



Privacy Policy

2024

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1.		2014		
2.	September 2024	August 2024	Full review	JM & Policies sub-committee

Introduction

This Policy describes how Yallingup Steiner School manages personal information and People's rights in relation to their personal information.

The school is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 (Privacy 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 ensure it remains appropriate to the changing school environment.

Types of Personal Information Collected

The types of information the school collects include (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 and previous school;
- parents' education, occupation, language spoken at home, nationality and country of birth;
- health information (e.g., details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports and names of doctors);
- results of assignments, tests and examinations;
- conduct and complaint records, or other behaviour notes, and school reports;
- information about referrals to government welfare agencies;
- counselling reports;
- health fund details and Medicare number;
- any Family Court orders;
- criminal records;
- volunteering information; and
- photos and videos at School events;

Information about staff and job applicants, 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;
- health 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; and work emails and private emails (when using work email address) and Internet browsing history; and

Information about 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.

Related Documents

- Grievance Policy
- Induction Policy
- Enrolment Policy

Scope

This policy applies to all employees of the Yallingup Steiner School

How Personal Information is Collected

a. Directly: The school generally collects personal information about an individual directly from the individual (or their Parent in the case of students). This includes by way of forms, face-to-face meetings and interviews, emails and telephone calls.

b. Indirectly: 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, a reference from another school or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

c. Other Sources: We may also collect personal information through surveillance activities (such as CCTV security cameras).

Purposes for which Personal Information is Collected, Used and Disclosed

The purposes for which the school collects, uses and discloses personal information depend on the school's relationship with the individual and include:

Students and parents:

- providing education and school activities;
- satisfying the needs of parents, students and the school throughout the period a student is enrolled at the school;
- making required reports to government authorities;
- keeping parents informed about matters related to their child's schooling, through correspondence, apps and newsletters;
- day-to-day administration of the School;

- Managing students' educational, social and health wellbeing;
- seeking donations for the school (see the 'Fundraising' section of this Privacy Policy); and
- to satisfy the school's legal obligations and allow the school to discharge its duty of care.

Volunteers:

- to contact and administer volunteer positions;
- for insurance purposes; and
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

Job applicants, employees and contractors:

- assessing and (if successful) engaging the applicant or contractor;
- administering an individual's employment or contract;
- seeking donations for the School (see the 'Fundraising' section of this Privacy Policy);
- for insurance purposes; and
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

Who Personal Information is Disclosed to

The school may disclose personal information, including sensitive information, for educational, care and administrative purposes, and to seek support and advice. This may include to:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
- government departments (including for policy and funding purposes);
- agencies and organisations to whom the school is required to disclose personal information for education, funding and research purposes;
- people providing administrative and financial services to the school;
- the provider of our information management and storage system and other information technology services;
- recipients of school publications, such as newsletters and magazines;
- students' parents or guardians;
- anyone that parents / guardians, staff, volunteers, job applicants or volunteers authorise the School to disclose information to;
- anyone to whom the School are required or authorised to disclose the information to by law, including child protection laws;
- medical practitioners;
- people providing educational support and health services to the school, including specialist visiting teachers, coaches, volunteers, and counsellors;
- organisations that assist with fundraising (see the 'Fundraising' section of this Privacy Policy);

- providers of specialist advisory services and assistance to the School, including those in the area of human resources, child protection, students with additional needs and for the purpose of administering Google Apps for Education and ensuring its proper use (see further the section below, “Sending and storing information overseas”);
- 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)

How Personal Information is Stored

- The school stores personal information in hard copy and electronically. Information management and storage systems provided by third party service providers are used. Personal information is stored with and accessible by the third-party service providers for the purpose of providing services to the school in connection with the systems.
- 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. See further the section below ‘Sending and Storing Information Overseas.’

Sending and Storing Information Overseas

The school may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate a school exchange.

- 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 and provide technical support. 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. An example of such a cloud service provider is Google. Google provides the ‘Google Apps for Education’ (GAFE) including Gmail, and stores and processes limited personal information for this purpose.
- School personnel and AISWA and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g., instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.

Fundraising

The school treats 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 may be used to

make an appeal to individuals. It may also be disclosed to organisations that assist in the school's fundraising activities.

Security of Personal Information

The school takes 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:

- restricting access to information on the school databases on a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- locked storage of paper records and password access rights to computerised records.
- Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need-to-know basis.
- Implementing physical security measures around the school buildings and grounds to prevent break-ins.
- implementing ICT (information and Communications Technology) security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Access and Correction of personal Information

Under the Commonwealth Privacy Act an individual has the right to seek access to, and/or correction of, any personal information which the school holds about them. There are some exceptions to these rights set out in the applicable legislation.

Requests to access, update or correct any personal information about parents/guardians and students the school holds must be made to the school Executive.

Applicants may be required to provide proof of identity and to specify information required.

If the request is refused the school will provide a written notice explaining the reasons for refusal (unless, considering the grounds for refusing, it would be unreasonable to provide reasons).

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/Guardians. Generally, 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/Guardians may seek access to personal information held by the school about them or their child by contacting the Executive, by telephone or in writing (details in the section above 'Access and correction of personal information'). However, there may be occasions when access is denied. Such occasions may include (but are not limited to) 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 a student.

Enquiries and Complaints

If individuals 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 Act, they may utilise the school Grievance policy and its procedure, posted on the school website. The school will investigate any complaint and will communicate decisions made in relation to a complaint as soon as is practicable after it has been made.

If complainants are not satisfied, complaints may be made to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.