

## 10. Privacy

Ipswich Girls' Grammar School including Ipswich Junior Grammar School (the School) is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988. This policy sets out how the School manages information provided to or collected by it.

The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the School site; and describes the type of information the School collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

The School may from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to school operations and practices and to ensure it remains appropriate to the changing school environment.

Ipswich Girls' Grammar School including Ipswich Junior Grammar School collects personal and sensitive information for the primary purpose of providing quality educational services to its students. All information collected by the School is treated as confidential and is stored in secure locations.

### **Personal Information the School collects and how it is collected**

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

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the School:
  - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
  - parents' education, occupation and language background;
  - medical information (eg details of disability and/or allergies, absence notes, medical reports and names of doctors);
  - conduct and complaint records, or other behaviour notes, and school reports;
  - information about referrals to government welfare agencies;
  - counselling reports;
  - health fund details and Medicare number;
  - any court orders;
  - volunteering information; and
  - photos and videos at school events.
- job application, staff members, volunteers and contractors:
  - name, contact details (including next of kin), date of birth, and religion;
  - information on job application;
  - professional development history;
  - salary and payment information, including superannuation details;
  - medical information (eg details of disability and/or allergies, and medical certificates);
  - complaint records and investigation reports;
  - leave details;
  - photos and videos at school events;
  - workplace surveillance information;
  - work emails and private emails (when using work email address) and internet browsing history.
- other people who come into contact with the School including name and contact details and any other information necessary for the particular contact with the School.

**Personal information you provide:** The School will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, letters, emails and telephone calls. On occasions 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 from a third party, for example a report provided by a medical professional or a reference.

**Exception in relation to employee records:** Under the Privacy Act, the Australian Privacy Principles 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 employee.

### **How the School will use 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 and reasonably expected, or to which you have consented.

**Students and Parents:** In relation to personal information of students and Parents, the School's primary purpose of collection is to enable the School to provide a quality education to the student, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School. This includes satisfying the needs of Parents, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School.

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

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

On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. The School will obtain permissions annually from the student's parents or guardian if we would like to include such photographs or videos (or other identifying material) in our promotional material or otherwise make this material available to the public such as on the internet.

**Job applicants, staff members and contractors:** In relation to the personal information of job applicants, staff members and contractors, the School's primary purpose of collection is to assess and (if successful) engage the applicant, staff member or contractor, as the case may be. The School may keep this information on file for 1 year if the application is unsuccessful, in case another position becomes available. The applicant should advise the School if they do not wish this to happen.

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

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

**Volunteers:** The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as alumni associations, 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 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 Old Girls Association, the Parents and Friends Association, the School's Development Office.

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

### **Disclosure of personal information**

The School may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes. This may include to

- another school;
- government departments;
- medical practitioners;
- people providing educational, support and health services to the School, including specialist teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- people providing administrative and financial services to the School;
- recipients of School publications, such as newsletters and magazines;
- the individual's Parents;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required to disclose information by law, including child protection laws.

**Sending information overseas:** The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, the School will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this content will be implied)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Ipswich Girls' Grammar may use online or 'cloud' service providers to store personal information and to provide services to Ipswich Girls' Grammar that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

An example of such a cloud service provider is Microsoft 365. Microsoft provides the 'Microsoft Office 365 Suite for Education' (Microsoft, stores and processes limited personal information for this purpose. School personnel and the AIS and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering Micro and ensuring its proper use.

The data centres where the personal information is likely to be kept are located in Australia.

### **Treatment of sensitive information**

Sensitive information means information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information, health information and biometric 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 sensitive information is allowed by law.

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

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

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

### **Data Breaches**

It will be deemed that an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (the affected individuals)
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result
- the information is lost in circumstances where:
  - unauthorised access to, or unauthorised disclosure of, the information is likely to occur
  - assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

If the School suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then the School will be required to lodge a statement to the Privacy Commissioner (Commissioner). Where practical to do so, the School entity will also notify the affected individuals. If it is not practicable to notify the affected individuals, the School will publish a copy of the statement on its website, or publicise it in another manner.

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

### **Access and updating of personal information**

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date.

Under the 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 to this right set out in the Act. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

A person may seek to access or update their personal information by contacting the School at any time. To make a request to access or update any personal information that the School holds about you or your child, please contact the Principal in writing. Parents may update some personal information relevant to themselves or their child through the secure parent portal, Parent Lounge.

The School may require you to verify your identity and specify what information you require. The School may charge a fee to cover the cost of verifying your 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. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

### **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 for consent and notices 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.

As mentioned above, Parents may seek access to personal information held by the School about them or their child by contacting the Principal. However, there will be occasions when access is denied. Such occasions would include where the 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.

A School may, at its discretion, on the request of a student grant that student access to information held by the School about them, or allow a student to give or withhold consent to the use of their personal information, independently of their Parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

### **Enquiries and complaints**

If you would like further information about the way the School manages the personal information it holds, or wish to make a complaint that you believe that the School has breached the Australian Privacy Principles, please contact the Principal. The School will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.

### **References**

*Australian Privacy Principles*  
*Privacy Act 1988 (Cth)*  
*Child Protection Policy*  
*Disabilities Policy*

Last Reviewed	January 2020
Due for Review	January 2021