



# PRIVACY POLICY

## YOUR PRIVACY IS IMPORTANT

This Privacy Policy sets out how Knox Grammar School uses and 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*. In relation to health records, the School is also bound by the Health Privacy Principles which are contained in the *Health Records and Information Privacy Act 2002 (NSW) (Health Records 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, gender, language, background, 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 complaints 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 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.
- 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.

The School may also collect personal information indirectly through its use of closed circuit television (video) cameras installed across each of its educational campuses, boarding houses and sports facilities, to assist the School to meet its duty of care (and specifically to assist it provide a safe and secure environment for students, staff and visitors) and as a security measure. Except where required to assist with an ongoing investigation, or otherwise for the protection of lawful interests, CCTV footage is retained for a limited period of time before being deleted.

## **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, telephone calls and 'cookies' from the School's websites or apps. 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 and the Health Records Act, the Australian Privacy Principles and Health 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 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 for 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:

- to keep parents informed about matters related to their child's schooling, through amongst other things correspondence, newsletters and magazines;
- day-to-day administration;
- 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.

### **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 member and contractors 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 and work health and safety legislation.

### **Volunteers**

The School also obtains personal information about persons including volunteers who assist the School in its functions or conduct associated activities, such as the Knox Parents Association and the Old Knox Grammarians (alumni) Association (OKGA), to enable the School and such persons to work together.

### **Marketing and fundraising**

The School treats marketing and seeking donations for future growth and development of the School as an important part of ensuring that the School continues to provide a high 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 the OKGA or, on occasions, external fundraising organisations.

Parents, staff, contractors and other member of the wider School community may from time to time receive fundraising information. Amongst other things, the School uses information collected to update and improve its websites. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

## **TO WHOM MIGHT THE SCHOOL DISCLOSE PERSONAL INFORMATION AND WITH WHOM MIGHT IT STORE SUCH INFORMATION?**

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 (including for policy and funding purposes);
- medical and other health practitioners;

- people providing educational, support and health services to the School, including specialist visiting teachers, sports, music and other coaches, instructors and tutors, contractors such as caterers, the Australian Army Cadets, volunteers and counsellors;
- providers of specialist advisory services and assistance to the School, including in the areas of staff services (human resources), child protection and students with additional needs;
- 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;
- affiliated bodies such as the Uniting Church in Australia (NSW) and other related church agencies/entities including schools;
- recipients of School publications, like newsletters and magazines;
- students, parents or guardians;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required 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.

Examples of such cloud service providers are Microsoft (Office 365) and Google (G-Suite). Both providers store and process limited personal information for the purpose of authentication and functionality. Such information can be accessed by school personnel for the purpose of administering these platforms.

## **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 and password access rights to computerised records.

## **ACCESS AND CORRECTION OF PERSONAL INFORMATION**

Under the Commonwealth *Privacy Act* and the Health Records Act, 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 School's Privacy Officer (the Media Communications Manager) 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, if relevant, copying any material requested. If the information sought is extensive, the School will advise the likely cost in advance and may discuss options with you. If we cannot provide you access to that information, we will provide you with written notice. Unless it would be unreasonable to do so, the notice would include the reason(s) 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 School's Privacy Officer (the Media Communications Manager) in writing or the relevant Head of School. 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, independent of their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant such action.

## ENQUIRIES, CONCERNS AND COMPLAINTS

If you would like further information, or wish to raise a concern or make a complaint, about the way the School manages the personal information it holds, or you believe the School has breached the Australian Privacy Principles please contact the Media Communications Manager via the School Switchboard on +61 2 9487 0122 or by email: [hayesd@knox.nsw.edu.au](mailto:hayesd@knox.nsw.edu.au).

The School will reply to your request for further information, or inquire into and, as appropriate, investigate, your concern or complaint and will respond or notify you of the making of a decision as soon as is practicable, in accordance with the School's Complaints Handling Policy.

## POLICY CONTACT

**Document Owner:** Media Communications  
**Responsibility:** Media Communications Manager  
**Phone:** 02 9487 0175

## DOCUMENT INFORMATION AND CONTROL

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