



Oxford Falls Grammar Privacy Policy and Collection Notice

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Related Policies: Generative AI Policy

Your Privacy is Important

This statement outlines the School's policy on how the School collects uses and manages personal information (including photographs).

The School is bound by the Australian Privacy Principles contained in the Privacy Act 1988). In relation to health records, the School is also bound by the Health Privacy Principles which are contained in the *Health Records and Information Privacy Act 2002*. The School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Schools' operations and practices and to make sure it remains appropriate to the changing school environment. Privacy obligations will apply to any personal information input into an AI system, as well as the output data generated by AI (where it contains personal information).

What kind 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 sensitive information, about:

- Students, parents and/or guardians 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)
 - conduct and complaint records, correspondence, emails, 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 including on site CCTV footage
- 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, including onsite CCTV footage
 - work emails and private emails (when using work email address) and Internet browsing history



Personal Information you provide

The School will generally collect personal information held about an individual through, for example, forms filled out by parents or students, face-to-face meetings and interviews, and telephone calls.

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 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.

How will the School use the personal information you provide

The School will use personal information it collects from you

- for the primary purpose for which it was collected,
- for such other secondary purposes that are related to the primary purpose of collection
- that is reasonably expected,
- 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, exercise duty of care, and perform necessary associated administrative activities which will enable the pupils to take part in all the activities of the school. This includes satisfying both the needs of parents and the needs of the student 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
- Day-to-day administration
- Looking after students' educational, social and medical well being
- Seeking donations and marketing for the School
- For use in School newsletters, yearbooks, website, social media and other publications
- To satisfy the School's legal obligations and allow the School to discharge its Duty of Care
- To allow the P and C to conduct its reasonable commitments and activities

In some cases where the School requests personal information about a student or parent, if the information requested is not obtained, the School may not be able to enrol or continue the enrolment of the student, or allow them to participate in a specific activity.

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.

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

- In administering the individual's employment or contract, as the case may be;
- For insurance purposes;



- Seeking funds 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 conduct associated activities, such as Alumni associations, 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, for example, the School's Foundation or Alumni organisation.

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, which include personal information, may be used for marketing purposes. The school must include an *opt out* or *unsubscribe* option for all direct marketing communications pertaining to fund-raising with parents.

Who might the School disclose personal information to?

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

- Another school
- Government departments, including NSW Health
- Medical practitioners
- People providing educational, support and health services to the School, including specialist visiting teachers and sports 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
- lawyers representing the school
- relevant staff within the school
- providers of learning and assessment tools
- assessment and educational authorities, NESAs, 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)
- 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
- NSW or Federal police
- Recipients of School publications, like newsletters
- Parents (parent contact information may be distributed to other parents within the school)

Sending information overseas

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.



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. Google provides g suite including Gmail, 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 g suite and ensuring its proper use.

How does the School treat sensitive information?

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, sexual identity or criminal record, that is also personal information; and health information about an individual.

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. (E.g. immunisation records, criminal record checks)

Management and security of personal information

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

Updating Personal Information

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date through an annual process of the General Consent form. A person may seek to update their personal information held by the School by contacting the School Office at any time.

The Australian Privacy Principles require the School not to store personal information longer than necessary.

Access of Personal Information

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 including the School not having to disclose scholarship test results, internal marks or teacher notes (in the case of students) and internal notes (in the case of staff). 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 a parent or child, please contact the School Administrator in writing.

The School may require identification from the person seeking information and clarify what specific information is required. The School may charge a fee to cover the cost of verifying the 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.

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 School Administrator. 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
- where the release may result in a breach of the School's duty of care to the student
- where a student has provided information in confidence. (This is conditional on the health, safety and welfare of the student)

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 so warranted. (15 is considered old enough to have the capacity to consent)

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 in writing. If the complaint is unable to be resolved at a school level, the Information Commissioner may investigate the complaint.

Collection Notice

1. The School collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a student's enrolment at the School. This may be in writing 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, Public Health and Child Protection laws.

4. Health information about students is sensitive information within the terms of the Australian Privacy Principles (APPs) under the *Privacy Act 1988*. We may ask you to provide medical reports about students from time to time.

5. The School may disclose personal and sensitive information for educational, administrative and support purposes, including to facilitate the transfer of a student from school to school. This may include other schools and teachers at those schools, government departments (including for policy and funding purposes), medical practitioners, lawyers representing the school, people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors, providers of learning and assessment tools, assessment and educational authorities, including the Australian Curriculum, NES, Assessment and Reporting Authority (ACARA) and NAPLAN



Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN), people providing administrative and financial services to the School, anyone you authorise the School to disclose information to, and anyone to whom the School is required or authorised to disclose the information to by law, including child protection laws and NSW or Federal Police.

6. Personal information collected from students is regularly disclosed to their parents or guardians.

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 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 on online or 'cloud' service providers is contained in the School's Privacy Policy.

8. The School's Privacy Policy, accessible on the School's website, 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 pupil, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.

9. The School's Privacy Policy also sets out how parents and pupils can make a complaint about a breach of the APPs and how the complaint will be handled.

10. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. It may also 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. If you do not wish to receive any marketing communications from the School please contact the School Office.

11. On occasions information such as academic and sporting achievements, pupil activities and similar news is published in School yearbooks, on our intranet, social media, our website, in journals, newspaper or magazine advertising or editorial; for example, but not limited to, student success in a competition, or data pertaining to Higher School Certificate performance. This may include photographs and videos of pupil activities such as sporting events, school camps and school excursions. The School will obtain permissions [annually] from the student's parent or guardian (and from the student if appropriate) 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.

12. We may include students' and students' parents' contact details in a class list and directory to allow the P and C to conduct its activities such as social events. If you do not wish your contact details to appear on documents of this nature, please contact the School Office.

13. 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.