

## PURPOSE

Your privacy is important. This statement outlines Mount Barker Waldorf School's policy on how it uses and manages personal information provided to or collected by it.

The School is bound by the Australian Privacy Principles (AAPs) contained in the Commonwealth *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (as amended)*.

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.

## POLICY DETAIL

### 1. What kind of personal information does the School collect and how does the School collect it?

- 1.1. The type of information the School collects and holds includes (but is not limited to) personal information, including sensitive information, about:
  - a. Students and parents and/or guardians ("parents") before, during and after the course of a student's enrolment at the School;
  - b. Job applicants, staff members, volunteers and contractors; and
  - c. Other people who come into contact with the School.
- 1.2. **Personal Information you provide:** The School will generally collect personal information held about an individual by means 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.
- 1.3. **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.
- 1.4. **Exception in relation to employee records:** Under the *Privacy Act*, the Australian 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.

### 2. How will the School use the personal information you provide?

- 2.1. The School will use personal information it collects from you for the primary purpose of that collection. The School will also use personal information collected from you for such other secondary purposes that are reasonably related to the primary purpose of collection, 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 and educational services for the student. This includes satisfying the needs of parents and the needs of the student and the School throughout the whole period the student is enrolled at the School.
- 2.3. The purposes for which the School uses personal information of pupils and parents include:
  - a. pre-enrolment matters

- b. to keep parents informed about matters related to their child's schooling, through correspondence, newsletters, magazines and other publications;
  - c. day-to-day administration;
  - d. looking after students' educational, social and medical wellbeing;
  - e. drawing upon the expertise of particular members of the School community to assist with operations and functions
  - f. seeking donations or financial support for the School;
  - g. promotion and marketing of the School;
  - h. to satisfy the School's legal obligations and allow the School to discharge its duty of care.
- 2.4. 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.
- 2.5. **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.
- 2.6. The purposes for which the School uses personal information of job applicants, staff members and contractors include:
- a. in administering the individual's engagement, employment or contract, as the case may be;
  - b. for insurance purposes;
  - c. seeking donations or financial support for the School;
  - d. promotion and marketing of the School;
  - e. to comply with the School's legal obligations, for example, in relation to child protection legislation.
- 2.7. **Volunteers:** The School also obtains personal information about volunteers or members of parent groups who assist the School in its functions or conduct associated activities - such as Festivals or Spring Fair - to enable the School and the volunteers/parent groups to work together.
- 2.8. **Marketing and fundraising:** The School treats marketing and seeking donations or financial support 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 organization that assists in the School's fundraising, for example, the Spring Fair Committee.
- 2.9. Parents, staff, contractors and other members of the wider School community may, from time to time, receive fundraising information. School publications (such as newsletters, magazines and the Mount Barker Waldorf School website) and/or the public media (such as radio or television) which include personal information, may be used for marketing purposes with given permissions.

### 3. Who might the School disclose personal information to?

- 3.1. The School may disclose personal information, including sensitive information, held about an individual to:
- a. another school;
  - b. government departments;
  - c. medical practitioners;

- d. people providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- e. recipients of school publications, like newsletters and magazines;
- f. Parents; and
- g. anyone you authorize the School to disclose information to, and
- h. anyone to whom we are required to disclose the information to by law.

**3.2. Sending information overseas:** The School may disclose personal information about an individual to overseas recipients, for instance, when storing personal information which are located outside Australia or to facilitate a school exchange, visit or trip outside Australia without:

**3.3.** 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 and current privacy legislation.

#### **4. How does the School treat sensitive information?**

4.1. 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; and health information and biometric information about an individual.

4.2. 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. Management and security of personal information**

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

5.2. The School has in place steps to protect the personal information the School holds from misuse, interference and loss, unauthorized access, modification or disclosure by use of various methods, including locked storage of paper records and password protected access rights to computerised records.

#### **6. Access and correction of personal information**

6.1. Under the Commonwealth Privacy Act (as amended), 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.

6.2. There are some exceptions to these rights set out in the applicable legislation.

6.3. To make a request to access or update any personal information the School holds about you or your child, please contact the Business Manager 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, updating and copying any material requested. If the information sought is extensive, the School will advise the likely cost in advance. If we cannot provide you with access to that information, we shall provide you with written notice explaining the reason(s) for refusal.

#### **7. Consent and rights of access to the personal information of students**

7.1. The School respects every parent's right to make decisions concerning their child's education.

- 7.2. Generally, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's parent(s). 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.
- 7.3. As mentioned in (6) above, parents may seek access to personal information held by the School about them or their child by contacting the School. There will, however, 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.
- 7.4. The School may, at its discretion, upon 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 so warranted.

## 8. Enquiries and Complaints

- 8.1. If you would like further information about the way the School manages the personal information it holds, or wish to make any inquiry related to the School's compliance with the Australian Privacy Principles, please contact the Business Manager who acts as the School's Privacy Officer.
- 8.2. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as practicable after it has been lodged.

## VERSION CONTROL

Version	Action	Approved by	Date
Policy COM001.v1	Endorsed	Board	2017
Policy COM001.v1.2	Minor changes Review Due		2023