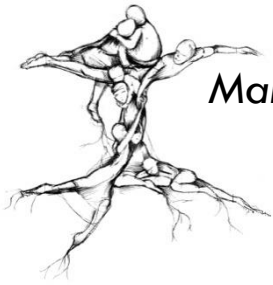


# Privacy Policy

<b>Purpose:</b>	Maleny Independent School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the school and describes how the school uses and manages personal information provided to or collected by it.	
<b>Scope:</b>	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the school site; and describes the type of information the school collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.	
<b>References:</b>	<ul style="list-style-type: none"><li>• <i>Privacy Act 1988 (Cth)</i></li><li>• <i>Privacy Amendment (Enhancing Privacy Protection) Act 2012</i></li><li>• Maleny Independent School Child Protection Policy</li><li>• Maleny Independent School Disability Discrimination Policy</li></ul>	
<b>Status:</b>	Rev003	<b>Supersedes:</b> Rev002
<b>Authorised by:</b>	Board Delegate: Rowan Hutson	<b>Date of Authorisation:</b> 27 May 2019
<b>Review Date:</b>	Annually/ 18 March 2020	<b>Next Review Date:</b> 18 March 2021
<b>Policy Owner:</b>	School Governing Body	



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## Exception in Relation to Employee Records

Under the *Privacy Act*, the Australian Privacy Principles do not apply to an employee record held by the employing entity. 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.

## Policy

This Privacy Policy sets out how the School manages personal information provided to or collected by it. The School is bound by the Australian Privacy Principles contained in the *Commonwealth Privacy Act*. 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.

## What kinds 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 health and other sensitive information, about:

- pupils and parents and/or guardians ('Parents') before, during and after the course of a pupil's enrolment at the School
- job applicants, staff members, volunteers and contractors
- other people who come into contact with the School.

### Personal Information you provide:

The School will generally collect personal information held about an individual by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and pupils provide personal information.

### 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, information related to a dispute or a reference from another school.

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

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.

### Pupils and Parents

In relation to personal information of pupils and Parents, the School's primary purpose of collection is to enable the School to provide schooling for the pupil. This includes satisfying the needs of Parents, the needs of the pupil and the needs of the School throughout the whole period the pupil is enrolled at the School.



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The purposes for which the School uses personal information of pupils and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- day-to-day administration of the School
- looking after pupils' educational, social and medical wellbeing
- seeking donations and marketing for the School
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

In some cases where the School requests personal information about a pupil or Parent, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular 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 donations 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 provide a quality learning environment in which both pupils 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 Foundation or alumni organisation [or, on occasions, external fundraising organisations].

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



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## Who might the School disclose Personal Information to?

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

- another school or staff at another school
- 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
- pupils' parents or guardians
- anyone you authorise the School to disclose information to
- anyone to whom we are required to disclose the information to by law.

## Sending 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:

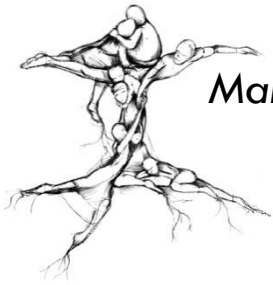
- obtaining the consent of the individual (in some cases this consent will be implied)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

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 the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. School personnel and the AIS 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 GAFE and ensuring its proper use.

## 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, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.



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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.

## Management and Security of Personal Information

The School's staff are required to respect the confidentiality of pupils' 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, 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.

## Access and Correction of Personal Information

Under the *Commonwealth Privacy Act*, 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. Pupils will generally be able to access and update their personal information through their Parents, but older pupils may seek access and correction themselves.

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

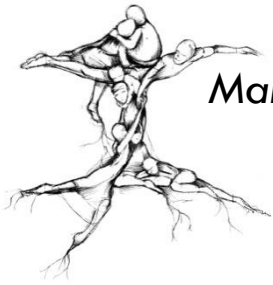
To make a request to access or update any personal information the School holds about you or your child, please contact the School Principal in writing. The School may require you to verify your identity and specify what information you require. The School may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing 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 will provide you with written notice explaining the reasons for refusal.

## Consent and Rights of Access to the Personal Information of Pupils

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 pupil to the pupil's Parents. The School will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

As mentioned above, parents may seek access to personal information held by the School about them or their child by contacting the [School Principal]. 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, or where the release may result in a breach of the School's duty of care to the pupil.

The School may, at its discretion, on the request of a pupil grant that pupil access to information held by the School about them, or allow a pupil 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 pupil and/or the pupil's personal circumstances warrant it.

