



POLICY

NAME: Privacy Policy
February 2020

UPDATE DUE: February 2021, or more often as circumstances require

COMMITMENT TO CHILD SAFETY

All students who attend Camberwell Girls Grammar School (CGGS) have a right to feel and to be safe. The wellbeing and safety of all students in our care is our first priority and we have zero tolerance to child abuse. The protection of students is the responsibility of everyone who is employed at, or is engaged by CGGS in child-connected work. To ensure the safety and best interests of all students, we take into account the needs of those with an Aboriginal or Torres Strait Islander heritage, those from culturally and/or linguistically diverse backgrounds and those with a disability.

PRIVACY POLICY

Camberwell Girls' Grammar School (CGGS) is bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988 (Cth.) (Privacy Act)* and the Health Privacy Principles (**HPPs**) contained in the *Health Records Act 2001 (Vic) (Health Records Act)*.

The APPs are designed to protect the privacy of individuals by regulating the way **personal** information is handled, managed and used at the School.

The HPPs are designed to protect the privacy of individuals by regulating the way **health** information is handled, managed and used at the School.

The purpose of this policy is to outline how the School handles, uses and manages personal and health information.

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.

DEFINITIONS

Personal information	Information that identifies an individual or allows an individual to be identified
Sensitive Information	A subset of personal information. Information about an individual's racial or ethnic origin, political opinions, professional or political or religious affiliations or memberships, sexual orientation or practices, criminal record, health, genetics and/or biometrics.
Health Information	A subset of sensitive information. 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, currently or in the future, to an individual that is also personal information.

WHAT INFORMATION IS COLLECTED BY CGGS?

CGGS will only collect personal information (including sensitive and health information) that is reasonably necessary for, or directly related to the School's activities or functions, or to which consent has been obtained.

Depending on the circumstances, the School may collect personal information from a person in their capacity as a student, parent, staff member, contractor, consultant, volunteer, customer, supplier, job applicant, alumni, visitor or anyone else that comes into contact with the School.

Such personal information may include, but is not limited to the following:

- Full name
- Address
- Contact details, including telephone numbers and email addresses
- Photograph
- Date of birth
- Gender
- Academic results / records
- Bank account details
- Visa status
- Emergency contact details
- Next of kin details
- Occupation
- Marital status
- Residency status
- Qualifications

Such sensitive information may include, but is not limited to the following:

- Government identifiers such as TFN
- Nationality
- Country of birth
- Professional memberships
- Family court orders
- Criminal records
- Religious beliefs

Such health information may include, but is not limited to the following:

- Medical records
- Disabilities
- Immunisation records
- Allergens

Exception in relation to employee records:

Personal information that is collected for the purpose of administering an individual's employment and that is held in an employee's personnel file is exempt from the Privacy Act. Examples of this type of information include the terms and conditions of employment, personal contact details, performance and conduct, salary, termination and trade union membership.

HOW IS INFORMATION COLLECTED BY CGGS?

CGGS may collect personal information in the following ways:

Personal information provided by the individual: By way of forms filled out by individuals (including online registrations), face to face meetings, interviews, emails and telephone calls.

Personal information provided by other people: from third party disclosures, such as a report provided by a medical professional or a reference from another school.

HOW DOES CGGS USE PERSONAL INFORMATION?

CGGS will only use personal information it collects for the primary purpose of that collection, and for such other secondary purposes that are related to the primary purpose of that collection and are reasonably expected by the individual or to which the individual has consented.

Students and parents

In relation to personal information of students and parents, CGGS's primary purpose of collection is to enable the School to provide schooling for the student, exercise its duty of care and perform administrative functions.

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

- To keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- Day to day administration;
- 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 CGGS requests personal information about a student or parent, if the information requested is not obtained, the School may not be able to enrol or continue the enrolment of the student.

CGGS will only use or disclose sensitive or health information for a secondary purpose if it is reasonably expected to use or disclose the information and the secondary purpose is directly related to the primary purpose, e.g. in the case of a medical emergency.

Job applicants, staff members and contractors

In relation to personal information of job applicants, staff members and contractors, CGGS'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 personal information of job applicants, staff members and contractors include:

- Administering the individual's employment or contract, as the case may be;
- For insurance purposes;
- Seeking funds and marketing for the School; and
- To satisfy the School's legal requirements (e.g. child protection legislation)

Volunteers

CGGS also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as Old Grammarians Association, to enable the School and the volunteers to work together.

Marketing and fundraising

CGGS treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring the School continues to meet its vision – to be *'a leader and innovator in the education of girls, dedicated to fostering a passion for learning and building a more just and sustainable world.'* Personal information held by the School may be disclosed to an internal organisation that assists in the School's fundraising, for example the Camberwell Girls Grammar School Foundation.

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, such as newsletters and magazines, which include personal information, may be used for marketing purposes.

