



This Privacy Policy sets out how the School manages personal information provided to or collected by it.

The School is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth). In relation to health records, the School is also bound by the Health Privacy Principles, which are contained in the *Health Records Act 2001* (Vic) and the Health Privacy Principles which are contained in that Act.

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 KINDS 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 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, including:
  - name, contact details (including next of kin), date of birth, previous school and religion;
  - parents' education, occupation and language background;
  - medical information (e.g. 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;
  - CCTV cameras located at the school
  - school's website or school-controlled social media
- job applicants, staff members, volunteers and contractors, including:
  - 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 (e.g. 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; and

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, 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 from another school.

**Exception in relation to employee records:** Under the *Privacy Act 1988* (Cth), 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. The School handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001 (Vic)*.

### 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 and reasonably expected by you, 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 schooling to students enrolled at the school, 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:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the School; and
- satisfying 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.

**Counsellors:** The School contracts with external providers to provide counselling services for some students. The Principal may require the Counsellor to inform him or her or other teachers of any issues the Counsellor believes may be necessary for the School to know for the wellbeing or development of the student who is counselled or other students at the School.

**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 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 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, like newsletters and magazines, which include personal information, may be used for marketing purposes.

### WHO MIGHT THE SCHOOL DISCLOSE PERSONAL INFORMATION TO AND STORE YOUR INFORMATION WITH?

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

- other schools and teachers at those schools;
- government departments;
- medical practitioners;
- people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools;
- providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection and students with additional needs
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA), NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN) and the Victorian Curriculum and Assessment Authority (VCAA);
- people providing administrative and financial services to the School;
- recipients of School publications, such as newsletters and magazines;
- students' parents or guardians;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.



**Sending and storing 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 consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The School may use online or 'cloud' service providers to store personal information and to provide services to the School 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 servers which may be situated outside Australia.

An example of such a cloud service provider is Microsoft 365 which provides services including email, and stores and processes limited personal information for this purpose. School personnel 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 Microsoft 365 and ensuring its proper use.

**Nationally Consistent Collection of Data on School Students with Disability:** The school is required by the *Federal Australian Education Regulation 2013 (Cth)* and *Australian Education Act 2013 (Cth)* to collect and disclose certain information under the Nationally Consistent Collection of Data (NCCD) on students with a disability. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

#### 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, 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 the 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 the School holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records website protection measures including firewalls and anti virus software, and password access rights to computerised records.

#### ACCESS AND CORRECTION OF PERSONAL INFORMATION

Under the *Privacy Act 1988 (Cth)* and the *Health Records Act 2001 (Vic)*, an individual has the right to seek and obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or to update any personal information the School holds about you or your child, please contact the Registrar by email to [admin@scg.vic.edu.au](mailto:admin@scg.vic.edu.au) or telephone 03 8363 2000. 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.

Parents may seek access to personal information held by the School about them or their child by contacting the Registrar by email to [admin@scg.vic.edu.au](mailto:admin@scg.vic.edu.au) or telephone 03 8363 2000. However, there may 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 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 warrant it.

### **NOTIFIABLE DATA BREACH**

The school is required to take reasonable steps to ensure the security of personal information. In circumstances of a suspected data breach, the school will undertake an assessment to determine if the data breach is likely to result in serious harm and if so, notify individuals at risk of serious harm, and the Office of the Australian Information Commissioner (OAIC).

### **ENQUIRIES AND COMPLAINTS**

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles please contact the Registrar by email to [admin@scg.vic.edu.au](mailto:admin@scg.vic.edu.au) or telephone 03 8363 2000. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

### **RELEVANT LEGISLATION**

*Australian Education Act 2013 (Cth)*

*Australian Education Regulation 2013 (Cth)*

*Freedom of Information Act 1982 (Cth)*

*Health Records Act 2001 (Vic)*

*Privacy Act 1988 (Cth)*