

# Privacy Policy

## VISION STATEMENT

GERALDTON GRAMMAR SCHOOL WILL PROVIDE OUTSTANDING EDUCATION AND A STRONG SENSE OF COMMUNITY, CULTIVATING PEOPLE OF INTEGRITY, INDEPENDENCE OF MIND AND A LOVE OF LEARNING.

<b>Introduction</b>	This statement outlines the Geraldton Grammar School policy on how the school uses and manages personal information provided to or collected by it.
<b>Scope and application</b>	Policy applies to all activities of Geraldton Grammar School
<b>Related legislation and guidelines</b>	Privacy Act 1988 (Cth), Australian Privacy Principles (APPs), Surveillance Devices Act 1998 WA
<b>Related Policies</b>	Records Retention, Retention of Correspondence and Emails by Schools (AISWA), Data Breach Policy
<b>Evaluation</b>	Biennial

<b>Date</b>	<b>Action</b> (issue, reissue, amendment, replacement of pages, etc)	<b>Initials</b>
6/06/02	Draft	SSW
6/02/09	Amended	SSW
31/03/10	Revised	SSW,SPN
27/03/13	Crest	SPN
14/03/14	Revised and updated – new AISWA guidelines	JRE
05/05/14	Revised and updated – new Privacy Principle Guidelines	MNN
31/07/17	Revised and amended	NJE
07/02/20	Re-written	MNN
08/04/20	CCTV included	MNN

## **Scope of policy**

This policy outlines the circumstances in which we obtain personal information, how we use and disclose that information and how we manage requests to access and/or change that information.

## **What is personal information and how do we collect it?**

Personal information is information or an opinion about an individual from which they can be reasonably identified. Depending on the circumstances, we may collect personal information from the individual in their capacity as a student, contractor, volunteer, stakeholder, job applicant, alumni, visitors or others that come into contact with the school.

In the course of providing services we may collect and hold:

- Personal Information including names, addresses and other contact details; dates of birth; next of kin details; photographic images; attendance records and financial information.
- Sensitive Information (particularly in relation to student and parent records) including government identifiers (such as TFN) religious beliefs, nationality, country of birth, professional memberships, family court orders and criminal records.
- Health Information (particularly in relation to student and parent records) including medical records, disabilities, immunisation details and psychological reports.

As part of our recruitment processes for employees, contractors and volunteers, we may collect and hold:

- Personal Information including names, addresses and other contact details, dates of birth, financial information, citizenship, employment references, regulatory accreditation, media, directorships, property ownership and driver's licence information.
- Sensitive Information including government identifiers (such as TFN) nationality, country of birth, professional memberships, family court orders and criminal records.
- Health Information (particularly in relation to prospective staff and student records) including medical records, disabilities, immunisation details and psychological reports.

Generally, we will seek consent from the individual in writing before we collect their sensitive information (including health information).

It is noted that employee records are not covered by the Australian Privacy Principles (APPs) where they relate to current or former employment relations between Geraldton Grammar School and the employee.

## **Collection of personal information**

The collection of personal information depends on the circumstances in which Geraldton Grammar School is collecting it, if it is reasonable and practical to do so, we collect personal information directly from the individual.

## **Solicited Information**

Geraldton Grammar School has, where possible, attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form or Medical Information Form). However, given the nature of our operations, we also receive personal information by email, letters, notes, via our website, over the telephone, in face-to-face meetings, through financial transactions and email monitoring.

We may also collect personal information from other people (e.g. a third-party administrator, referees for prospective employees) or independent sources. However, we will only do so where it is not reasonable and practical to collect the personal information from the individual directly.

## **Information collected from our website**

We may collect information based on how individuals use our website. We use "cookies" and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns and to record statistics on web traffic. We do not use this information to personally identify individuals.

## **Unsolicited information**

Geraldton Grammar School may be provided with personal information without having sought it through our normal means of collection. This is known as unsolicited information and is often collected by:

- misdirected postal mail - letters, notes, documents
- misdirected electronic mail - emails, electronic messages
- employment applications sent to us that are not in response to an advertised vacancy
- additional information provided to us which was not requested.

Unsolicited information obtained by Geraldton Grammar School will only be held, used and or disclosed if it is considered personal information that could have been collected by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the personal information as appropriate.

Collection and use of sensitive information. We only collect sensitive information if it is:

- reasonably necessary for one or more of these functions or activities, and we have the individual's consent
- necessary to lessen or prevent a serious threat to life, health or safety
- another permitted general situation
- another permitted health situation.

We may share sensitive information to other entities in our organisation structure, but only if necessary for us to provide our products or services.

### **How do we use personal information?**

Geraldton Grammar School only uses personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or for an activity or purpose to which you have consented.

Our primary uses of personal information include, but are not limited to:

- providing education, pastoral care, extra-curricular and health services
- satisfying our legal obligations including our duty of care and child protection obligations
- keeping parents informed as to school community matters through correspondence, newsletters and magazines
- marketing, promotional and fundraising activities
- supporting the activities of school associations such as the Parents and Friends Association
- supporting community-based causes and activities, charities and other causes in connection with the Schools functions or activities
- helping us to improve our day-to-day operations including training our staff
- systems development; developing new programs and services; undertaking planning, research and statistical analysis
- school administration including for insurance purposes
- the employment of staff
- the engagement of volunteers.

We will only use or disclose sensitive or health information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

We may share personal information to related bodies corporate, but only if necessary for us to provide our services,

Geraldton Grammar School may disclose information about an individual to overseas recipients only when it is necessary, for example, to facilitate a student exchange programme. Geraldton Grammar School will not, however, send information about an individual outside of Australia without the individual's consent.

