



## Privacy Policy

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

The School is bound by the National Privacy Principles contained in the *Commonwealth Privacy Act*. The School will, 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 and how does the School collect it?**

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.

### **Personal Information provided by the person**

The School will generally collect personal information about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, and telephone calls. On occasion people other than Parents and students provide personal information.

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

In some circumstances the School may be provided with personal information about an individual by a third party; for example, from referees or from a report provided by a medical professional.

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

Under the *Commonwealth Privacy Act* the National Privacy Principles do not apply to an employee record. As a result, this 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.

### **How will the School use personal information?**

The primary purpose of collection and use of information is to enable the School to provide schooling and pastoral care for its students and, 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 School will also use personal information for such secondary purposes that are related to the primary purpose of collection; for example, the medical information obtained will only be used for proper medical and associated purposes.

### **Students and Parents:**

In relation to personal information about students and parents, the School's primary purpose of collection is to enable the School to provide schooling for the student. This includes satisfying both the needs of Parents and the needs of the student throughout the whole period of enrolment at the School.

The purposes for which the School uses personal information about students and Parents include:

- keeping Parents informed about matters related to their child's schooling
- correspondence, newsletters and magazines
- day-to-day administration
- looking after students' educational, social and medical well-being
- satisfying the School's legal obligations and allowing 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.

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

In relation to personal information of applicants for positions at the School, staff members and contractors, the School's primary purpose of collection is to assess and/or engage the applicant, staff member or contractor.

The purposes for which the School uses personal information of applicants for positions at the School, staff members and contractors include:

- administering the individual's employment or contract
- insurance purposes
- seeking funds and marketing for the School
- satisfying the School's legal obligations; for example, in relation to child protection legislation
- providing references to prospective employers.

### **Volunteers**

The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as for the Cranbrook School Parents' Association (CSPA) and the Old Cranbrookians' Association (OCA), 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 students 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 the OCA.

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

### **To whom might the School disclose personal information?**

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
- parents
- anyone authorised to receive such information.

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; for example when a School sporting team travels overseas
- otherwise complying with the National Privacy Principles.

### **How does the School collect and deal with sensitive information?**

In referring to sensitive information the School means:

- records of disciplinary action taken by the School
- 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
- health information about an individual.

Sensitive information will only be collected with the individual's consent, or in the case of a student, with the consent of the student's parent or legal guardian, or otherwise where such collection is required by law.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless agreement is obtained, or the use or disclosure of the sensitive information is allowed by law.

### **Management and security of personal information**

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

The School has procedures in place to protect the personal information the School holds from misuse, loss, unauthorised access, modification or disclosure through various methods including locked storage of paper records, pass-worded access rights, computerised records and a staff policy published in the *Staff Handbook*. The policy will be made available to Parents who ask for it.

### **Updating personal information**

The School endeavours to ensure that the personal information it holds is accurate, complete and up to date. A person may seek to update personal information held by the School at any time by contacting the Admissions Department, a student's class teacher or Housemaster, or the Business Manager.

The School will not store personal information longer than necessary in accordance with the National Privacy Principles.

### **Checking personal information held by the School**

Under the *Commonwealth Privacy 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. There are some exceptions set out in the Act. Students will generally have access to their personal information through their parents, but older students may seek access themselves. To access information held by the School requests must be made in writing to the Director of Admissions, the Business Manager or the Headmaster.

The School may require verification of identity and specification of the information required. The School may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive the School will advise the likely cost in advance.

### **Consent and rights of access to the personal information of students**

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

Generally, the School will refer any requests 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.

Parents may seek access to personal information held by the School about them or their son by contacting the Director of Early Learning, the Head of the Junior School or the Headmaster. However, there will be occasions when access is 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 about them held by the School, or allow a student to give or withhold consent to the use of their personal information independently of his Parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

### **Enquiries**

Further information about the way the School manages the personal information it holds may be obtained from the Headmaster's Secretary.