



**Caloundra City
Private School**

PRIVACY POLICY

Administration

June 2020

Privacy Policy

Purpose:	The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the School and describes how the School uses and manages personal information provided to or collected by it.	
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the School site; and describes the type of information the School collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.	
Status	10 June 2020 Version 1.01	Supersedes: New Policy
Authorised by:	Principal	Date of Authorisation: 10 June 2020
References:	<ul style="list-style-type: none"> • <i>Privacy Act 1988 (Cth)</i> • <i>Privacy Amendment (Enhancing Privacy Protection) Act 2012</i> • <i>Australian Privacy Principles</i> • CCPS Child Protection Policy • CCPS Disabilities Policy 	
Review Date:	Biennially As appropriate, to take account of new laws and technology, changes to school's operations and practices and to make sure it remains appropriate to the changing environment.	Next Review Date: June 2022
Policy Owner:	Board of Caloundra City Private School	

Privacy statement

Caloundra City Private School (the School) is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. The School collects personal and sensitive information from you for the primary purpose of providing educational services. All information collected by Caloundra City Private School is treated as confidential and is stored in a secure location. The information collected may be passed onto another association or organisation; a government department; a medical practitioner; and/or anyone you authorise the School to disclose information to. You may access personal information held about you by contacting the Principal in writing.

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.

Personal information collection and how it is collected

The type of information the School collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- a) pupils and parents and/or guardians ('parents') before, during and after the course of a pupil's enrolment at the School;
- b) job applicants, staff members, volunteers and contractors; and
- c) other people who come into contact with the School.

Exception in relation to employee records

Under the *Privacy Act 1988 (Cth)*, the Australian Privacy Principles do not apply to an employee record held by the employing entity. 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 Caloundra City Private School and employee.

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.

The type of information the School collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- a) students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the School:
 - i. name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
 - ii. parents' education, occupation and language background;
 - iii. medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
 - iv. conduct and complaint records, or other behaviour notes, and school reports; information about referrals to government welfare agencies;
 - v. counselling reports;

- vi. health fund details and Medicare number;
 - vii. any court orders;
 - viii. volunteering information; and
 - ix. photos and videos at school events.
- b) job applicants, staff members, volunteers and contractors:
- i. name, contact details (including next of kin), date of birth, and religion;
 - ii. information on job application;
 - iii. professional development history;
 - iv. salary and payment information, including superannuation details;
 - v. medical information (e.g. details of disability and/or allergies, and medical certificates); o complaint records and investigation reports;
 - vi. leave details;
 - vii. photos and videos at school events;
 - viii. workplace surveillance information;
 - ix. work emails and private emails (when using work email address) and Internet browsing history
- c) 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 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.

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 an educational program for the pupil, 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 pupil and the needs of The School throughout the whole period the pupil is enrolled at the School.

The purposes for which the School uses personal information of students and parents include:

- a) to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- b) day-to-day administration of the School;
- c) looking after students' educational, social and medical well-being;
- d) seeking donations and marketing for the School; and
- e) 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 pupil or parent, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity.

On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. The School will obtain permissions from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet.

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:

- a) in administering the individual's employment or contract, as the case may be;
- b) for insurance purposes;
- c) seeking donations and marketing for the School; and
- d) 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 parents and friends or old scholar associations, to enable the School and the volunteers to work together.

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 Parents and Friends Association.

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. If you would like to opt-out of direct marketing, please contact our Communications Manager via email at (marketing@ccps.qld.edu.au).

Disclosure of personal information

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

- a) another School;
- b) government departments;
- c) medical practitioners;
- d) people providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- e) recipients of School electronic and print publications, such as newsletters and magazines;
- f) parents or guardians;
- g) anyone you authorise the School to disclose information to; and
- h) anyone to whom we are required to disclose the information to by law.

Sending and storing information overseas

- a) Caloundra City Private School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Caloundra City Private School will not send personal information about an individual outside Australia without:
 - i. obtaining the consent of the individual (in some cases this consent will be implied);
 - ii. otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

How the school treats 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 preferences or criminal record, and health 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.

Data breaches

It will be deemed that an 'eligible data breach' has occurred if:

- a) there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals; (**the affected individuals**)
- b) a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result;
- c) the information is lost in circumstances where:
 - i. unauthorised access to, or unauthorised disclosure of, the information is likely to occur;
 - ii. assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

Response of the School in the event of an 'eligible data breach'

If the School suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then the School will be required to lodge a statement to the Privacy Commissioner (**Commissioner**). Where practical to do so, the School will also notify the affected individuals. If it is not practicable to notify the affected individuals, the School will publish a copy of the statement on its website, or it in another reasonable manner. The Data Breach Executive is the Principal (scuthbert@ccps.qld.edu.au).

