

Privacy Policy

This Privacy Policy sets out how Queenwood School (**Queenwood**) manages personal information provided to or collected by it. Queenwood is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth). In relation to health records, Queenwood is also bound by the *Health Records and Information Privacy Act 2002* (NSW) (**Health Records Act**). Queenwood may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Queenwood's operations and practices and to make sure it remains appropriate to the changing school environment.

Exception in relation to employee records: Certain exceptions arise under the Privacy Act and Health Records Act in connection with the use and disclosure of information contained in employee records. This Privacy Policy does not apply to Queenwood's use or disclosure of personal information contained in an employee record, where the use or disclosure is directly related to a current or former employment relationship between Queenwood and the individual.

WHAT KINDS OF PERSONAL INFORMATION DOES QUEENWOOD COLLECT?

The types of personal information Queenwood collects and holds includes (but is not limited to) information, about:

- Pupils and parents and/or guardians (**Parents**) before, during and after the course of a pupil's enrolment at Queenwood, including:
 - Name, contact details (including details of the pupil's next of kin), date of birth, previous school and religion;
 - Medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
 - Conduct and complaint records, or other behaviour notes, and school reports;
 - Results of assignments, tests and examinations;
 - Email communications (when using or sent to a Queenwood email address);
 - 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 Queenwood events.

- Job applicants, volunteers and contractors, including:

- Name, contact details (including next of kin), date of birth, and religion;
 - Information included in any job application or resume;
 - Criminal history and working with children checks;
 - Professional development history;
 - Salary and payment information, including superannuation details and tax file numbers;
 - Medical information (e.g. details of disability and/or allergies, and medical certificates);
 - Complaint records and investigation reports;
 - Photos and videos at Queenwood events;
 - Workplace surveillance information;
 - Email communications (when using a Queenwood email address) and Internet browsing history when using a Queenwood device.
- Other people who come into contact with Queenwood, including name and contact details and any other information necessary for the particular contact with Queenwood.

HOW DOES QUEENWOOD COLLECT PERSONAL INFORMATION?

Queenwood will generally collect personal information held about an individual directly from that individual or their Parent, including by way of forms filled out by Parents or pupils, through face-to-face meetings and interviews where notes or records may be produced, emails and telephone calls.

In some circumstances Queenwood may be provided with personal information about an individual from a third party, for example a report provided by a medical professional, criminal history check or a reference from another school.

HOW WILL QUEENWOOD USE THE PERSONAL INFORMATION YOU PROVIDE?

Queenwood 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, Queenwood's primary purpose of collection is to enable Queenwood to provide schooling to pupils enrolled at Queenwood, exercise its duty of care, and perform necessary associated administrative activities, which will enable pupils to take part in all the activities of Queenwood. This includes satisfying the needs of Parents, the

needs of the pupil and the needs of Queenwood throughout the whole period the pupil is enrolled at Queenwood.

The purposes for which Queenwood 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 Queenwood;
- looking after pupils' educational, social and medical wellbeing;
- seeking donations and undertaking public relations, marketing and market research activities for Queenwood; and
- to satisfy Queenwood's legal obligations and allow Queenwood to discharge its duty of care.

In some cases where Queenwood requests personal information about a pupil or Parent, if the information requested is not provided, Queenwood 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 and contractors: In relation to personal information of job applicants and contractors, Queenwood's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be.

The purposes for which Queenwood uses personal information of job applicants and contractors include:

- administering the individual's job application, or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for Queenwood; and
- satisfying Queenwood's legal obligations, for example, in relation to child protection legislation.

Volunteers: Queenwood also obtains personal information about volunteers who assist Queenwood in its functions or conduct associated activities, such as the Queenwood Old Girls' Association (**QOGA**), to enable Queenwood to contact volunteers and administer the volunteer position, for insurance purposes and to satisfy Queenwood's legal obligations.

Marketing and fundraising: Promoting the Queenwood experience and seeking donations for the future growth and development of Queenwood are an important part of ensuring that Queenwood continues to provide a quality learning environment in which both pupils and staff thrive.

Personal information collected and held by Queenwood may be disclosed to organisations that assist in Queenwood's fundraising, for example, Queenwood Parents Association (**QPA**) or, on occasions, external fundraising organisations.

Parents, staff, contractors and other members of the wider Queenwood community may from time to time receive fundraising information.

Personal information may also be disclosed by Queenwood to third party service providers who assist with market research, including to undertake demographic analysis of Queenwood's current and prospective student population or conduct surveys of former, current and prospective pupils and Parents.

From time to time, Queenwood will produce publications, like newsletters and magazines, which include personal information, and may be used for marketing and public relations purposes.

WHO MIGHT QUEENWOOD DISCLOSE PERSONAL INFORMATION TO AND STORE YOUR INFORMATION WITH?

Queenwood may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools;
- administering bodies of schools, including the Association of Independent Schools, New South Wales;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to Queenwood, 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 (ACARA);
- people providing administrative, marketing, financial and professional services to Queenwood, including its accountants and legal advisors;
- recipients of School publications, such as newsletters and magazines;
- a pupils' Parents;

- anyone you authorise Queenwood to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including any Court or Tribunal order, including child protection laws.

Sending and storing information overseas

Queenwood may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Queenwood 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 or other applicable privacy legislation.

Queenwood may use online or 'cloud' service providers to store personal information and to provide services to Queenwood 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. Some 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. Examples of cloud service providers that Queenwood may use include Microsoft and Google.

Access and correction of personal information

Under the Privacy Act and the Health Records Act, you have the right to seek and obtain access to any personal information which Queenwood holds about you and to advise Queenwood 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 correct the information themselves.

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

To make a request to access or to update any personal information Queenwood holds about you or your child, please contact the Principal by telephone or in writing. Queenwood may require you to verify your identity and specify what information you require.

Queenwood 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, Queenwood 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

Queenwood respects every Parent's right to make decisions concerning their child's education.

Generally, Queenwood will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. Queenwood 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.

Parents may seek access to personal information held by Queenwood about them or their child by contacting the Principal by telephone or in writing. However, there may 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 Queenwood's duty of care to the pupil.

Queenwood may, at its discretion, on the request of a pupil grant that pupil access to information held by Queenwood 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 relevant circumstances warrant it.

Enquiries and complaints

If you would like further information about the way Queenwood manages the personal information it holds, or wish to complain as you believe Queenwood has breached the Australian Privacy Principles, please contact the Principal by telephone or writing. Queenwood 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.

If you are not satisfied with Queenwood's response, you may wish to raise your concerns with the Commonwealth or New South Wales Privacy Commissioners. Further information, including relevant contact details are available at the following websites:

<https://www.oaic.gov.au/>

<https://www.ipc.nsw.gov.au/>

RELATED POLICIES

Notifiable Privacy Breach Risk Assessment

Privacy Breach Response Procedures

Last Updated November 2023

APPENDIX A - VERSION CONTROL

VERSION	STATUS/AMENDMENTS	DATE AMENDED	AUTHOR
1	Document Created	September 25, 2018	Wendy England
2	Update policy to reflect current use of data practices as well as implementation of cloud software	November 30, 2023	Colette Pretorius