

## **PRIVACY POLICY**

### **INTRODUCTION**

Walford Anglican School for Girls acts in accordance with the Australian Privacy Principles contained in Schedule 1 of the *Privacy Act 1988 (Cth)* (the Act) when collecting, using, managing and retaining personal information.

The School may, from time to time, review and update this Privacy Policy to take into account new laws and technologies, changes to the School's operations and practices, and to make sure it remains appropriate to changes in the School environment.

### **SCOPE**

All students, old scholars, parents (before, during and after the course of a student's enrolment at the School), job applicants, staff (past and present), volunteers, contractors, and community members are covered by this policy, and all events and activities conducted by the School or those attended as representatives of the School, whether on or off site.

### **PURPOSE**

This policy:

- Describes how Walford collects, uses and manages personal information that is provided to it, and for what purposes.
- Outlines how an individual may make a complaint about a privacy breach.
- Guides Walford staff on the standards to be applied in respect of handling personal information and ensures consistency in the School's approach to privacy.

### **AUSTRALIAN PRIVACY PRINCIPLES**

Thirteen Australian Privacy Principles (APPs) apply to Australian organisations and Australian Government (and Norfolk Island Government) agencies. The APPs set minimum standards that relate to the collection, security, storage, use, correction and disclosure of personal information and access to that information.

- APP 1: Open and transparent management of personal information
- APP 2: Anonymity and pseudonymity
- APP 3: Collection of solicited personal information
- APP 4: Dealing with unsolicited information
- APP 5: Notification of the collection of personal information
- APP 6: Use or disclosure of personal information
- APP 7: Direct marketing
- APP 8: Cross-border disclosure of personal information
- APP 9: Adoption, use or disclosure of personal information
- APP 10: Quality of personal information
- APP 11: Security of personal information

APP 12: Access to personal information

APP 13: Correction of personal information

## **DEFINITIONS**

The Act covers the following types of information.

Personal Information – means information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not, and whether the information is recorded in a material form or not. It includes all personal information regardless of its source. Personal information does not include information that has been de-identified so that the individual is no longer identifiable.

Sensitive Information - means a type of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information and biometric information about an individual.

Health Information – is a subset of sensitive information and means any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided to an individual currently or in the future. Health information also includes personal information collected in the course of providing a health service.

## **TYPES OF PERSONAL INFORMATION COLLECTED**

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 caregivers ('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, previous school and religion;
  - parents' education, occupation and language background;
  - medical information (e.g. details of disability and/or allergies, absence notes, 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 court orders;
  - volunteering information; and
  - photos and videos at School events.
  
- job applicants, staff members, 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;
  - medical 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.
- 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.

#### Personal Information you provide

The School will generally collect personal information held about an individual directly from that individual by way of forms filled out by parents or students, face-to-face meetings and interviews, on-line surveys, emails and telephone calls. On occasions people other than parents and students 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, for example a report provided by a medical professional or a reference from another school.

#### Exception in relation to employee records

Under the Privacy Act the APPs 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.

#### **Use of Personal Information**

The School will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and 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 to students enrolled at the School, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all activities of the School. 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; and
- 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 personal information of job applicants and contractors include:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the School; and
- to satisfy the School's legal and legislative 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, such as The Walford Old Scholars' Association, 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, for example, the Walford Parent Teacher Association and the Walford Foundation.

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

If you do not wish to receive direct marketing communications from the School, please advise the Marketing and Community Engagement Office.

## **DISCLOSURE OF PERSONAL INFORMATION**

The School may disclose personal, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those other schools;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the School, including but not limited to specialist visiting teachers, volunteers, counsellors and coaches;
- providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection and students with additional needs;
- 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);
- 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;
- recipients of School publications, such as newsletters, magazines and the Yearbook;
- students' parents or caregivers;

- anyone you authorise the School to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

#### Sending information overseas

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

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

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. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

An example of such a cloud service provider is Microsoft. Microsoft provides 'Office 365', and stores and processes limited personal information for this purpose. School personnel 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 'Office 365' and ensuring its proper use.

#### **TREATMENT OF 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 you agree otherwise, or the use or disclosure of the sensitive information is required or allowed by law.

#### **MANAGEMENT AND SECURITY OF PERSONAL INFORMATION**

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

#### **ACCESS AND CORRECTION OF PERSONAL INFORMATION**

Under the Act an individual has the right to obtain access to any personal information that 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.

To make a request to access or update any personal information the School holds about you or your child, please contact the Principal or the Director of Corporate Services 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.

The School will respond to all requests for access or correction within a reasonable time. There may be occasions when access may be denied. Such occasions would include where release of the information might 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 an individual. If we cannot provide you with access to the information, we will provide you with written notice explaining the reasons 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.

Parents may seek access to personal information held by the School about them or their child by contacting the Principal or the Director of Corporate Services in writing. However, there may 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, where the disclosure may result in a breach of the School's duty of care to the student, or where students have provided information in confidence.

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. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

### **ENQUIRIES AND COMPLAINTS**

If you 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 Principles, please contact the Principal or the Director of Corporate Services in writing.

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.

