

# PRIVACY POLICY

# Your privacy is important

This statement outlines Townsville Grammar School's policy on how the School uses and manages personal information provided to or collected by it.

The School is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth *Privacy Act* (1988), (the Legislation).

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.

## What kind of personal information does the School collect?

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

- pupils and parents and/or guardians ('Parents') before, during and after the course of a pupil's enrolment at the School;
- job applicants, staff members, volunteers and contractors; and
- other people who may, from time to time come into contact with the School.

# How does the School collect personal information?

**Personal Information you provide:** The School will generally collect personal information held about an individual by way of forms filled out, face-to-face meetings and interviews, telephone calls and other (sometimes electronic) communications. On occasion people other than Parents, pupils and staff may provide personal information.

**Personal Information provided by other people:** In some circumstances the School 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 or organisation.

The information is collected and managed in accordance with the Legislation. Any unsolicited information will be dealt with in accordance with the APPs.

# Exception in relation to employee records

Under the Legislation, the APPs 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 an employee.

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

The School 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 as reasonably expected or to which you have consented.

**Pupils and Parents**: In relation to personal information of pupils and Parents, the School's primary purpose of collection is to enable the School to provide schooling and education for the pupil. This includes satisfying both the needs of Parents and the needs of the pupil throughout the whole period the pupil is enrolled at the School.

The purposes for which the School uses personal information of pupils 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 pupils' educational, social and medical well-being;
- seeking donations and marketing for the School;
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

In some cases where the School requests personal information about a pupil or Parent, and the information requested is not obtained, the School may not be able to enrol or continue the enrolment of the pupil, or permit the pupil to take part in a particular activity.

**Job applicants, staff members and contractors:** In relation to personal information of job applicants, staff members and contractors, the School'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 includes but is not limited to:

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

**Volunteers:** The School also obtains personal information about volunteers who assist the School in its functions or to conduct associated activities, such as Past Grammarians Association, Parents Network and Black & Gold Supporters etc., to enable the School and the volunteers to work together.

**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 be a quality learning environment in which both pupils and staff thrive. Personal information held by the School may be disclosed to an Organisation that assists in the School's fundraising, for example, the School's Foundation or alumni organisation.

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. If you do not agree to this, please advise Townsville Grammar School in writing to the Privacy Officer.

# Who might the School disclose personal information to?

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 and sports coaches;
- recipients of School publications, like newsletters and magazines; and
- anyone you authorise the School to disclose information to;
- anyone who we are required to by law.

#### 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, sexual preferences or criminal record that is also personal information; and health 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.

## Sending information overseas

There may be circumstances where some information collected by the School is sent overseas either by the direct provision of information or by storage on a 'cloud' type platform where a server may be located overseas, the cloud supplier is located overseas or the information is accessed by someone overseas. Before sending information overseas the School will:

- obtain the consent of the individual (in some cases this consent will be implied); and
- comply with the APPs to the extent required by law.

APP 8.1 requires the School to take steps that are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs.

However, in circumstances where the School has received consent to send information overseas APP 8.2 (b) provides that the School is required to inform you that it is no longer required to comply with the requirements of APP 8.1. This Privacy Policy is intended as a notice in this respect. If you have any concerns about this matter please contact the Privacy Officer to discuss.

# Management and security of personal information

The School's staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

The School has in place steps to protect the personal information the School holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and pass-worded access rights to computerised records.

#### **Access to Personal Information**

You may request access to the personal information we hold about you. Upon request, the School must give you access to this information. However, there may be occasions where the School cannot allow access to personal information, including, but not limited to, where giving access would result in a breach of the School's duty of care to a student, or where giving access would have an unreasonable impact on the privacy of others. Should the School refuse to give access to the personal information, the Privacy Officer must provide you with a written notice that explains the reasons for the refusal (except where it would be unreasonable to do so) and the mechanisms available to complain about the refusal.

Upon receiving a request to access personal information, the School must respond within a reasonable period once the request is made. The School may require you to verify your identity and specify what information you require. The School may also charge a fee to cover the costs of locating, retrieving, reviewing and reproducing the information. The School will advise you of these costs in advance.

#### **Updating Personal Information**

The School takes reasonable steps to ensure your personal information is accurate, up to date, complete, relevant and not misleading. Should you become aware that information the School holds is inaccurate, out of date, incomplete, irrelevant or misleading, you may request that the School correct the personal information. The School will respond in a timely manner to the request to correct personal information. Please advise the School if any of the personal information you have provided has changed.

### **Enquiries and Complaints**

Further information about how the School handles and manages personal information, or to make a complaint, please contact:

The Deputy Principal Townsville Grammar School 45 Paxton Street North Ward QLD 4810

Reviewed February 2018