



GOV005 - PRIVACY POLICY

PURPOSE

Your privacy is important. This statement outlines Willunga 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 (APPs) 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.

RELATED POLICIES AND DOCUMENTS

<ul style="list-style-type: none"> • Child Protection Policy • Child Safe Environments Policy • Enrolment Packs • Photo Consent 	<ul style="list-style-type: none"> • Work Health Safety Policy • Employment Policy and Procedures • Induction packs (staffing and volunteers)
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POLICY LOCATIONS

<ul style="list-style-type: none"> • Staff Policy Manuals – Early Childhood • Staff Induction Policy Manuals (EC and School) • School Stream Parent App 	<ul style="list-style-type: none"> • School Stream Teacher App • Staff Portal • Website
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Version	1.2
Publication Date	2014
Responsibility	Head of School
Review Date	2020
Next Review Date	2023
Related Legislation and Regulatory Requirements	<i>Privacy Amendment (Enhancing Privacy Protection) Act</i> Australian Privacy Principles (APPs)
Cross sector Guidelines (SA)	



GOV005 - PRIVACY POLICY

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 ways 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:
- pre-enrolment matters
 - to keep parents informed about matters related to their child's schooling, through correspondence, newsletters, magazines and other publications;
 - day-to-day administration;
 - looking after students' educational, social and medical wellbeing;
 - drawing upon the expertise of particular members of the School community to assist with operations and functions
 - seeking donations or financial support for the School;
 - promotion and marketing of the School;
 - 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, or 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:
- in 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;
 - 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 the Willunga Waldorf School Inc. Parents and Friends Association - to enable the School and the volunteer's/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 Willunga Waldorf School Inc Parents' & Friends Association.
- 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 Willunga Waldorf website) and/or the public media (such as radio or television) which include personal information, may be used for marketing purposes.

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 with 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 computerized 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 pupils

- 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.



Appendix

- Appendix 1 - Standard Collection Notice for Parents
- Appendix 2 - Employment Collection Notice
- Appendix 3 - Contractor/Volunteer Collection Notice
- Appendix 4 - Alumni Collection Notice



Appendix 1: Student/Family Data - Standard Collection Notice

NOTICE ABOUT COLLECTION OF INFORMATION BY THE SCHOOL

1. The School collects personal information, including sensitive information about pupils and parents and guardians before and during the course of a pupil'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 the pupil and to enable them 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 schools require that certain information is collected. These include relevant 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*. We may ask you to provide medical information and reports about your child from time to time.
5. The School, as required, either by law or as appropriate for proper discharge of our duties, will disclose personal and sensitive information to others for administrative and educational purposes. This includes disclosure to other schools, government departments, medical practitioners and people providing services to the School, including specialist visiting teachers, sports coaches and volunteers and counsellors.
6. Personal information collected from pupils is regularly disclosed to their parents or guardians. On occasions, information regarding academic and sporting achievements, student activities and similar news is published in School newsletters, magazines and on our website. Photographs of student activities such as sporting events, school camps and school excursions may be taken for publication in School newsletters and magazines and on our website. The School will obtain separate permissions from the student's parent or guardian prior to publication of photographs.
7. The School may store personal information in 'the cloud' which may mean that it resides on servers which are situated outside off Australia. The school stores all personal information in secure filing cabinets.
8. Parents or pupils may seek access to personal information collected about them by contacting the School. There will, however, be occasions when access is denied. Such occasions would include 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, or where students have provided information in confidence.
9. The School Privacy Policy also sets out how you may register a complaint about a breach of privacy and how the School will deal with such a complaint.
10. The School also, from time to time, engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organizations that assist in the School's fundraising activities solely for that purpose. We shall not disclose your personal information to third parties for their own marketing purposes without your consent.
11. Your contact details may also be included in a Parent Directory, published each year. You will have the opportunity to advise us before the start of each year, whether you wish and consent to having your details included in this Directory.
12. 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, that they can access that information if they wish and that the School does not usually disclose the information to third parties.



Appendix 2: Employee - Standard Collection Notice

NOTICE ABOUT COLLECTION OF INFORMATION BY THE SCHOOL

1. In applying for this position, you will be providing the School with personal Information.
2. If you provide us with personal information, for example, your name and address or information contained in your resume, we will collect the information 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 WILLUNGA WALDORF SCHOOL Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles or how you may seek access to, or 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. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent.
5. We are required to conduct, or obtain a copy of, a Working with Children Check to collect information regarding whether you are or have been the subject of an AVO (Apprehended Violence Order) or an Intervention 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 server 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.
7. If you provide us with the personal information of others, i.e. referees, we encourage you to inform them that you are disclosing that information to the School and why.



Appendix 3: Contractor/Volunteer - Standard Collection Notice

NOTICE ABOUT COLLECTION OF INFORMATION BY THE SCHOOL

1. In applying for this position, you will be providing the School 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 12 months.
4. The WILLUNGA WALDORF SCHOOL Privacy Policy, accessible on the School's website, contains details of how you may complain about a 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. 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 conduct, or obtain a copy of, a Working with Children Check to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect other 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 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 server 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. 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 4: Alumni - Standard Collection Notice

NOTICE ABOUT COLLECTION OF INFORMATION BY THE SCHOOL

1. Willunga Waldorf School may collect personal information about you from time to time as members of the WILLUNGA WALDORF SCHOOL or School Alumni. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of WILLUNGA WALDORF SCHOOL and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the WILLUNGA WALDORF SCHOOL Alumni.
3. As you know, 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 WILLUNGA WALDORF SCHOOL to assist in its fundraising activities. If you do not agree to this, please advise us in writing.
4. WILLUNGA WALDORF SCHOOL Alumni may publish details about you in various WILLUNGA WALDORF SCHOOL and School publications over time. If you do not agree to this, you must advise us in writing.
5. The WILLUNGA WALDORF SCHOOL Privacy Policy, accessible on the School's website, contains details of 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 breach of the Australian Privacy Principles.
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 server 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.
- 7.
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.



AMENDMENTS

Date	Amendment
28/05/2020	Addition of Appendix 2 3 and 4