



PRIVACY POLICY

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Version 1.0

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Policy Dates			
Formulated	08/05/2017	Adopted	17/05/2017
Implemented		Reviewed	
Next Review Due	30/01/2019 or as needed due to changes in legislation		
Policy Authorisation			
Principal	Helen Platell	Signature	

1. POLICY STATEMENT

Your privacy is important. This Policy sets out how the School uses and manages personal information provided to or collected by it.

- 1.1. The Mount Barker Waldorf School (The School) is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988 as amended. In relation to health records, the School is also bound by the [insert relevant State/Territory legislation as follows [Health Privacy Principles which are contained in Commonwealth Privacy Act 1988.

2. OBJECTIVES

- 2.1 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.
- 2.2 **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 the 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.
- 2.2.1 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.
- 2.2.2 The purposes for which the School uses personal information of students and parents include:
- pre-enrolment matters
 - to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and other publications;
 - day-to-day administration of the School;
 - looking after students' educational, social and medical wellbeing;
 - seeking donations or financial support for the school;
 - promotion and marketing of the School; and
 - complying with the School's legal obligations and allow the School to discharge its duty of care.
- 2.3 **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.

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

- administering the individual's engagement, employment or contract, as the case may be;
- for insurance purposes;
- seeking donations or financial support for the School;
- promotion and marketing of the School; and
- complying with the School's legal obligations, for example, in relation to child protection legislation.

2.4 **Volunteers:** The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as parent groups, to enable the School and the volunteers to work together.

2.5 **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 School's Spring Fair.

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

3. DEFINITIONS

3.1 In this document unless otherwise stated:

APP	Australian Privacy Principles
FARC	Finance and Risk Committee
The School	Mount Barker Waldorf School

4. RIGHTS AND RESPONSIBILITIES

4.1 Management and Security of personal information:

4.1.1 The School's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

4.2 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.

4.3 The School respects every Parent's right to make decisions concerning their child's education.

- 4.4 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.
- 4.5 Parents may seek access to personal information held by the School about them or their child by contacting the Principal or Business Manager by telephone or 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, or where the release may result in a breach of the School's duty of care to the student.
- 4.6 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.
- 4.7 **How does the School treat sensitive information?**
- 4.7.1 In referring to 'sensitive information', the School means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.
- 4.7.2 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 by law.

5. FUNCTIONS & RIGHTS

Who might the School disclose personal information to and store your information with?

- 5.1. The School may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:
- other schools;
 - government departments;
 - medical practitioners;
 - people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools;
 - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority;
 - people providing administrative and financial services to the School;
 - recipients of School publications, such as newsletters and magazines;
 - students' parents or guardians;

- 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.

5.2. **Sending and storing 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 send personal information about an individual outside Australia 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.

5.3. 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 servers which may be situated outside Australia.

An example of such a cloud service provider is Google. The School provider is Microsoft 365 which 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 Microsoft 365 and ensuring its proper use.

- 5.4. Enquires 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 Business Manager by phone or email at "Office User" ouser@mtbarkerwaldorf.sa.edu.au.
- 5.5. 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.

6. MONITOR

6.1 The effectiveness of this policy will be monitored by:

The Business Manager in consultation with FARC and overseen by the Principal.

7. INFORMATION/INSTRUCTION

What kinds of personal information does the School collect and how does the School collect it?

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

- 7.1.1. Students and parents and/or guardians ('parents') before, during and after the course of a student's enrolment at the School, including but not limited to:
- name, contact details (including next of kin), date of birth, previous school and religion;
 - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
 - conduct and complaint records, or other behaviour notes, and school reports; o information about referrals to government welfare agencies;
 - counselling reports; o health fund details and Medicare number;
 - any court orders;
 - volunteering information; and
 - photos and videos at School events;
- 7.1.2. Job applicants, staff members, volunteers and contractors including but not limited to:
- 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;
 - work emails and private emails (when using work email address) and Internet browsing history; and
- 7.1.3. 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.

7.2. ***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 and interviews, emails and telephone calls. On occasions people other than Parents and students provide personal information.

7.3. ***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.

7.4. ***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.

8. REVIEW

8.1 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.

9. RELATED DOCUMENTS

9.1 Internal Documents:

- a) Privacy Collection Notice
- b) Child Safe Environment Policy

9.2 External Documents:

- a) Commonwealth Privacy Act 1988 as amended

DOCUMENT AMENDMENT LIST

Section Title	Section Number	Amendment Summary	Version Number	Approved By	Date Approved