### **Closed Circuit Television (CCTV)**

CCTV provides enhanced capability to protect our school's assets against vandalism and theft. The presence of CCTV cameras deters misconduct and inappropriate behaviour and reassures students, staff and visitors that all efforts are being made to assist with their protection when on school grounds.

Geraldton Grammar School uses CCTV systems for 24 hour video surveillance, which monitors and records activity around the School.

### **Use of CCTV footage**

Consistent with our school's obligations set out above, Geraldton Grammar School may use CCTV cameras to:

- prevent and verify incidents involving criminal behaviour – of anyone on school grounds
- verify other incidents – involving students, staff and visitors (e.g. incidents in which a person has sustained injury, loss or damage on school premises)
- to provide the Principal with visual coverage during emergencies

### **CCTV cameras are NOT:**

- hidden or covert
- located in private areas such as toilets, changing rooms or staff rooms
- used to monitor students
- used for workplace surveillance

### **Access to CCTV footage**

CCTV footage is only accessed for the purposes set out above at 'Use of CCTV footage' and only by the following people:

- the Principal or nominee, including people explicitly authorised by the Principal, (e.g. members of the school's IT department, security personnel)
- any other people permitted by law

### **Storage of Footage**

CCTV footage is kept for a maximum of 31 days. If our school has not used CCTV footage in any of the ways set out above, and there has been no request to view or access footage during this period, the footage is deleted.

### **Storage and Security of Personal Information**

Geraldton Grammar School stores Personal Information in a variety of formats including, but not limited to:

- databases or hard copy files
- personal devices, including laptop computers
- third party storage providers such as cloud storage facilities
- paper based files.

Geraldton Grammar School takes all reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. These steps include, but are not limited to:

- restricting access and user privilege of information by staff depending on their role and responsibilities.
- ensuring staff do not share personal passwords.
- ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege.
- ensuring access to Geraldton Grammar School's premises are secured at all times.

- implementing physical security measures around the school buildings and grounds to prevent break-ins.
- ensuring our IT and cyber security systems, policies and procedures are implemented and up to date,
- ensuring staff comply with internal policies and procedures when handling the information.
- undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far as practicable that they are compliant with the APPS or a similar privacy regime.
- the destruction, deletion or de-identification of personal information we hold that is no longer needed, or required to be retained by any other laws.

Our public website may contain links to other third-party websites outside of Geraldton Grammar School. Geraldton Grammar School is not responsible for the information stored, accessed, used or disclosed on such websites and we cannot comment on their privacy policies.

### **Responding to data breaches**

Geraldton Grammar School will take appropriate prompt action and follow our *Data Breach Policy* if we have reasonable grounds to believe that a data breach may have, or is suspected to have, occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If we are unable to notify individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

### **Disclosure of personal information**

Personal information is used for the purposes for which it was given to Geraldton Grammar School, or for purposes which are directly related to one or more of our functions or activities.

Personal information may be disclosed to government agencies, other parents, other schools, recipients of school publications, visiting teachers, counsellors and coaches, our services providers, agents, contractors, business partners, related entities and other recipients from time to time, if the individual:

- has given consent; or
- would reasonably expect the personal information to be disclosed in that manner.

Geraldton Grammar School may disclose personal information without consent or in a manner which an individual would reasonably expect if:

- we are required to do so by law.
- the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety.
- another permitted general situation applies.

- disclosure is reasonably necessary for a law enforcement related activity.
- another permitted health situation exists.

### **Disclosure of your personal information to overseas recipients**

Personal information about an individual may be disclosed to an overseas organisation in the course of providing our services, for example, when storing information with a "cloud service provider" which stores data outside of Australia.

We will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- we have the individual's consent (which may be implied);
- we have satisfied ourselves that the overseas recipient is compliant with the APPs or a similar privacy regime;
- we form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- we are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

### **Personal information of students**

The Privacy Act does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information.

At Geraldton Grammar School we take a common sense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students and we will treat consents provided by parents/carers as consents provided by a student.

We are however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older students and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents directly from students. We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the school's duty of care to the student.

### **The quality of personal information**

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up-to-date, including at the time of using or disclosing the information.

If Geraldton Grammar School becomes aware that the Personal Information is incorrect or out of date, we will take reasonable steps to rectify the incorrect or out of date information.

### **Access and correction of personal information**

You may submit a request to Geraldton Grammar School to access the personal information we hold, or request that we change the personal information. Upon receiving such a request/ we will take steps to verify your identity before granting access or correcting the information.

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 reject the request, you will be notified accordingly. Where appropriate, we will provide the reasons for our decision. If the rejection relates to a request to change personal information, an individual may make a statement about the requested change and we will attach this to their record.

### **Complaints**

You can make a complaint about how Geraldton Grammar School manages personal information, including a breach of the APPs by notifying us in writing as soon as possible. We will respond to the complaint within a reasonable time (usually no longer than 30 days) and we may seek further information in order to provide a full and complete response.

If you are not satisfied with our response, you may refer the complaint to the OAIC. A complaint can be made using the OAIC online Privacy Complaint form or by mail, fax or email.

A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

### **How to contact us**

Geraldton Grammar School can be contacted about this Privacy Policy or about personal information generally, by:

- emailing [ggs@gegs.wa.edu.au](mailto:ggs@gegs.wa.edu.au)
- calling +61 8 9965 7800
- in writing at PO Box 76 George Road, Geraldton WA
- facsimile at +61 8 9904 7176

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

Changes to our privacy and information handling practices and this Privacy Policy is subject to change at any time.