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| Subject: PRIVACY POLICY | Policy No: ADM6 – Version 4 Effective: 12 March 2014 Revised: August 2020 Review Date: November 2022 |
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PRIVACY POLICY

This Privacy Policy sets out how St Michael's Collegiate School ("School") manages personal information provided to or collected by it.

The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988, as amended ("the 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.

When the School acts as a credit provider our credit information privacy policy also applies.

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 health and other sensitive information, about:

- Students and/or children ('Students') and parents and/or guardians ('Parents') before, during and after the course of a students' enrolment at the School;
- Students that are enrolled at The Hutchins School (and their Parents/Guardians) and who participate in the Years 11/12 student program at the School or whose information is collected through the ICT and accounts resource sharing arrangement between The Hutchins School and the School;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the School.

Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

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.

Personal information from other sources: in some circumstances the School may be provided with, or collect, personal information about an individual from a third party or other source. This may happen where:

- the individual, or their Parent, has consented to the collection of that information from someone else;
- the School is required or authorised to by law to collect the information from someone else; or
- it is unreasonable or impracticable to collect the information from the individual personally.

Examples of personal information collected from other sources include a report provided by a medical professional, a reference from another school or personal information that may be provided by The Hutchins School in relation to the Years 11/12 student program, or resource sharing/collaboration arrangements between The Hutchins School and the School.

Exception in relation to employee records: under the 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.

Notification of collection of personal information: When the School receives personal information directly from an individual, we will take reasonable steps to notify that individual of the collection and the circumstances that surround the collection. Sometimes we collect personal information from third parties or an individual may not be aware that we have collected their personal information. If the School collects information that can be used to identify an individual, we will take reasonable steps to notify that individual of the collection and the circumstances that surround the collection.

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 are 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 for the Student. 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 of the School;
- looking after Students' educational, social and medical wellbeing;
- seeking donations and marketing for the School; and

- 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 Student or Parent, 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 take part in a particular activity.

The Hutchins School: in relation to personal information of students of The Hutchins School (and their Parents/Guardians), the School's primary purpose of collection is to:

- facilitate the administration, operation and management of the Years 11/12 student program with The Hutchins School (if applicable); and
- facilitate the educational, administrative and operational functions of ICT, resource sharing and collaboration with The Hutchins School.

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 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 philanthropy: 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 Committee or alumni organisations.

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?

The School may disclose personal information, including sensitive information, held about an individual to:

- another school (including The Hutchins School in connection with the Years 11/12 student program),

- another school (including The Hutchins School in connection with resource sharing and other arrangements),
- government departments;
- medical practitioners;
- people providing services to the School including specialist visiting teachers, counsellors and sports coaches;
- recipients of School publications, such as newsletters and magazines;
- Parents;
- anyone you authorise the School to disclose information to; and
- anyone to whom the School are required to disclose the information by law.

Sending information overseas: the School may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia or to facilitate a school exchange. However, the School will not send personal information about an individual outside Australia without otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

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 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. We may disclose Students' health information to The Hutchins School as part of the Years 11/12 student program (if applicable) to enable Hutchins to look after the wellbeing of Students participating in that program.

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 and password access rights to computerised records.

The School has in place an agreement with The Hutchins School in relation to the sharing of personal information as part of the Years 11/12 student program and the ICT and accounts resource sharing arrangement between both schools. This agreement contains protections and obligations on both the School and The Hutchins School to ensure the security and confidentiality of any personal information shared between the schools as part of these programs.

Management of unsolicited personal information: If the School receives personal information about an individual that it did not ask for, we will check whether that information is reasonably necessary for our functions and activities. If it is, we will handle this information in the same way we do with other personal information collected from individuals. If not, we will destroy it or de-identify the information provided it is lawful and reasonable to do so and the information is not contained in a Commonwealth record.

Reporting Eligible Data Breaches:

An eligible data breach is either:

- Unauthorised access or disclosure of information or information that relates to you that a reasonable person would conclude is likely to result in serious harm; or
- Where your information or information is lost in circumstances where unauthorised access or disclosure of information is likely to occur and it can be reasonably concluded that such an outcome would result in serious harm to them.

If the School suspects there has been an eligible data breach we will carry out a reasonable and expeditious assessment.

If we have reasonable grounds to believe that there has been an eligible data breach, we will notify all relevant individuals and the Office of the Australian Information Commissioner and will provide:

- a description of what occurred;
- the kinds of information concerned; and
- recommended steps that they should take in response to the data breach.

Access and correction of personal information: under the 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. Students will generally be able to access and update their personal information through their Parents, but older Students may seek access themselves. There are some exceptions to these rights set out in the Act, which include, for example, where giving access would have an unreasonable impact on the privacy of others or the request is frivolous or vexatious.

To make a request to access or update any personal information the School holds about you or your child, please contact the School Principal in writing. 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 the 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 School Principal. 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 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.

When is personal information destroyed?

The Privacy Principles require the School not to store personal information longer than necessary. We regularly conduct reviews of the personal information we hold. If we determine that we no longer require personal information we will destroy or de-identify that information within a reasonable time.

Enquiries and complaints

If you would like a copy of this policy, further information about the way the School manages the personal information it holds or to lodge a complaint if you believe the School has breached the Australian Privacy Principles, please contact the Chief Operating Officer. The School will investigate any complaint and will notify you of a decision made in relation to your complaint as soon as practicable after it has been made.

The School can be contacted by email at:

collegiate@collegiate.tas.edu.au and privacy@collegiate.tas.edu.au

By mail:

Chief Operating Officer
St Michael's Collegiate School
218 Macquarie Street
HOBART TAS 7000

By telephone: 03 6211 4902

If you are not happy with the School's decision you may make a complaint to the Office of the Australian Information Commissioner. Their contact details are:

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Mail: GPO Box 5218 Sydney NSW 2001

Online: <http://www.oaic.gov.au/privacy/privacy-complaints/>