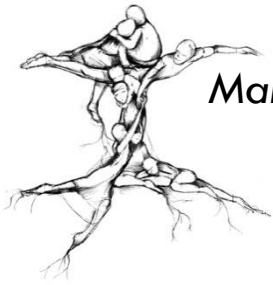


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### **Enquiries and Complaints**

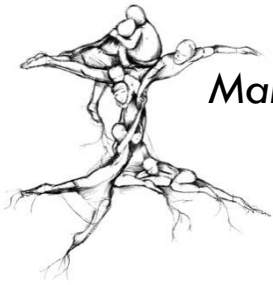
If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles please contact the School at [info@malenyindependentschool.com.au](mailto:info@malenyindependentschool.com.au). 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.



## APPENDIX 1

### Standard Collection Notice

1. The School collects personal information, including sensitive information about pupils and parents or 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 pupils enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will 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 a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health [and Child Protection]\* laws.
4. Health information about pupils is sensitive information within the terms of the Australian Privacy Principles under the *Privacy Act*. We may ask you to provide medical reports about pupils from time to time.
5. The School may disclose personal and/or sensitive information for educational, administrative and support purposes. This may include to:
  - other schools and teachers at those 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
  - anyone you authorise the School to disclose information to
  - anyone to whom the School is required or authorised to disclose the information to by law, including child protection laws.
6. Personal information collected from pupils 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.\*\*

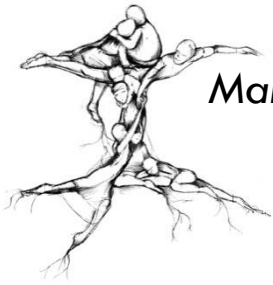


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8. The School's Privacy Policy, accessible on the School's website, sets out how parents or pupils may seek access to personal information collected about them. However, access may be refused in certain circumstances. Such occasions would include where 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 pupil, or where pupils have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
9. The School Privacy Policy also sets out how you may complain about a breach of privacy and how the School will deal with such a complaint.
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.
11. On occasions information such as academic and sporting achievements, pupil activities and similar news is published in School newsletters and magazines, on our intranet [and on our Facebook page and website]. This may include photographs and videos of pupil activities such as sporting events, school camps and school excursions. The School will obtain separate permissions from the pupils' parent or guardian (and from the student if appropriate) prior to publication or otherwise make this material available to the public such as on the internet.
12. We will seek your authorisation to include pupils' and pupils' parents' contact details in a class list and School directory.
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.





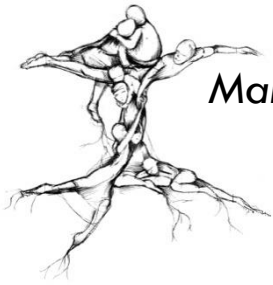
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## APPENDIX 2

### Alumni Association Collection Notice

1. We may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of the Maleny Independent 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 Alumni Association].
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 Maleny Independent School to assist in its fundraising activities.] [If you do not agree to this, please advise us now.]
4. We may publish details about you in publications and our/the School's website. If you do not agree to this you must advise us now.
5. The School's 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 APPs.
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 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.
7. If you provide personal information to us about other people, we encourage you to inform them that you are disclosing that information to the School and why.



# Maleny Independent School

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## APPENDIX 3

### Employment Collection Notice

1. In applying for this position you will be providing Maleny Independent School with personal information. We can be contacted at: [admin@mis.qld.edu.au](mailto:admin@mis.qld.edu.au)
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 for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the APPs and how you may seek access to and correction of your personal information which the School has collected and holds. However, there may be occasions when access is denied. Such occasions would include 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. We usually disclose this kind of information to support vendors that provide services around staff administration systems.
5. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence 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 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.
7. 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.



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## APPENDIX 4

### Contractor/Volunteer Collection Notice

1. In applying to provide services to the School, you will be providing Maleny Independent School with personal information. We can be contacted at [admin@mis.qld.edu.au](mailto:admin@mis.qld.edu.au)
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 5 years.
4. The School's Privacy Policy, accessible on the School's website, sets out how you may seek access to your personal information and how you may complain about a breach of the APPs. and how you may seek access to and correction of your personal information which the School has collected and holds. However, there may be occasions when access is denied. Such occasions would include 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. We usually disclose this kind of information to support vendors that provide services around staff administration systems.
6. We are required to conduct a criminal record check and 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 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 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 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. 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.