



Churchie.

PRIVACY POLICY

Contact Officer:	Director of Business and Finance
Date Approved by School Council:	29 September 2023
Date for Next Review:	September 2026
Related Policies or Legislation:	Privacy Act 1988; Privacy Regulation 2013; Australian Privacy Principles (APPs)

INTRODUCTION

Anglican Church Grammar School (the School) is operated by the Corporation of Synod of the Diocese of Brisbane (the Anglican Church Southern Queensland). It is committed to protecting the privacy of its employees, students and parents.

The School is bound by the Australian Privacy Principles (APPs) and the *Privacy Act 1988* (Cth) (the Act).

SCOPE

This policy applies to students, parents, School Council members, employees and volunteers. It outlines how the School manages personal information collected by it.

POLICY TYPE

This policy relates to statutory compliance and must be approved by School Council.

DEFINITIONS

Employee means any person employed by the School, including applicants, past employees and prospective employees.

Employee Record means a record as defined in the Act.

Parent means the parent, guardian or carer of a prospective, current or past student.

Student means a prospective, current or past student of the School.

Personal information is information or an opinion, whether true or not and whether recorded in material form or not, about an identified individual or an individual whose identity is reasonably apparent in, or can be determined from, the relevant information or opinion.

Sensitive information is a type of personal information. It includes information or opinion about an individual's racial or ethnic origin, political opinions or associations, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preference or practice, gender identity or criminal record. Sensitive information also includes biometric information that is used for the purpose of automated biometric verification, biometric identification or biometric templates.

Health information is a subset of sensitive information. It is information or an opinion about the health or disability of an individual and information collected to provide, or in providing a health service.

Health service includes an activity performed to assess, record, maintain or improve an individual's health, to diagnose an illness or disability, to treat an individual, or the dispensing on prescription of a drug or medicinal preparation by a pharmacist.

1. PURPOSE

The School collects, holds, uses and discloses personal information so that it can exercise its function and activities as a school and fulfil relevant duties and obligations.

That may include (but is not limited to):

- a) contacting and informing parents about the student's education and other matters relating to the student's activities at the School
- b) contacting School Council members and employees
- c) the School's administrative purposes, such as collecting outstanding fees and arranging for the provision of such services to the School
- d) supporting a student's educational, social and medical wellbeing
- e) seeking donations for the School
- f) marketing the School
- g) satisfying the legal obligations of the School.

The School generally collects and holds personal information, sensitive information and health information about:

- h) students and parents, relating to the enrolment of the student at the School and the activities of the student while at the School
- i) employees
- j) volunteers and contractors who provide services to the School, including School Council members
- k) other persons who are involved with the operations of the School.

The School collects personal information about these individuals to satisfy its legal obligations and to enable it to fulfil its educational and administrative functions and objectives. If the School requests information to be provided and the request is not complied with, the School may be unable to provide any or all of its services, such as enrolling a prospective student or continuing the enrolment of a current student.

2. COLLECTION

2.1 Personal Information

The School collects personal information about an individual by way of forms, letters, emails, face-to-face meetings, interviews and telephone calls. Wherever practical or reasonable, the School will collect that information directly from the individual.

The School may collect personal information about an individual from a third party where it is reasonably necessary to do so, for example, a medical practitioner providing a report. This is also the case when the School collects personal information about a student from the student's parent.

If the School collects any personal information that is unsolicited, the School will determine as soon as is reasonably practical whether it could have itself collected that information as part of its functions or activities. If the School is not satisfied that it could have lawfully collected that information, it will (if lawful and reasonable to do so) destroy or de-identify that information.

2.2 Sensitive Information

Sensitive information (including health information) will be collected by the School where it is reasonably necessary for one or more of the School's functions or activities. It will only be collected with consent or where it is reasonably necessary for the School to do so to enable it to carry out its services or functions, unless one of the exceptions under the APPs applies.

2.3 Employee Records

Under the Act, the APPs do not apply to employee records. This means that the Act does not apply to how the School deals with an employee record and the information held by the School in that employee record.

2.4 Anonymity

Individuals may choose to deal with the School anonymously or under a pseudonym, where lawful to do so. However, that may mean that the School is unable to provide the required services and if so, it may require that the individual identify themselves before providing any services.

3. USE AND DISCLOSURE

3.1 Primary Purpose

The School will only use and disclose personal information for the primary purpose for which it was collected, as authorised by law or as otherwise specified in this Privacy Policy.

3.2 Secondary Purpose

Personal information may also be used for purposes other than the primary purpose if consent from the individual has been obtained, where the individual would reasonably expect the School to use the personal information in that way (and in the case of sensitive information is directly related to the primary purpose) or if such use or disclosure falls within a permitted exception under the Act.

3.3 Disclosure to Diocese

The School may disclose personal information to the Corporation of Synod of the Diocese of Brisbane for administrative and management purposes, including to enable the Diocese to provide insurance services to the School and for child protection and professional standards purposes.

3.4 Disclosure to Service Providers

Personal information may also be disclosed to external service providers or third parties engaged by the School, in order for those service providers to fulfil their service obligations to the School.

3.5 Overseas Disclosure

The School may transfer personal information about an individual to overseas countries in order to perform its functions or activities. This may happen when the School stores personal information on its servers which are managed by third parties who then transfer and manage the data in an overseas location. The location will vary according to which service provider is used by the School. In those circumstances, the School will take reasonable steps to ensure the overseas recipient does not breach the APPs.

4. QUALITY OF INFORMATION AND SECURITY

4.1 Accuracy

If an individual believes their personal information is not accurate, complete or up to date, they should contact the School (see Section 7 and Contact Details in Section 10).

