



PRIVACY POLICY & PROCEDURES

Last reviewed: June 2023

Next review date: June 2024 by Privacy Officer

INTRODUCTION

This document outlines the school's policy on how your personal information is collected, used, managed and disclosed. The school is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act (1988), as amended 17 December 2022, and considers your privacy important. The school may, from time to time, review and update this Policy to take account of new laws and technology or to fit in with changes to the school's operations and practices so as to remain appropriate to the changing school environment.

EMPLOYEE RECORDS

Employment records for past and present staff are exempt from the Privacy Act. However, where State or Territory health privacy legislation applies, we are still required to protect the privacy of employee health information. This Policy will apply in those circumstances.

WHAT IS PERSONAL INFORMATION?

Personal information is information or an opinion, whether true or not, whether recorded in a material form or not, about an individual who is identified or reasonably identifiable from the information.

Sensitive Information

This is a subset of personal information that is generally given a higher level of privacy protection. Sensitive information is 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 a criminal record and health information. We only collect sensitive information where it is reasonably necessary for our functions or activities and either the individual has consented, or we are required or authorised by or under law to do so. For example, we collect health information for students in order to look after the student's emotional, social, medical and educational well-being.

Sensitive information will only be used or disclosed for the purpose for which it was provided or a directly related secondary purpose unless you object or unless the use or disclosure of the sensitive information is allowed by law.

Unsolicited Personal Information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect, such as an employment application sent to us by an individual on their own

Personal information held by the school may be disclosed to an organisation that assists in the school's fundraising.

Where you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time by:

- contacting us either via the contact details provided on the communication received or via the details at the end of this Policy;
- advising us if you receive a marketing call that you no longer wish to receive these calls; or

SENDING INFORMATION OVERSEAS

We may disclose personal information to parties located overseas in the following situations:

- Parents and guardians of students who live overseas, including host families for students on exchange.
- Fideliter, News Link and Almerita will continue to be provided to overseas students and families, as will promotional material including, but not limited to the Prospectus.
- Promotional material will be posted on the school's social media accounts including but not limited to Instagram, YouTube, Twitter and Facebook by the marketing team. Otherwise, staff members are not permitted to copy any personal information about anyone in the school community to any social media sites.
- The school will use cloud-based services that require some personal information to be sent to data centres external to Australia. Only organisations that have similar regulatory requirements to that of the Commonwealth Privacy Act are used. One such example is an email service that sends bulk email to our parents. In this situation, only the parents' names and email addresses are uploaded. No information is provided that is irrelevant to the operation.
- Individual staff will also use cloud-based services as part of the day-to-day management or assessment of the students in their care. Examples of such services include Microsoft 365, DropBox, Google Docs and those integrated in mobile phone and tablets.

HOW DO WE COLLECT PERSONAL INFORMATION?

When we collect personal information about you, we will take reasonable steps to outline why we are collecting the information, whether it will be shared and, if it is shared, with whom.

We collect personal information in a number of ways, including but not limited to:

- in person, eg at information mornings or through the school administration;
- St Mary's websites;
- over the telephone;
- face-to-face meetings;
- through hard copy and electronic correspondence, such as letters, faxes and emails;
- forms, both hard copy and electronic, eg enrolment applications;
- security cameras; and
- third parties, including doctors and other health professionals.

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 photograph from the school-appointed photographer. When provided with unsolicited personal information, this information will be either kept, destroyed or de-identified as described under Unsolicited personal information.

COLLECTION OF INFORMATION THROUGH OUR WEBSITES

When you visit the St Mary's websites, some information is collected that identifies when you visited the website, for what length of time, what pages or resources you accessed and the type of device you were using. None of this is personal information that can identify you. We analyse this data to improve the usability of our website.

However, if you access a school website that requires you to authenticate with credentials provided by the school, we can identify you.

While we have security appliances and practices in place to protect the users of our websites, we cannot guarantee the security of any information you may disclose online, and you provide this information at your own risk. If you prefer not to use a school website to provide information to the school, you may use an alternative method such as speaking directly with the appropriate St Mary's staff.

WHAT IF YOU DO NOT PROVIDE US WITH YOUR PERSONAL INFORMATION?

We will provide individuals with the option of not identifying themselves or of using a pseudonym when dealing with us if it is lawful and practicable to do so.

In some cases, however, if you do not provide us with your personal information when requested, we may not be able to provide you with the product or service that you are seeking. If the school requests personal information about a student or parent that parents are unwilling to provide, the school may not be able to enrol or continue the enrolment of a student.

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 request for consent and notices in relation to the personal information of a student to the student's parents or guardians. The school will treat consent given by parents or guardians as consent given on behalf of the student and notice to parents or guardians will serve as notice given to the student.

Individuals may seek access to personal information held by the school about them or their child by contacting the Privacy Officer. However, there will be occasions when access is denied, ie when release of the information would have an unreasonable impact on the privacy of others or when the release may result in a breach of the school's duty of care to the student.

Before releasing information, the school may require you to verify your identity and specify the 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.

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 or guardians. This would normally be done only when the student involved has reached 18 years of age, but the school could do so in other circumstances when the maturity of the student and/or the student's personal circumstances so warranted.

COMPLAINTS

If you have a complaint about how we have collected or handled your personal information, please contact our Privacy Officer (details below). Our Privacy Officer will endeavour, in the first instance, to deal with your complaint and take any steps necessary to resolve the matter in a timely manner.

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner or, in some instances, other regulatory bodies, such as the Australian Communications and Media Authority.

CONTACT DETAILS

Please contact the school if you have any queries about the personal information that St Mary's holds or the way that we handle your personal information.

Postal Address:

Privacy Officer
St Mary's Anglican Girls' School
PO Box 105
Karrinyup WA 6921

Email:

privacy@stmarys.wa.edu.au

Telephone:

+61 8 9341 9111

Additional general information about privacy is available on the website of the Office of the Australian Information Commissioner at www.oaic.gov.au or by calling the OAIC's enquiry line at 1300 363 002.