



CVAS
Clarence Valley
ANGLICAN SCHOOL

Privacy Policy

Privacy Policy

Privacy Policy		
Policy Last Review October 2021	Review Date and Frequency Every two years	Responsible for Review Business Manager
Recommended By School Executive	Approved By School Council	Approval Date 26 October 2021

INTRODUCTION

Clarence Valley Anglican School ("the School") is bound by the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)*. In relation to health records, the School is bound by the New South Wales Health Privacy Principles which are contained in the *Health Records and Information Privacy Act 2002 (NSW)*.

This privacy policy outlines how the School manages all personal information provided or collected.

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.

WHAT KINDS OF PERSONAL INFORMATION DOES THE SCHOOL COLLECT AND HOW DOES THE SCHOOL COLLECT IT?

The type of information the School collects and holds includes (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
- Job applicants, staff members, volunteers and contractors
- Other people who come into contact with the School

Personal information that you provide

The School will generally collect personal information held about an individual by way of forms, face-to-face meetings and interviews, emails and telephone calls. On occasions, third parties may provide personal information.

Personal information provided by other people

In some circumstances the School may be provided with personal information about an individual from a third party e.g. a report provided by a medical professional or a reference from another school.

Exception in relation to employee records

Under the *Privacy Act 1988 (Cth)*, the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)* and the *Health Records and Information Privacy Act 2002 (NSW)* the Australian Privacy Principles and New South Wales Health 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.

HOW WILL THE SCHOOL USE THE PERSONAL INFORMATION YOU PROVIDE?

The School will use personal information it collects from you for the primary purpose of collection and for such other related purposes and are reasonably expected by you or to which you have consented.

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 schooling for the student. This includes satisfying the needs of parents, 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 uses personal information of students and parents include:

- To keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- Day-to-day administration of the School
- Looking after students' educational, social and medical wellbeing
- Seeking donations and marketing for the School
- 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 student or parent, if the information requested is not provided, 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 and contractors

In relation to personal information of job applicants and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be.

The purposes for which the School uses the personal information of job applicants and contractors include:

- In administering the individual's employment or contract, as the case may be
- For insurance purposes
- Seeking donations and marketing for the School
- 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 who 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 be a quality-learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to an organisation that assists in the School's fundraising (e.g. the School's Foundation or alumni organisation as and when constituted or, on occasions, external fundraising organisations).

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications such as newsletters and magazines, which include personal information, may be used for marketing purposes.

WHO MAY THE SCHOOL DISCLOSE PERSONAL INFORMATION TO AND STORE AN INDIVIDUAL'S PERSONAL INFORMATION WITH?

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

- Another school
- Government departments or medical practitioners
- People providing services to the School, including specialist visiting teachers, counsellors and sports coaches
- Recipients of School publications like newsletters and magazines
- Parents and anyone to whom you have authorised the School to disclose information
- Anyone to whom the School is required to disclose information by law

Sending and storing information overseas

The School may disclose personal information about an individual to overseas recipients, for instance, to a school exchange. However, the School will not send personal information about an individual outside Australia without:

- Obtaining the consent of the individual (in some cases this consent will be implied)
- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation

The School may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

HOW DOES THE SCHOOL TREAT SENSITIVE INFORMATION?

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

Management and security of personal information

School 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, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password protected access to computerised records.

Access to and correction of personal information

Under the *Privacy Act 1988 (Cth)*, the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)* and the *Health Records and Information Privacy Act 2002 (NSW)* 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.

Requests from an individual to access or update any personal information that the School holds about that individual or their child should be directed to the Principal in writing. The School may require the requesting individual to verify their identity and specify what information is required. The School may charge a fee to cover the cost of verifying the requesting individual's 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 the School cannot provide access to the information, the School will provide the applicant with written notice explaining the reason(s) for refusal.

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. 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. 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 student.

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

ENQUIRIES AND COMPLAINTS

Further information about the way the School manages the personal information it holds or to complain that it is believed the School has breached the Australian Privacy Principles please contact the Principal in writing. The School will investigate any complaint and will notify you of a decision in relation to the complaint as soon as is practicable after it has been received.

RELATED DOCUMENTS

- *Cyber Risk Plan*
- *Data Breach Policy*
- *Enrolment Policy*
- *Electronic Data Backup and Retention Policy*
- *Gender Diverse, Transgender and Intersex Students Policy*
- *Grievance and Disputes (Staff) Policy*
- *ICT Network and Internet Policy*
- *Medication Policy*
- *Recording of Marks Policy*
- *School Community Code of Conduct Policy*
- *School Community Complaints Policy*
- *Staff Code of Conduct Policy*
- *Staff Social Networking Policy*

- *Student Attendance Policy*
- *Student Code of Conduct Policy*
- *Suspension and Expulsion of Students Policy*
- *Volunteer and Contractor Code of Conduct Policy*