

PRIVACY POLICY

This Privacy Policy details how we protect your privacy and how the School complies with the requirements of the *Federal Government's Privacy Act* and its 13 Australian Privacy Principles. This policy also describes:

- who the School collects information from;
- the types of personal information collected and held by us;
- how this information is collected and held;
- the purposes for which your personal information is collected, held, used and disclosed;
- how you can gain access to your personal information and seek its correction;
- how you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled;
- whether the School is likely to disclose your personal information to any overseas recipients.

Who does the School collect Personal Information from?

The School collects varied personal information from students, parents, prospective parents, job applicants, staff, volunteers and others including alumni, contractors, visitors and others that are involved with the School from time to time. Please note that employee records are not covered by the Australian Privacy Principles where they relate to current or former employment relations between the School and the employee.

What kinds of Personal Information does the School collect?

The kinds of personal information the School collects is largely dependent upon whose information we are collecting and why we are collecting it. However, in general terms the School does collect:

- **Personal Information** including names, addresses and other contact details; dates of birth; next of kin details; financial information, photographic images, attendance records and related matters.
- **Sensitive Information** (particularly in relation to student and parent records) including religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, professional or union memberships, Family Court orders, criminal records and related matters.
- **Health Information** (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements, and related matters.

How does the School collect your Personal Information?

How the School collects personal information is dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

Where possible the School has attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form, a Parent Consent Health and Emergency Form, etc.). However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face to face meetings, through financial transactions or email monitoring.

We may also collect personal information from other people (e.g. a personal reference) or independent sources (e.g. a telephone directory); however, we will only do so where it is not reasonable and practical to directly collect the information from you.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information”. Where we collect unsolicited information we will only hold, use and/or disclose that information if we could have collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate.

How does the School use Personal Information?

The School uses personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented. Our primary uses of personal information include, but are not limited to:

- providing education, pastoral care, extra-curricular and health services;
- satisfying our legal obligations including our duty of care and child protection obligations;
- keeping parents informed on School community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;
- supporting the activities of School associations such as the Parents & Friends Association, School Alumni Association;
- supporting community based causes and activities, charities and other causes in connection with the School's functions or activities;
- helping us to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis;
- School administration, including insurance purposes;
- the employment of staff;
- the engagement of volunteers.

The School only collects sensitive information that is reasonably required for one or more of these functions or activities, if we have the consent of the individuals to whom the sensitive information relates or if the collection is necessary to lessen or prevent a serious threat to life, health or safety, or another permitted general situation (such as locating a missing person) or permitted health situation (such as the collection of health information to provide a health service) exists.

If we do not have the relevant consent and a permitted health situation or permitted general situation does not exist, then we may still collect sensitive information provided it relates solely to individuals who have regular contact with the School in connection with our activities. These individuals may include students, parents, volunteers, former students and other individuals with whom the School has regular contact.

The School will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

Storage and Security of Personal Information

The School stores personal information in a variety of formats including databases, hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is of great importance to us and the School takes all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on the School databases on a 'need to know' basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring that where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a 'need to know' basis.
- Implementing physical security measures around the School buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regimen.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

The School's website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

When the School discloses Personal Information

The School only uses personal information for the purposes for which it was given to us, or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities. The School may disclose your personal information to government agencies, other parents, other Schools, recipients of School publications, visiting teachers, counsellors and coaches, our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation or permitted health situation exception applies; and / or
- disclosure is reasonably necessary for a law enforcement related activity.

Personal Information of Students

The Privacy Act does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information.

The School takes a common sense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students and we will treat consents provided by parents/carers as consents provided by a student.

The School is, however, cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older students and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents directly from students. We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the School's duty of care to the student.

Disclosure of Personal Information to overseas recipients

The School may disclose personal information about an individual to overseas recipients in certain circumstances, such as when we are organising an overseas excursion, facilitating a student exchange, or storing information with a "cloud computing service" which stores data outside of Australia. The School will, however, take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- We have the individual's consent (which may be implied); or
- We have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- We form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- We are taking appropriate action in relation to suspected unlawful activity or serious misconduct

How the School ensures the quality of your Personal Information

The School takes all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis the School maintains and updates personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

How to gain access to your Personal Information the School holds

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.

If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

Complaints about the handling of Privacy Information

If you wish to make a complaint about a breach by us of the Australian Privacy Principles you may do so by providing your written complaint by email, letter, facsimile or by personal delivery to any one of our contact details as noted below. You may also make a complaint verbally.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

How to Contact Us

You can contact us about this Policy or about your personal information by:

- Emailing HR@petermoyes.wa.edu.au
- Calling (08) 9304 5500
- Writing to our Privacy Officer at P.O. Box 240 Quinns Rocks WA 6030 or by facsimile at (08) 9304 5599

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

Changes to our privacy and information handling practices

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website <http://www.petermoyes.wa.edu.au> regularly for any changes.