



# PRIVACY POLICY

## Introduction

This Privacy Policy details how Cranbrook School (the "School") manages personal information and complies with the requirements of the *Privacy Act 1988* (Cth) and the Australian Privacy Principles, as well as the requirements of the *Health Records and Information Privacy Act 2002* (NSW) and the Health Privacy Principles.

Employee records are not covered by the Australian Privacy Principles or the Health Privacy Principles where they relate to a current or former employment relationship between the School and the employee. As a result, this Privacy Policy does not apply to the School's treatment of an employee record where this is directly related to a current or former employment relationship between the School and the employee.

## Who Does the School Collect Personal Information From?

Cranbrook School collects personal information from students, prospective students, parents/guardians, prospective parents/guardians, job applicants, staff, volunteers, alumni, contractors, visitors and others that may come into contact with the School.

## What Kinds of Personal Information Does the School Collect?

The kinds of personal information the School collects is largely dependent upon whose information is being collected and why it is being collected, however in general terms the School may collect:

- Personal Information including names, addresses, other contact details, dates of birth, next of kin details, financial information, photographs, images, school reports and attendance records.
- Sensitive Information including religious beliefs, government identifiers, nationality, country of birth, racial or ethnic origin, languages spoken at home, political, professional or trade union memberships, political opinions, philosophical beliefs, sexual orientation, family court orders and criminal records.
- Health Information including medical records, disabilities, allergies, immunisation details, individual health care plans, counselling reports and notes, nutrition and dietary requirements.

## How Does the School Collect Personal Information?

The School generally collects personal information by way of forms filled in by you, email, letters, notes, over the telephone, in face to face meetings, through financial transactions, and through surveillance activities such as the use of CCTV security cameras or email monitoring.

The School may also collect personal information from other people (for example, a personal reference or report from a medical professional) or independent sources (for example, a telephone directory), however the School will only do so where it is not reasonable and practical to collect the information directly from you.

In some cases, where the School has requested personal information about you, if the information is not provided, the School may not be able to continue its relationship with you. In the case of a student or parent/guardian, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the student or permit the student to participate in a particular activity.

Sometimes the School may be provided with personal information without having sought it. Where the School collects such unsolicited information, that information will only be held, used and disclosed if the School could otherwise do so had it been collected by normal means. If that unsolicited information could not have been collected by normal means then the School will destroy, permanently delete or de-identify the information as appropriate.

## How the School Uses Personal Information

The purposes for which the School collects, holds, uses and discloses personal information include but are not limited to:

- Providing education, pastoral care, extra-curricular and health services to students;
- Satisfying legal obligations including duty of care and child protection obligations;
- Keeping parents/guardians informed about matters relating to their child's schooling and School community matters through correspondence, newsletters and magazines, on its website and intranet, and through social media;
- Marketing, promotional, networking, social and fundraising activities;
- Supporting the activities of the Cranbrook Foundation and School associations including the Old Cranbrookians' Association Inc. and the Cranbrook School Parents' Association Inc.;
- Supporting community causes, activities, charities and other causes in connection with the School's functions or activities;
- Helping to improve day to day operations including training of staff, systems development, developing new programs and services, and undertaking planning, research and statistical analysis;
- Day to day operations and administration of the School, including for insurance purposes; and
- Employment/engagement of staff, contractors and volunteers.

The School will only use personal information for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection (or directly related to the primary purpose of collection in the case of sensitive information) and that would be reasonably expected by you.



The School may also use personal information if you have consented to that use, the use is necessary to lessen or prevent a serious threat to life, health or safety, a permitted general situation (such as locating a missing child) or permitted health situation (such as to a health professional providing a health service) exists, the use is required or authorised by law or the use is reasonably necessary for a law enforcement activity.

### **When the School Discloses Personal Information**

Disclosures of personal information may be made to government agencies or departments, other parents/guardians, other schools, recipients of School publications such as newsletters and magazines, people who view the School's website or social media accounts, counsellors, medical professionals, volunteers, people providing services to the School such as contractors (for example, caterers and service tour operators), visiting teachers, specialist sporting or other coaches, agents, and business partners.