DISCLOSURE OF PERSONAL INFORMATION

CGGS may disclose personal information held about an individual to:

- Another school;
- Government departments and education authorities;
- Medical practitioners;
- Assessment and education authorities, such as ACARA and NAPLAN
- People providing services to the School, including specialist visiting teachers and sports coaches;
- Recipients of School publications, such as newsletters and magazines;
- Parents;
- Anyone else the individual authorises the School to disclose information to
- Anyone else to whom the School is required or authorised to disclose the information by law (e.g. child protection laws)
- Prevent or lessen a serious and imminent threat to somebody's life or death

In certain circumstances, CGGS may share de-personalised aggregated data with third parties to meet its commitments as a service provider to its students. Nothing in this privacy policy prevents the School from using and disclosing de-personalised aggregated data to others.

Sending and storing personal information overseas

From time to time, for the purpose of carrying out CGGS's functions and activities, the School may need to disclose personal information to third parties who are located in countries outside of Australia (overseas recipient), for instance, to facilitate a school exchange, to administer International Student Program (CRICOS 00141J) or information may be stored with a cloud service provider who may store data outside of Australia. CGGS will make all reasonable attempts to disclose this information to individuals and if reasonably possible, seek the individual's consent, prior to proceeding.

STORAGE AND SECURITY OF PERSONAL INFORMATION

All staff at CGGS are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

The School stores personal information in a variety of formats including, but not limited to:

- Network server and databases
- Hard copy files
- Soft copy files
- Personal electronic devices such as smartphones, laptops and tablets
- Third party storage providers such as cloud storage facilities

CGGS takes all reasonable steps to protect the personal information the School holds from misuse, interference, loss, unauthorised access, modification or disclosure. Some measures the School has in place to protect the integrity of personal information include:

- Locked storage of paper records
- Password protected access to systems and information
- Segregated user access to information across all IT systems

Personal information will be retained for only as long as it is needed (including for archival purposes) and it will then be disposed of lawfully and securely.

UPDATING PERSONAL INFORMATION

The School endeavours to ensure that the personal information it holds is accurate, relevant, complete and up to date. A person may update their personal information by logging into their personal school account online ('Parent Lounge') or by contacting the School. The School takes the necessary steps to verify the requesting individual's identification before granting access.

If the School becomes aware that the personal information is incorrect or out of date, it will take reasonable steps to rectify the data.

ACCESS TO PERSONAL INFORMATION

Under the Commonwealth Privacy Act and Health Records Act, an individual has the right to request access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy.

Parents may seek access to personal information held by the School about them or their child by contacting the Principal. However, there are some occasions where access may be 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. This would normally be done only when the student involved had reached 18 years of age, but the School could do so in other circumstances when the maturity of the student and/or the student's personal circumstances so warranted.

The School takes the necessary steps to verify the requesting individual's identification before disclosing any personal information.

RESPONDING TO DATA BREACHES

The Notifiable Data Breach Scheme (NDBS) requires CGGS to notify individuals when their personal information is involved in a data breach that is likely to result in serious harm. The School has in place a Notifiable Data Breach Policy and will take appropriate, prompt action if it has reasonable grounds to believe that a serious data breach has occurred. This may involve review of the School's internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If the School is unable to notify affected individuals or when it is impractical to do so, the School will publish a statement on its website.

BREACH OF AUSTRALIAN PRIVACY PRINCIPLES

If a person believes the School has breached its obligations under the Australian Privacy Principles or Health Privacy Principles or wishes to make a complaint about how the School manages personal information, that person should forward a complaint in writing to the Chief Financial & Operating Officer. The complaint should include sufficient details of the alleged breach or concern. The School will respond to that person within a reasonable time after receipt of the complaint. In responding to that person, the School will determine the validity of the concern or whether a breach has occurred and, if so, the appropriate response in light of the circumstances.

If the person does not believe the complaint was adequately dealt with by the School, that person may make a further complaint to the Privacy Commissioner and seek advice regarding any such complaint from the Privacy Hotline on 1300 363 992 or enquiries@oaic.gov.au. Information is also available on the Commonwealth Government Office of the Australian Information Commissioners website at <http://www.oaic.gov.au>.

Once referred to the Privacy Commissioner, the complaint will be dealt with by way of conciliation. If a resolution cannot be reached, the Privacy Commissioner may make a determination which is binding on the parties and enforceable at law.

A person wishing to make a complaint should first attempt to resolve any complaint with the School directly before referring the complaint to the Privacy Commissioner.

CONSENT

The School respects every parent's right to make decisions concerning their child's education.

Generally, the School will refer any request 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.

ENQUIRIES

The School can be contacted about this Privacy Policy by:

- Email: camgram@cggs.vic.edu.au
- Phone: +61 3 9813 1166
- Post: 2 Torrington Street, Canterbury, Victoria 3126

POLICY REVIEW

CGGS is committed to the continuous improvement of its policies and procedures.

Unless otherwise stated, this policy remains in place until it is superseded by an amended version.

This policy will be reviewed annually or more often as circumstances require.

Next scheduled review date is February 2021.

VERSION CONTROL

Version No.	Date Approved	Author	Comments
1.0	March 2014	-	Initial version
2.0	05.02.2019	Phong Pham	New template with new header Added section 'Responding to Data Breach' Added reference to use of cloud storage Added a 'definitions' section Added reference to HPPs Added version control table
3.0	21.02.2020	Phong Pham	Added Policy Review section