

SYDNEY GRAMMAR SCHOOL



Privacy Policy: March 2014

1 Sydney Grammar School is committed to meeting its obligations under the *Australian Privacy Act 1988* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. It acknowledges the application of the Australian Privacy Principles (APPs) as set out in the latter.

2 In accordance with statutory requirements, the School has adopted this Policy concerning the management of personal information. The Policy is posted on the School's website and may be requested in printed form. The Policy provides as follows:-

2.1 The School collects personal information, including health and other sensitive information, about pupils and parents before and during the course of a pupil's enrolment at the School. The primary purpose of collecting this information is to enable the School to provide schooling for its pupils, and to meet its obligations to them and their parents and to meet their relevant needs and those of their parents as well as to meet other binding obligations. A Collection Notice is attached to the School's Application for Enrolment and Admission Form. Personal information is collected by means such as forms, interviews, emails, telephone calls and meetings. Sometimes personal information is collected from persons other than parents and pupils.

2.2 Personal information of pupils and parents is used for purposes which include the following: keeping parents informed through reports, correspondence, newsletters and other publications; School administration; care of pupils' welfare (particularly in regard to educational, safety and health); meeting legal obligations; seeking donations and marketing for the School. In some cases if information requested is not provided, it may not be possible to enrol or continue the enrolment of a prospective or actual pupil or permit a pupil to take part in a particular activity.

2.3 Personal information collected under 2.1 above includes (without limitation):

- names, addresses and contact details
- health information needed to enable the School to care properly for its pupils
- information about the academic performance and extracurricular activities of pupils

3 Personal information is also collected from contractors supplying goods and services to the School as far as is necessary to enable such supply to occur and to effect proper arrangement such as insurance and to meet legal obligation such as Work Health and Safety obligations.

4 Personal information about other persons with whom the School has lawful dealings, such as representatives of government authorities, is collected to enable such dealings to occur.

5 Personal information is collected about prospective pupils, parents, employees, contractors and volunteers in order to facilitate consideration of potential engagement with the School. Under the Commonwealth Privacy Act and the Health Records and Information Privacy Act 2002 (NSW), the Australian Privacy Principles do not apply to an employee record and this Policy does not apply to the treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and an employee. Personal information concerning job applicants, employees and contractors is used to manage employment and contacts and to meet legal obligations such as obligations relative to child protection legislation. It may also be used to seek donations for the School. Personal information is collected from volunteers and used to help the volunteer work with the School. In most or all cases volunteers at the School are parents of its pupils.

6 Personal information held by the School may be used to seek donations or other support and may be disclosed on a confidential basis to organisations that assist in fundraising. Recipients or potential recipients of requests for support may opt out of receiving them.

7 Personal information is collected as far as practicable from the person whom it concerns. However, in the context of a school, information concerning pupils may be collected from parents and in some cases information concerning parents or other relatives/emergency contact persons may be collected from pupils or parents in order to assist the School to meet its obligations to its pupils and to meet their needs. Personal information may be provided by other persons, such as a medical practitioner or someone holding a position in another school.

8 Personal information held by the School about an individual, including sensitive information, may be disclosed to: another school; a government department or authority; medical practitioners or hospital staff; people providing services to the School, including visiting teachers (such as music instructors) and sports coaches and physiotherapists or other persons who assist at sports matches and training; recipients of School publications; parents; persons or authorities to which the School is legally obliged to provide information; and persons or organisations in respect of which the

individual (or in the case of pupil, his parent) has given consent for the provision of the information.

9 Sensitive information (information that is also personal information relating to an individual's racial or ethnic origin, political opinions, religion, trade union or professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, as well as health and biometric information) will only be used and disclosed for the purpose for which it was provided or a directly related secondary purpose, except in cases where consent has been given or the use or disclosure is required or permitted by law.

10 Information is held as appropriate in the School's electronic records, which are maintained securely and with controlled access, including use of passwords, or in paper files held securely by the appropriate person. Confidentiality and security are important and staff are required to observe them.

11 Individuals may request information about any personal information held in relation to them by contacting the Senior Master at College Street (by calling the School on 9332 5800 or sending a message to wjk@sydgram.nsw.edu.au.) If any personal information is held about them, they will be given access to it unless there is a relevant exception, such as the need to preserve the privacy of others, to protect a confidential investigation or privileged information or to adhere to a requirement of law, or any other valid exception under APP 12. In general a pupil's parents may request access to personal information held about the pupil but in some cases access may be sought by the pupil or the pupil may ask the School to deny access to a parent. These cases will generally involve older pupils.

12 Individuals may also contact the Senior Master at College Street to complain about any breach of Australian Privacy Principles. In the event that such a complaint is received, the Senior Master will investigate and respond as quickly as practicable to the complainant, setting out or acknowledging the facts as far as possible and where appropriate arranging or recommending to the Headmaster an appropriate form of rectification, such as apology, alteration of a record, notification of error to another person or authority, or other. If the complainant is dissatisfied with the response of the Senior Master, he or she may contact the Headmaster of Sydney Grammar School, and if still dissatisfied, may write to the Chairman of Trustees of the School. If necessary individuals may be required to verify their identity and specify further the information to which they seek access.

13 The School does not normally disclose personal information it has collected to overseas recipients. However, it does so in the course of arranging school tours and exchanges, such as sports tours, music tours, history tours and language exchanges. Pupils participate in such tours and exchanges voluntarily and with parental consent.

On some occasions the School provides, with the consent of pupils or former pupils, personal information to overseas universities or employers or other institutions or persons with which or whom the pupil or former pupil wishes to establish a connection. In the case of sports tours, such countries would include Britain and other European countries, New Zealand, Japan and North and South American countries; in the case of music tours, New Zealand, European countries and North America; in the case of history tours, European countries and Turkey; in the case of language tours, France, Germany, Switzerland, Italy, China and Japan. The School also undertakes Kokoda Track walks in Papua New Guinea. The School may also store information by way of cloud computing, in which case it may be stored on servers outside Australia.