The School will only disclose personal information for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection (or directly related to the primary purpose of collection in the case of sensitive information) and that would be reasonably expected by you.

The School may also disclose personal information if you have consented to that disclosure, the disclosure is necessary to lessen or prevent a serious threat to life, health or safety, a permitted general situation (such as locating a missing child) or permitted health situation (such as to a health professional providing a health service) exists, the disclosure is required or authorised by law or the disclosure is reasonably necessary for a law enforcement activity.

### **Marketing and Fundraising**

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

Personal information held by the School may be disclosed to organisations that assist in the School's fundraising, for example, the Cranbrook Foundation or external fundraising organisations.

Personal information may be contained in School publications including newsletters and magazines, the School website and intranet, and School social media accounts, which are used for marketing purposes including relating to fundraising. These are distributed to current, prospective and past parents/guardians, students, alumni, staff, contractors and other members of the wider School community.

### **Disclosure of Personal Information to Overseas Recipients**

The School may disclose personal information about an individual to overseas recipients in certain circumstances. Such circumstances may include when the School is organising an overseas excursion, facilitating a student exchange, storing information with a "cloud service provider" which stores data outside of Australia, or establishing online accounts for students for educational tools where data relating to the account is stored

outside of Australia. These overseas recipients may be located in many different countries.

The School will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- The School has the individual's consent (which may be implied);
- The School has satisfied itself that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime;
- The School forms 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
- The School is taking appropriate action in relation to suspected unlawful activity or serious misconduct.

### **Storage and Security of Personal Information**

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

The security of your personal information is important to the School and the School takes all reasonable steps to protect the personal information it holds about you from misuse, interference, loss, and 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 where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms, and 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 security systems, policies and procedures designed to protect personal information on the School's networks.
- Implementing policies and procedures, such as email and internet usage, password security, 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.

Personal information 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. The School does not share your personal information with those websites and it is not responsible for their privacy practices.



## Personal Information of Students

The *Privacy Act 1988* (Cth) 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.

Cranbrook 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/guardians. The School will treat notices provided to parents/guardians as notices provided to students and consents provided by parents/guardians as consents provided by a student.

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. There may also be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/guardians.

There may also be occasions where parents/guardians 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, result in a breach of the School's duty of care to the student or where the student has provided information in confidence.

## How The School Ensures the Quality of Your Personal Information

The School takes all reasonable steps to ensure the personal information held, used and disclosed is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing personal information.

On an ongoing basis the School maintains and updates personal information when advised by individuals or when it becomes aware through other means that their personal information has changed.

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

## How To Gain Access to or Request a Change to Your Personal Information the School Holds

You may request access to the personal information the School holds about you, or request that the School changes the personal information, by contacting the School's Privacy Officer in writing or by email.

If the School does not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate the School will provide you with the reason for this decision. If a request to change your personal information is rejected by the School, you may make a statement about the requested change and the School will attach this to your record.

## Privacy Complaints

If you wish to make a complaint about an alleged privacy breach by the School you may do so by providing your complaint by email or letter to the School's Privacy Officer. You may also make a complaint verbally.

The Privacy Officer will respond to your complaint within a reasonable time (usually no longer than 30 days) and 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 the Cranbrook School Privacy Officer

You can contact the School's Privacy Officer about this Policy or about your personal information by:

- Emailing: [privacy@cranbrook.nsw.edu.au](mailto:privacy@cranbrook.nsw.edu.au)
- Calling: +61 2 9327 9405
- Writing to: Privacy Officer, Cranbrook School, 5 Victoria Road, Bellevue Hill NSW, 2023.

You can contact the Privacy Officer anonymously or by using a pseudonym, however if you choose not to identify yourself, the School may not be able to give you the information or provide the assistance you might otherwise receive.

## Changes to the Privacy and Information Handling Practices

The School may review and update this Privacy Policy to take account of new or changed laws or technology, changes to the School's operations and practices and to make sure it remains appropriate to the changing School environment. As such, this Privacy Policy is subject to change at any time. Please check the School's Privacy Policy on the School's website regularly for any changes.