

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

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

### 3.3 Volunteers

The school also obtains personal information about volunteers who assist the school in its functions or conduct associated activities, such as the parents, to enable the school and the volunteers to work together.

### 3.4 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 pupils and staff thrive.

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.

## 4. WHO MIGHT THE SCHOOL DISCLOSE PERSONAL INFORMATION TO AND STORE INFORMATION WITH?

The School may disclose personal information, including sensitive information, held about an individual to:

- another school
- government departments
- medical practitioners
- people providing services to the School, including specialist visiting teachers , music tutors and sports coaches
- recipients of School publications, like newsletters and magazines
- parents
- anyone authorised to receive such information
- anyone to whom we are required to disclose the information by law.

### 4.1 Sending and storing information overseas

The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or overseas school trip.

However, the school 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
- otherwise complying with the **Australian Privacy Principles** or other applicable privacy legislation.

The school may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia. It is important that Schools are aware of the practices of the cloud provider and enter into appropriate arrangements to limit their exposure should a data

breach occur. The use of a cloud service provider by a School may trigger the requirements under APP 8. However, the Office of the Australian Information Commissioner's draft guidelines to the APPs provide that where a School provides personal information to a cloud service provider located overseas, the provision of the information will be a 'use' and not a 'disclosure' (and therefore APP 8 will not apply) where:

- the information is provided for the limited purpose of storing and managing the information;
- the contract between the School and the overseas cloud service provider binds the provider not to use or disclose the personal information except for the limited purpose of storing and managing the information;
- the contract requires any sub-contractors to agree to the same obligations; and
- the contract between the School and the cloud service provider gives the entity effective control of the information.

## **5. HOW DOES THE SCHOOL TREAT SENSITIVE INFORMATION?**

In referring to 'sensitive information', the school 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 the provider agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

## **6. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION**

The School's staff is required to respect the confidentiality of students', parents' and staff members' personal information.

The school 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.

## **7. ACCESS AND CORRECTION OF PERSONAL INFORMATION**

Under the Commonwealth Privacy Act (and the Health Records 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. Pupils will generally be able to access and update their personal information through their parents, but older pupils 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 yourself as a parent or your child, please contact the Privacy Officer in writing. The school may require you to

verify your identity and specify what information you require. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

## **8. CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF PUPILS**

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 pupil to the pupil's parents. The school will treat consent given by parents as consent given on behalf of the pupil, and notice to parents will act as notice given to the pupil.

As mentioned above, parents 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. Such occasions would include where release of the information would have 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 pupil.

The school may, at its discretion, on the request of a pupil grant that pupil access to information held by the school about them, or allow a pupil 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 pupil and/or the pupil's personal circumstances so warranted.

## **9. ENQUIRIES AND COMPLAINTS**

If you would like further information about the way Reddam House 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. The school will investigate any complaint and will notify you of the making of a decision in relation to your complaint. Please allow a reasonable time (usually 30 days) to respond to your request.

If you require a hard copy of this Privacy Policy please email our Privacy Officer at [privacy.officer@reddamhouse.com.au](mailto:privacy.officer@reddamhouse.com.au) to request a copy to be sent to you.

**10. ACKNOWLEDGEMENT BY STAFF**

**PRIVACY POLICY**

This page is to be completed, removed from the document and returned to the office of the Privacy Officer. If you have any concerns or questions regarding the document please seek advice from the Privacy Officer.

Name: .....

Department: .....

I acknowledge that I have read this **Privacy Policy** and I understand my role in any procedures. I acknowledge that I have a duty of care to all people present at the School, particularly the students, and will follow all directions to help ensure the welfare of all.

Signed: .....

Date: .....