Contact details for further information, request for access, correction or complaints:

Walford Anglican School for Girls  
PO Box 430  
Unley SA 5061  
Phone: 8272 6555

**APPENDICES**

Appendix 1: Standard Collection Notice

Appendix 2: Walford Old Scholars' Association Collection Notice

Appendix 3: Employment Collection Notice

Appendix 4: Contractor/ Board Member/ Volunteer Collection Notice

Last Reviewed:	January 2025
Next Review:	January 2028
Responsibility:	Principal and Director of Finance and Corporate Services
Policy Number:	5.1

## APPENDIX 1

### Standard Collection Notice

1. The School collects personal information, including sensitive information about students and parents or caregivers before and during the course of a student's enrolment at the School. This may be in writing, through technology or in the course of conversations. The primary purpose of collecting this information is to enable the School to provide schooling to students enrolled at the School, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the *Privacy Act 1988*. We may ask you to provide medical reports about students from time to time.
5. A student's enrolment may be delayed or prevented if the School cannot collect certain personal information. This is particularly so where the information is relevant to the health and safety of the student, other students and/or staff.
6. The School may disclose personal and sensitive information to others for educational, administrative and support purposes. This may include:
  - a. other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
  - b. government departments (including for policy and funding purposes);
  - c. medical practitioners;
  - d. people providing educational, support and health services to the School, including specialist visiting teachers, coaches, volunteers, and counsellors;
  - e. providers of learning and assessment tools;
  - f. 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);
  - g. agencies and organisations to whom we are required to disclose personal information for educational research purposes;
  - h. people and organisations providing administrative and financial services to the School;
  - i. anyone you authorise the School to disclose information to; and
  - j. anyone to whom the School is required or authorised to disclose the information to by law, including child protection laws.
7. Personal information collected from students is regularly disclosed to their parents or caregivers.
8. The School uses information management and storage systems provided by third party service providers. 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.

9. The School uses 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. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' services providers is contained in the School's Privacy Policy.
10. The School's Privacy Policy, which can be found on the Walford website [www.walford.sa.edu.au](http://www.walford.sa.edu.au) sets out how parents or students may seek access to and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the student, where students have provided information in confidence or where the School is otherwise required or authorised by law to refuse access. Any refusal will be notified in writing with reasons (unless, given the grounds for refusal, it would be unreasonable to provide reasons).
11. The School Privacy Policy also sets out how parents and students can make a complaint about a perceived breach of the Australian Privacy Principles and how the complaint will be handled.
12. The School engages in fundraising activities. Information received from you may be used to make an appeal to you. Information may be disclosed to organisations that assist in the School's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
12. On occasions information such as academic and sporting achievements, student activities and similar news is published in School correspondence, publications, on our website, on social media, on other digital platforms or otherwise shared with the School community. This may include photographs and videos of student activities such as sporting events, concerts and plays, school camps and school excursions. The School will obtain permission from each student's parent or caregiver at the beginning of each school year if we would like to include such photographs or videos or other identifying material in our promotional material or otherwise make this material available to the public such as on the internet.
13. After obtaining consent from parents or caregivers the School may include the contact details of parents and students in a class list and/ or School Directory.
14. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why.

## APPENDIX 2:

### Walford Old Scholars' Association Collection Notice

1. The Walford Old Scholars' Association (the Association) may collect personal information about you from time to time. The primary purpose for collecting this information is to enable us to inform you about our activities and the activities of Walford Anglican School for Girls (the School) and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue to provide membership services to you.
3. From time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the School to assist in its fundraising activities. Please advise us in writing if you do not agree to this either now or in the future.
4. The Association may publish details about you in our correspondence, magazine, on social media accounts, or on the School's website. Please advise us in writing if you do not agree to this either now or in the future.
5. The School's Privacy Policy, which can be found on the Walford website [www.walford.sa.edu.au](http://www.walford.sa.edu.au) contains details on how you may seek access to and correction of your personal information which the School has collected and holds, and how you may complain about a perceived breach of the Australian Privacy Principles and how the School will deal with such a complaint.
6. The School uses 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 email services. Some limited personal information may also be provided to these services providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

## APPENDIX 3:

### Employment Collection Notice

1. In applying for this position you will be providing Walford Anglican School for Girls (the School) with personal information.
2. We collect your personal information directly from you, for example, your name and address or information contained on your resume. We may also collect it from other sources such as your referees and the results of criminal background and working with children checks. We collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy, which can be found on the Walford website [www.walford.sa.edu.au](http://www.walford.sa.edu.au) contains details on how you may complain about a perceived breach of the Australian Privacy Principles or how you may seek access to and correction of your personal information the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others or where the School is otherwise required or authorised by law to refuse access. Any refusal will be notified in writing with reasons (unless, having regards to the grounds for refusal, it would be unreasonable to provide reasons).
4. We will not disclose this information to a third party without your consent unless otherwise permitted.
5. We are required to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under child protection laws. We may also collect personal information about you in accordance with these laws.
6. 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 email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.
8. Contact details for the School are as follows:

Walford Anglican School for Girls  
PO Box 430  
Unley SA 5061  
Phone: 8272 6555

#### **APPENDIX 4:**

##### **Contractor/Volunteer/Board Member Collection Notice**

1. In offering, applying or agreeing to provide services to the School, you will be providing Walford Anglican School for Girls with personal information.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for up to ten years.
4. The School's Privacy Policy, which can be found on the Walford website [www.walford.sa.edu.au](http://www.walford.sa.edu.au) contains details on how you may seek access to personal information collected about you, how you may complain about a perceived breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others or where the School is otherwise required or authorised by law to refuse access. Any refusal will be notified in writing with reasons if appropriate
5. We will not disclose this information to a third party without your consent unless otherwise permitted to.
6. We are required to collect information regarding whether you have or have been the subject of an Apprehended Violence Order and certain criminal offences under child protection laws. We may also collect personal information about you in accordance with these laws.
7. 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 email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.
9. Contact details for the School are as follows:

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