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- a) there is no authorised access to, or unauthorised disclosure of, the information
- b) there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

Access and correction of personal information

Under the *Commonwealth Privacy 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 and correction themselves. There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or update any personal information the School holds about you and/or your child, please contact the Administration & International Students Officer, Cheryl McGregor (cmcgregor@ccps.qld.edu.au) 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 refusal. The School will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

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 pupil to the pupil's parents. The School will treat consent given by parents as consent given on behalf of the pupil and notice to parents will act as notice given to the pupil.

As mentioned above, parents may seek access to personal information held by the School about them or their child by contacting the 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 pupil.

The School may, at its discretion, on the request of a pupil, grant that pupil access to information held by the School about them, or allow a pupil 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 pupil and/or the pupil's personal circumstances warranted it.

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 Principal (scuthbert@ccps.qld.edu.au). 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.

Policy Responsibility: School Governing Body

Review Date: June 2020

Next Review Date: June 2022

APPENDIX 1

Standard Collection Notice

- a) Caloundra City Private School (the School) is bound by the National Privacy Principles contained in the *Commonwealth Privacy Act*.
- b) The School collects personal information, including sensitive information about children and parents or guardians before and during the course of a child's enrolment at the School. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the School to provide schooling to students enrolled at the School, exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School.
- c) Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
- d) Laws and regulations governing or relating to the operation of the School require certain information to be collected and disclosed. These include relevant Education and Accreditation Acts, and Public Health and Child Protection laws.
- e) Health information about children is sensitive information within the terms of the Australian Privacy Principles (APP) under the Privacy Act. We may ask you to provide medical reports about your child from time to time.
- f) The School from time to time discloses personal and sensitive information to others for administrative and educational purposes, including facilitating the transfer of a child to another school. This also includes government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, coaches, tutors, advisors, volunteers and counsellors;
 - i. providers of learning and assessment tools;
 - ii. 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);
 - iii. people providing administrative and financial services to the School;
 - iv. anyone you authorise the School to disclose information to; and
 - v. anyone to whom the School is required or authorised by law, including child protection laws, to disclose the information.
- g) Personal information collected from children is regularly disclosed to their parents or guardians.
- h) 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 reside on a cloud service provider's server which may be situated outside Australia. The School makes every reasonable attempt to ensure these services comply with the Privacy Principles in the Act.
- i) The School's Privacy Policy also sets out how you may complain about a breach of privacy and how The School will deal with such a complaint.

- j) The School, from time to time, engages in fundraising activities. Information received from you may be used to make an appeal to you. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
- k) On occasions information such as achievements, activities and news is published electronically and in print on campus, newsletters, and magazines and on our website. Photographs of children in activities and excursions may be taken for publication in classwork, newsletters, magazines and on our website; the School will obtain permissions from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet.
- l) On enrolment, the School will obtain permission from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet. A student's parent or guardian will notify the School (in writing) if they decide to withdraw this consent.
- m) We may include parents' contact details in a class list and directory after obtaining specific permission.
- n) If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to The School and why, that they can access that information if they wish and that The School does not usually disclose this information to third parties.
- o) The School's Privacy Policy, located on the School website, sets out how parents or children may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the child, or where the child has provided information in confidence; any refusal will be notified in writing with reasons if appropriate.

Any issue you may have concerning privacy and the School can be addressed to the Principal on 07 5437 5800 or email scuthbert@ccps.qld.edu.au

APPENDIX 2

Alumni Association Collection Notice

- a) We may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of Caloundra City Private School and to keep alumni members informed about other members.
- b) We must have the information referred to above to enable us to continue your membership of the Alumni Association.
- c) As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by [name of School] to assist in its fundraising activities. If you do not agree to this, please advise us now.
- d) We may publish details about you in our relevant school publications and the School's website. If you do not agree to this, you must advise us now.
- e) The School's Privacy Policy, accessible on the School's website, contains details of how you may seek access to and correction of your personal information which the School has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
- f) 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 email services. 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 reside on a cloud service provider's server which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
- g) If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.
- h) The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.

Any issue you may have concerning privacy and the School can be addressed to the Principal on 07 5437 5800 or email scuthbert@ccps.qld.edu.au

APPENDIX 3

Employment Collection Notice

- a) In applying for this position, you will be providing Caloundra City Private School with personal information.
- b) If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
- c) We will not disclose this information to a third party without your consent unless otherwise permitted.
- d) We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.
- e) 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 email services. 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 reside on a cloud service provider's server which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
- f) If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.
- g) The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.

Any issue you may have concerning privacy and the School can be addressed to the Principal on 07 5437 5800 or email scuthbert@ccps.qld.edu.au

APPENDIX 4

Contractor/Volunteer Collection Notice

- a) In offering, applying or agreeing to provide services to the School, you will be providing Caloundra City Private School with personal information.
- b) If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
- c) You agree that we may store this information for the duration of the recruitment process, agreed period of the contract or duration of volunteer work.
- d) We will not disclose this information to a third party without your consent unless otherwise permitted to.
- e) We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.
- f) 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 reside on a cloud service provider's server which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
- g) If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.
- h) The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.

Any issue you may have concerning privacy and the School can be addressed to the Principal on 07 5437 5800 or email I@ccps.qld.edu.au