4.2 Security

The School will take all reasonable steps to:

- a) protect personal information from misuse, interference, loss, unauthorised access, modification or unauthorised disclosure; and
- b) destroy or de-identify personal information that is no longer needed.

4.3 Data Breaches

In the event of a data breach or suspected data breach, the school will enact its Data Breach Response Plan. In the event of a data breach that could lead to a risk of harm to affected individuals, the School will conduct reasonable and expeditious assessment of the circumstances and report the data breach to the relevant authorities as is required by the Privacy Amendment (Notifiable Data Breaches) Act 2017.

5. ACCESS TO PERSONAL INFORMATION

Under the Act, an individual has the right to obtain access to personal information which the School holds about them; there are exceptions to this, for example, where access may impact the privacy of others or pose as a threat to the individual.

To make a request to access personal information, the School requires a request to be submitted in writing to the Director of Business and Finance at the School (see Contact Details in Section 8).

The School will acknowledge the request within five business days of the request being made. If the School intends to deny access, it will usually advise the applicant in writing and the reasons for this within 10 business days of the acknowledgement of request. If the School intends to grant access, access will usually be granted within 10 business days of acknowledgement of the request or, if the request involves complex considerations or multiple photocopying, within 20 business days. The School will inform the applicant as to the appropriate time frame.

While the School cannot charge any application fee to apply to access personal information, it reserves the right to charge a fee to actually give access to that personal information. This is intended to cover any costs incurred by the School involved in locating and collating information as well as providing copies.

Once a request has been processed by the School, it may forward the required information to the applicant by mail or email or the applicant may personally inspect it at the location where the information is held.

Under the Privacy Act, the School may refuse to grant access to personal information in certain circumstances. These include:

- (i) a belief that giving access would pose a serious threat to the life, health or safety of any individual or to general public health or public safety
- (ii) it would have an unreasonable impact on the privacy of other individuals
- (iii) denial of access is required or authorised by law or court or tribunal order
- (iv) the request is frivolous or vexatious
- (v) giving access would be unlawful
- (vi) legal proceedings against the School are under way or anticipated and that information would not be accessible by way of discovery process in those proceedings.

If the School does not agree to make any correction or amendment to personal information, an individual may give a statement to the School about the requested corrections and the School will ensure the statement is apparent to any users of that relevant personal information.

If the School does not agree to give access to an individual's personal information or to correct it, it will give written reasons and what the steps are to complain about that refusal.

6. MARKETING AND FUNDRAISING

The School engages in marketing and fundraising as a means to promote future growth and sustain and improve the educational environment for students.

Personal information collected may be used to make a marketing or fundraising appeal. The School will abide by any direction from an individual not to disclose personal information to third parties for marketing purposes. An individual may at any time opt

out of receiving any marketing materials by contacting the School (see Contact Details in Section 8).

7. COMPLAINTS

If an individual believes that the School has breached the APPs, a complaint can be made to the School.

All complaints should be in writing and directed to the Human Resources Manager or Director of Business and Finance. The School will investigate complaints in a timely manner and respond in writing.

If an individual is not satisfied with the School's response, a complaint can be lodged with the Office of the Australian Information Commissioner. Details about this process can be found at <https://www.oaic.gov.au/privacy/privacy-complaints/>.

8. CONTACT DETAILS

Director of Business and Finance
Anglican Church Grammar School
Oaklands Parade
East Brisbane QLD 4169
Phone: 07 3896 2200

STANDARD COLLECTION NOTICE

ANGLICAN CHURCH GRAMMAR SCHOOL

PHONE: 3896 2200

1. Anglican Church Grammar School (the School) collects personal information, including sensitive information, about students and parents before and during the course of the student's enrolment at the School.
2. The primary purpose of collecting information is to allow the School to exercise its functions and activities and ultimately provide schooling to its students.
3. The School collects, uses, holds and discloses personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs).
4. Legislation that governs public health and child safety requires that certain types of information be collected by the School.
5. Some of the information that the School collects is to satisfy legal obligations and enables the School to discharge its duty of care. This includes health information about students. Health information is a subset of sensitive information; it is defined in the *Privacy Act 1988* (Cth) and is dealt with in accordance with the APPs.
6. If the School does not obtain the information referred to above, it may not be able to enrol or continue the enrolment of the student.
7. Personal and sensitive information collected by the School may be disclosed to others for administrative and educational purposes. This would include disclosure to other schools, government departments, the Corporation of the Synod of the Diocese of Brisbane the Anglican Church Southern Queensland and other persons providing services to the School. Sometimes that information is transferred and managed overseas, for example if the School's records are stored off site by third party providers.
8. Personal information collected from students is generally disclosed to parents. Personal information and images (for example, sporting and academic achievements) are published in the School newsletter and magazine and may be used for other School-related purposes. Please inform the School in writing if information in relation to the student is not to be used in this manner.
9. Personal information collected may be disclosed by the School to debt collection agencies for the purpose of recovering outstanding tuition fees.
10. Parents may seek to access information collected about their son by contacting the School. Access to personal information is dealt with in accordance with the School's Privacy Policy.
11. Parents may seek to have personal information corrected. Correction of personal information is dealt with in accordance with the School's Privacy Policy.

12. Members of the School community may make a complaint in accordance with the School's Privacy Policy if they believe the School has breached the APPs.
13. The School engages in marketing and fundraising activities. Personal information collected may be used to make a marketing or fundraising appeal. The School will abide by any direction from an individual to opt out of receiving emails for marketing and fundraising.
14. A copy of the School's Privacy Policy can be found at www.churchie.com.au. The policy may be updated as required, so you should check the School's website.