



# Shire Christian School Privacy Policy

## 1. Basis

This Privacy Policy sets out how the Shire Christian School (the **School**) manages personal information provided to or collected by it.

This Privacy Policy describes how we comply with the Australian Privacy Principles contained in the Privacy Act and the Health Records and Information Privacy Act. The Privacy Policy also describes:

- the types of personal information we collect;
- the purposes for which your personal information is collected, held, used and disclosed;
- how you can gain access to your personal information; and
- how you may complain or inquire about our collection, handling, use or disclosure of your personal information.

In order to reflect statutory requirements, technology and changes to the School's operations and practices, the School may, from time to time, update this Privacy Policy.

## 2. What kind of personal information does the school collect?

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

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

### Exception in relation to employee records

Pursuant to the Privacy Act, the National Privacy Principles do not apply to an employee record. 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 the School and employee.

### **3. How the school collects personal information**

How the School collects personal information will generally depend upon whose information the School is collecting. Where both reasonable and practical, the School will collect personal information directly from the student and/or their parent/guardian.

#### **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, interviews, emails and telephone calls. On occasions people other than parents and students provide personal information. The School may also collect personal information through financial transactions, photographs, digital images, videos/DVD's and surveillance activities, such as through the use of CCTV security cameras and email monitoring.

#### **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 professional or a reference from another School.

### **4. How the school uses personal information**

The School will use personal information it collects from you for the primary purpose of enabling the School to provide schooling to the student or for a purpose that is reasonably necessary for one or more of our functions or activities and for such other secondary purposes that are related to the purpose of collection and reasonably expected, or to which you have consented.

#### **Students and parents/guardians:**

With respect to personal information regarding students and parents/guardians, the primary purpose of the School's collection is to enable the School to provide schooling for the student. This includes satisfying the needs of parents/guardians, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School. The purposes for which the School may use personal information of students and parents/guardians include:

- to keep parents/guardians informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of the School;
- attending to a student's educational, social, emotional and medical wellbeing;
- seeking donations and marketing for the School, including marketing, promotional and fundraising activities;
- supporting the activities of School associations and maintaining contact with former students through student unions; and
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

Where the School requests personal information about a student and/or parent/guardian and the information requested is not provided to the School, in some cases the School may

not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

#### **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:

- administering the individual's employment or contract;
- for insurance purposes;
- seeking donations and marketing for the School; and
- 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 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. Parents/guardians, staff, contractors and other members of the wider School community may, from time to time, receive fundraising information. In addition, school publications, such as newsletters and magazines, which may include personal information, may be used by the School for marketing purposes.

The School also retains personal information regarding past students, parents/guardians and staff in the Schools archives, which may be used for the purposes described in this Privacy Policy

### **5. Disclosure of personal information**

The School may disclose personal information and sensitive information, held by the School about an individual to:

- another school;
- government departments;
- medical practitioners;
- people providing services to the School, including specialist visiting teachers, sports coaches, volunteers and counsellors;
- recipients of the School's publications, such as newsletters and magazines;

- parents;
- consultants;
- anyone you authorise the School to disclose personal information to;
- anyone you would reasonably expect us to disclose your personal information to;
- anyone to whom we are required to disclose the information by law; and
- anyone to whom such disclosure would lessen or prevent a serious threat to life, health or safety of an individual or public safety.
- external auditors engaged by the School for financial, compliance, or operational audits, who may require access to personal information to perform their functions.

The School may also send personal information and sensitive information (which has been "de-identified") to the Independent Schools of NSW for the purpose of accessing Commonwealth funding and support services.

### **Sensitive Information**

For the purpose of this Privacy Policy, 'sensitive information', shall mean personal information which is information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, health, sexual preference or criminal record. 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, or required, by law.

### **Sending Information Overseas**

The School may disclose personal information about an individual to overseas recipients, for example, when storing personal information with 'cloud' service providers who are situated outside Australia or to facilitate a school exchange. This includes circumstances where external auditors use offshore data centres, cloud-based platforms, or AI-enabled analytical tools as part of their audit methodology. Where such tools or services involve overseas processing, the School will ensure compliance with the Australian Privacy Principles. However, the School will not send personal information about an individual outside Australia unless the School:

- has obtained the consent of the individual (this may include implied consent);
- has satisfied themselves that the overseas recipient is compliant with the Australian Privacy Principles or a similar privacy regime; or
- is otherwise complying with applicable privacy legislation.

### **Automated tools and AI**

Some service providers engaged by the School, including auditors, may use automated systems or AI-based tools to analyse information. These tools are used solely for audit and assurance purposes and operate under contractual privacy and security obligations consistent with the Australian Privacy Principles.

## **6. Management and security of personal information**

The School will respect the confidentiality of students and parents/guardians personal information and the privacy of individuals. The School shall take all reasonable steps to protect the personal information that the School holds about you or your child from misuse, loss, unauthorised access, modification or disclosure.

The School may store personal information in a variety of formats including on but not limited to electronic databases, hard copy files and on personal devices such as laptop computers, mobile phones, cameras and other recording devices.

## **7. Ensuring the quality of personal information**

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date and will take all reasonable steps to do so. The School will maintain and update personal information when the School is advised or when the School becomes aware through other means that an individual's personal information has changed.

A person may seek to update their personal information held by the School at any time. The National Privacy Principles require the School not to store personal information longer than necessary.

## **8. Accessing and correcting personal information**

Pursuant to the Privacy Act and Health Records and Information 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.

To make a request to access any personal information the School holds about you or your child, please contact the School 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.

However, there will be occasions when access to your personal information is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, where the release may result in a breach of the School's duty of care to the student or where the student has provided such information in confidence. If the School cannot provide you with access to your personal information, the School will provide you with written notice explaining the reasons for refusal.

## **9. Consent**

The School will treat consent given by a parent/guardian as consent given on behalf of the student and notice to a parent/guardian will act as notice given to the student.

However, the School may, at its discretion, on the request of a student grant that student access to information held by the School about them or allow a student to give or withhold consent to the use of their personal information, independently of their parents. Generally, this would be done only when the maturity of the student and/or the student's personal circumstances so warranted.

#### **10. Enquiries and Complaints**

If you would like further information about the way the School manages the personal information it holds or wish to make a complaint, please write to the principal. 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.