

POLICY NAME	Privacy Policy			POLICY NO.	12
EFFECTIVE DATE	November 2016	DATE OF LAST REVISION	May 2021	VERSION NO.	02
ADMINISTRATOR RESPONSIBLE	COO	CONTACT INFORMATION	Businessmanager@cggs.act.edu.au		
APPLIES TO					
FACULTY	Yes	STAFF	Yes	STUDENTS	Yes
STUDENT EMPLOYEES	Yes	VISITORS	Yes	CONTRACTORS	Yes

Scope

Describe what is the policy addressing and to whom this policy applies

<p>This Privacy Policy details how we, at Canberra Girls Grammar School (the School), protect your privacy and how we comply with the requirements of the Privacy Act 1988 and the 13 National Privacy Principles, as well as the requirements of Health Records (Privacy and Access) Act 1997 (ACT) ("the Health Privacy Principles). 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.</p>
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Policy purpose

Describe reason for policy

<p>This policy also describes:</p> <ul style="list-style-type: none"> - who we collect information from; - the types of personal information collected and held by us; - how this information is collected and held; - the purposes for which your personal information is collected, held, used and disclosed; - how you can gain access to your personal information and seek its correction; - how you may inquire about our collection, handling, use or disclosure of your personal information and how that inquiry will be handled; - whether we are likely to disclose your personal information to any overseas recipients.

Terms and definitions

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION
COO	Chief Operating Officer
CGGS	Canberra Girls Grammar School
Data breach	occurs when personal information that an entity holds is subject to unauthorised access or disclosure, or is lost
Privacy Commissioner	Australian Information Commissioner and Privacy Commissioner; government official, as defined by the relevant legislation

Policy sections

Who do we collect personal information from?

The School collects personal information from students, parents, prospective parents, job applicants, staff, volunteers and others including alumni, contractors, visitors and others that come into contact with the School. It is noted that employee records are not covered by the Australian Privacy Principles or the Health Privacy Principles where they directly relate to the current or former employment relationship between the School and the employee.

What kinds of personal information do we collect?

The kinds of personal information we collect is largely dependent upon whose information we are collecting and why we are collecting it, however in general terms the School may collect:

Personal Information including names, addresses and other contact details; dates of birth; next of kin details; financial information, photographic and video images, and attendance records.

Sensitive Information (particularly in relation to student and parent records) including religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, professional or union memberships, family court orders and criminal records.

Health Information (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.

How do we collect your personal information?

How we collect personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

Where possible the School has attempted to standardise the collection of personal information by using specifically designed forms (e.g. Application for Registration or a Medical Information Form). However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face to face meetings, and through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring.

We may also collect personal information from other people (e.g. a personal reference) or independent sources (e.g. a telephone directory), however, we will only do so where it is not reasonable and practical to collect the information from you directly.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as "unsolicited information". Where we collect unsolicited information we will only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate.

How we use personal information

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include but are not limited to:

- providing education, pastoral care, co-curricular, extra-curricular and health services;
- satisfying our legal obligations including our duty of care and child protection obligations;
- keeping parents informed as to the School community matters through correspondence, newsletters, magazines, our website, CANVAS and our school portal;
- marketing, promotional and fundraising activities;
- supporting the activities of school associations such as the Grammarians' Association, Parents & Friends Association and Gabriel Foundation;
- supporting community based causes and activities, charities and other causes in connection with the School's functions or activities;
- helping us to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis;
- school administration including for insurance purposes;
- the employment of staff;
- the engagement of volunteers.

We only collect sensitive information reasonably necessary for one or more of these functions or activities, if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or

safety, or another permitted general situation (such as locating a missing person) or permitted health situation (such as the collection of health information to provide a health service) exists.

If we do not have the relevant consent and a permitted health situation or permitted general situation does not exist, then we may still collect sensitive information provided it relates solely to individuals who have regular contact with the School in connection with our activities. These individuals may include students, parents, volunteers, former students and other individuals with whom the School has regular contact in relation to our activities.

We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

Storage and security of personal information

We store personal information in a variety of formats including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on the school databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile;
- Ensuring all staff are aware that they are not to reveal or share personal passwords;
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in a secure manner in lockable rooms. Access to these records is restricted to staff on a need to know basis;
- Implementing physical security measures around the school buildings and grounds to prevent break-ins;
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks;
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information;
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. Unless otherwise stated, we do not share your personal information with those websites and we are not responsible for their privacy practices.

Personal information of Students

The Privacy Act 1988 does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information. As a general principle, a young person is able to give consent when he or she has sufficient understanding and maturity to understand what is being proposed. In some circumstances, it may be appropriate for a parent or guardian to consent on behalf of a young person; for example, if the child is very young or lacks the maturity of understanding to do so themselves.

Canberra Girls Grammar School takes a common sense approach to dealing with a student's personal information and generally we will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students and we will treat consents provided by parents/carers as consents provided by a student.

We are however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older students and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents directly from students. We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

We aim to be open and transparent in our communication with parents relating to their child/children, however, there may also be occasions where parents/carers are not provided access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, breach the School's legal obligations or result in a breach of the School's duty of care to the student.

Disclosure of personal information to overseas recipients

We may disclose personal information about an individual to overseas recipients in certain circumstances, such as when we are organising an overseas excursion, facilitating a student exchange, or storing information with a "cloud computing service" which stores data outside of Australia.

All reasonable steps will be taken not to disclose an individual's personal information to overseas recipients unless:

- We have the individual's consent (which may be implied);or
- We have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- We form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- Disclosure is reasonably necessary for a law enforcement related activity.

How we ensure the quality of your personal information

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed. Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date..

Updating personal information

The National Privacy Principles require the School not to store personal information longer than necessary. You have the right to check what personal information the School holds about you. Under the Privacy Act 1988, 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. There are some exceptions to this right set out in this Act.

Students will generally have access to their personal information through their parents, but older students may seek access themselves. To make a request to access any information the School holds about you or your child, please contact the Privacy Officer in writing. The School may require you to verify your identity and specify what information you require.

How to gain access to your personal information we hold?

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us. If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

Data breach

CGGS has a robust system preventing data breach.

However, in the event of data breach the School will follow the relevant legislation and notify the affected individual as well and Privacy Commissioner.

Privacy complaints

You can contact us about this Policy or about your personal information by:

Emailing feedback@cggs.act.edu.au

Calling (02) 6202 6400

Writing to our Privacy Officer at Canberra Girls Grammar School, Melbourne Avenue, Deakin, ACT 2600 or by facsimile at (02) 6273 2554

If practical, you can contact us anonymously or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

Exceptions

Describe exceptions here

Related policies and other references

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1	Principal	November 2016	Review	COO
2	Principal	May 2021	Review	Director (Finance & Risk)
3	Principal	May 2022		

Legal references

Privacy Act 1988 13 National Privacy Principles Health Records (Privacy and Access) Act 1997 (ACT) ("the Health Privacy Principles)

Additional notes