Privacy Statement to All Parents and Students

COLLECTION OF PERSONAL INFORMATION

1. **Policy**

This Privacy Policy applies to personal information collected by Townsville Grammar School (herein referred to as 'we', 'our', 'us', the 'School' and 'Townsville Grammar') and this Policy sets out the practices, procedures and systems Townsville Grammar use to manage your personal information.

2. **Kinds Of Personal Information We Collect**

This Policy ensures that we comply with the Australian Privacy Principles (APPs) and the *Privacy Act 1988* as well as the requirements including public health and child protection laws. Townsville Grammar collects personal information, including sensitive personal information about students and parents or guardians before and during the course of a student's enrolment at the School. Townsville Grammar collects personal information from students, parents, prospective parents, guardians, job applicants, staff, volunteers and others including alumni, contractors, visitors and other third parties that come in contact with Townsville Grammar.

The kinds of personal information we collect is largely dependent upon whose information we are collecting and why we are collecting it. However in general terms Townsville Grammar may collect:

(a) Personal information including names, addresses and other contact details, dates of birth, next of kin details, financial information, photographic images and attendance records;

(b) Sensitive information including religious beliefs, government identifiers, nationality, country of birth, languages spoken (at home), professional or union memberships, Family Court Orders, criminal records, health information, racial or ethnic origins, political opinions. Unless it is agreed or otherwise allowed by law Townsville Grammar School will not disclose sensitive personal information for any other reason except for the purpose for which it was provided or a directly related secondary purpose.

Townsville Grammar only collects such personal information that it requires to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care to students.

3. **How We Collect Your Information**

Townsville Grammar will collect personal information about an individual by ways of application forms (and other forms completed by the individual), face to face meetings and discussions, interviews, telephone calls and other communications. In some circumstances Townsville Grammar may be provided personal information about an individual from third parties (for example, a report provided by a Medical Professional or a reference from a previous school).

Townsville Grammar will only use personal information for the primary purpose or related secondary purpose for which it was collected.

4. **How We Use Personal Information**

We only use personal information for one or more of our function or activities or for a related secondary purpose that would reasonably be expected by you or to which you have consented.

Our main purpose for collecting, holding, using and disclosing personal information include the following:

(a) to provide education, pastoral care and health services;

(b) to satisfy our legal obligations including our duty of care to students and child protection obligations;

(c) to keep parents informed as to School community matters through correspondence, newsletters and magazines;

(d) in our marketing, promotional and fundraising activities;

(e) in our support of activities of Townsville Grammar and its associations such as the Parents Network and Past Grammarians Association and previous attendees Clubs;

(f) supporting activities of the Townsville Grammar School;

(g) supporting community based courses and activities, charities and other courses in connection with Townsville Grammar's functions or activities;

(h) helping Townsville Grammar to improve day to day operations including staff training, systems development, developing new programs and services, undertaking planning and statistical analysis;

(i) school administration including insurance purposes;

(j) employment of staff; and

(k) engagement of volunteers.

We only collect sensitive personal information reasonably necessary for one or more of the above functions or activities or if we have consent of the individual to whom the sensitive personal 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 health situation (such as the collection of health information to provide a health service) exists.

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

5. **Security of Personal Information**

We take reasonable steps to keep your personal information accurate, up to date and complete and to protect it from misuse, interference and loss or unauthorized access, modification or disclosure. Our staff must be aware of and comply with their obligations in relation to handling of personal information.

We store personal information in a variety of formats including on data bases, in hard copy files, on personal devices (such as laptops, mobile phones, cameras and other recording devices).

The School has in place procedures to protect personal information that Townsville Grammar School holds from misuse, loss, unauthorized access, modification or disclosure by use of various methods including locked storage of physical paper records and password protected access rights to computerized records, restricting access on a 'need to know' basis, ensuring different levels of security allocated to different staff based on their roles, ensuring all staff are aware not to reveal or share passwords, restricting the physical files of sensitive and health information by locking in lockable filing cabinets and/or lockable rooms and by having physical security measures around School buildings.

6 **Sending Information Overseas**.

Townsville Grammar may disclosure personal information about an individual to overseas recipients, for instance when storing personal information in the "Cloud" service providers that may be situated outside of Australia or when facilitating a school exchange. Townsville Grammar has taken reasonable steps to ensure that the recipient does not breach the Privacy Act 1988 or the AAPs or the recipient is subject to an information privacy scheme similar to the Privacy Act 1988 or you have consented to the disclosure.

7. **Use or Disclosure of Government Related Identifiers**

The School will not disclose a government related identifier of an individual unless an exception under the APPs applies.

If Townsville Grammar no longer uses information we will destroy and de-identify the information in accordance with the APPs.

8. **Direct Marketing and Fundraising**

Townsville Grammar treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that Townsville Grammar continues to provide a quality learning environment in which both students and staff thrive.

Personal information held by Townsville Grammar may be disclosed to organizations that assist in Townsville Grammar's Fundraising (for example alumni organisations). We will not disclose your personal information to third parties for their own marketing purposes without your consent.

Parties that deal with Townsville Grammar (such as parents, staff, contractors) may from time to time receive fundraising information. School publications, such as newsletters and magazines that include personal information may be used for marketing purposes. If you do not agree to this, please advise Townsville Grammar in writing to the Privacy Officer.

Should we receive unsolicited personal information we will determine whether we could have obtained that information under AAPs and if not we will destroy the information (if it is lawful and reasonable for us to do so) or we will de-identify the information.

9. **Access To Your Personal Information**

Townsville Grammar takes all reasonable steps to ensure that the personal information we hold, use or disclose is accurate, up to date and complete. 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 we maintain and update personal information.

You may request access to the personal information we hold about you or request that we change personal information we hold about you by advising Townsville Grammar of any update or changes that may be required. 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.

If we do not provide you with access to your personal information or we do not amend your personal information as requested, we will notify you of the reasons why. Where appropriate we will provide you with the reasons for our decisions and, 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 records.

To make a request please write to:

The Privacy Officer;

Townsville Grammar School

45 Paxton Street

North Ward Qld 4810

Townsville Grammar may require applicants to verify their identity and specify what information is required. We may charge a fee to cover the costs of verifying an application and locating, reviewing, copying any material requested. If the information sought is extensive, Townsville Grammar will advise you of the likely costs in advance.

Note: There may be occasions when access is denied such as where the release of information would have unreasonable impacts on the privacy of others or where the release may result in a breach of the School's duty of care to a student. Where there is disagreement about the accuracy, completeness or otherwise of personal information and an individual asks Townsville Grammar to provide a statement claiming the information is not accurate, Townsville Grammar must take reasonable steps to do so.

10. **Unanimity and Pseudonym**

We do not give you the option to deal with us under a pseudonym as it is not practical for you to deal with us under a pseudonym.

11. **Enquiries and Complaints**

Further information about the way we manage and hold your personal information can be obtained by contacting the Privacy Officer. Complaints involving an alleged breach of the APPs by Townsville Grammar should be presented in writing to the Privacy Officer. Townsville Grammar will investigate any complaint and will notify you of the decision in relation to the complaint as soon as practicable after it has been made.

Should you have any queries, the School's Privacy Officer is the Director of Enrolments, Mrs Kristell Scott.