Privacy Policy

1. SCOPE

This Privacy Policy sets out how Queenwood School (Queenwood) manages personal information provided to or collected by it and your right in relation to your personal information, including how to complain and how we deal with complaints.

Queenwood is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (Privacy Act). In relation to health records, Queenwood is also bound by the *Health Records and Information Privacy Act 2002* (NSW) (Health Records Act).

Under the Privacy Act and Health Records Act, the Australian Privacy Principles and Health Privacy Principles do not apply to the treatment of an employee record. As a result, this Privacy Policy does not apply to Queenwood's treatment of an employee record held by the School, where the treatment is directly related to a current or former employment relationship between Queenwood and the employee.

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. The current version of this Privacy Policy is published on our website.

2. APPLICABILITY

This policy applies to all prospective and current students and parents/carers, job applicants, contractors and volunteers.

3. RESPONSIBILITIES

The Principal and appointed delegates are responsible for the effective implementation of this policy.

4. WHAT KINDS OF PERSONAL INFORMATION DOES QUEENWOOD COLLECT?

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

4.1 Students and parents /or carers ('parents') before, during and after the course of a student's enrolment at Queenwood as well as alumnae, including:

a. Name, contact details (including next of kin), date of birth, previous school (if applicable) and religion;
b. Parents education, occupation, language spoken at home, nationality and country of birth;
c. Health information (e.g. details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports and names of doctors);
d. Results of assignments, tests and examinations;
e. Conduct and complaint records, or other behaviour notes, and school reports;
f. Information about referrals to government welfare agencies;
g. Counselling reports;
h. Health fund details and Medicare number;
i. Family court orders;
j. Volunteering information;
k. Photos and videos at Queenwood events; and
l. Relevant details for maintaining community engagement, facilitating events, communicating with alumnae and supporting fundraising and development activities.

4.2 Job applicants, volunteers and contractors, including:

a. Name, contact details (including next of kin), date of birth;
b. Information included in any job application or resume;
c. Criminal history and working with children checks;
d. Professional development history;
e. Salary and payment information, including superannuation details and tax file numbers;
f. Health information (e.g. details of disability and/or allergies, and medical certificates);
g. Complaint records and investigation reports;
h. Photos and videos at Queenwood events;
i. Workplace surveillance information;
j. Work email communications (when using a Queenwood email address) and Internet browsing history when using a Queenwood device.

4.3 Other people who come into contact with Queenwood, including name and contact details and any other information necessary for the particular contact with Queenwood.

5. HOW DOES QUEENWOOD COLLECT PERSONAL INFORMATION?

5.1 Personal information you provide

Queenwood will generally collect personal information held about an individual directly from that individual (or their Parent in the case of students), including by way of forms filled out by

Parents or students, through face-to-face meetings and interviews where notes or records may be produced, emails and telephone calls.

5.2 Personal information provided by other people

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. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

5.3 Personal information generated by Artificial Intelligence (AI) systems

Queenwood may also collect personal information by using AI systems to generate it. The kinds of personal information that may be generated by AI systems include those set out above in Section 4. **Personal information from other sources**
Queenwood may also collect personal information through surveillance and security activities, including CCTV, network and cybersecurity monitoring, email security and filtering systems, web filtering, system logging and authorised review undertaken for safeguarding, security, acceptable-use, legal, compliance and operational purposes.

6. PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

The purposes for which Queenwood collects, uses and discloses personal information depend on our relationship with you and include the following:

6.1 Students and Parents

a. providing schooling and school activities;
b. satisfying the needs of the students, Parents and the needs of Queenwood throughout the whole period a student is enrolled at Queenwood;
c. making required reports to government authorities;
d. keeping Parents informed about matters related to their child's schooling through correspondence, school-approved digital platforms and communication services, newsletters and publications;
e. day-to-day administration of Queenwood;
f. looking after students' educational, social and medical wellbeing;
g. seeking donations (see Section 6.4 for further information) and undertaking public relations, marketing and market research activities for Queenwood; and
h. 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 student or Parent, and if the information requested is not provided, Queenwood may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

6.2 Volunteers

a. to enable Queenwood to contact volunteers and administer the volunteer position,
b. for insurance purposes; and
c. to satisfy Queenwood's legal obligations for example, in relation to child protection legislation.

6.3 Job applicants and contractors

a. Assessing and (if successful) engaging the applicant or contractor;
b. administering the individual's employment, or contract;
c. for insurance purposes;
d. seeking donations and marketing for Queenwood (see Section 6.4); and
e. satisfying Queenwood's legal obligations, for example, in relation to child protection legislation.

6.4 Marketing and fundraising

a. 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 students and staff thrive;
b. 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;
c. Parents, staff, contractors and other members of the wider Queenwood community may from time to time receive fundraising information;
d. 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;
e. Maintaining contact with alumnae for community engagement, networking, communications, historical record keeping, fundraising and development activities. As Queenwood has alumnae living in Australia and overseas, personal information may be collected, used and disclosed for these purposes in accordance with this Privacy Policy; and
f. 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.

7. WHO QUEENWOOD DISCLOSES PERSONAL INFORMATION TO

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

a. other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
b. administering bodies of schools, including the Independent Schools, New South Wales;
c. government departments (including for policy and funding purposes);
d. medical practitioners;
e. people providing educational, support and health services to Queenwood, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools;
f. assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manage the online platform for NAPLAN);
g. agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;
h. people providing administrative, marketing, financial and professional services to Queenwood, including its accountants and legal advisors;
i. providers of approved information technology, cloud, analytics and artificial intelligence services where those services require personal information to provide authorised functions to Queenwood
j. recipients of School publications, such as newsletters and magazines;
k. a students' parents/carers;
l. Alumnae, event organisers, communications platforms and other service providers engaged to support alumnae relations, fundraising, networking and community engagement activities;
m. anyone you authorise Queenwood to disclose information to; and
n. anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

8. HOW QUEENWOOD STORES PERSONAL INFORMATION

Queenwood stores personal information in hard copy and electronically. We use informational management and storage systems provided by third party service providers. Personal information is stored with and accessible by the third-party service providers for the purpose of providing services to Queenwood in connection with the systems.

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. See Section 10 for “Sending and Storing Information Overseas”.

9. SENDING AND STORING INFORMATION OVERSEAS

Queenwood may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange.

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 and provide technical support. 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 and online service providers used by Queenwood include Microsoft and Google. Queenwood also uses other specialist providers for school administration, communication, learning, assessment, security and support services.

Queenwood's alumnae community includes former students who reside within and outside Australia. Including in jurisdictions such as the United Kingdom, the United States, countries within Europe, Asia and elsewhere.

In connection with alumnae engagement, events, communications, networking, fundraising and development activities, Queenwood may collect, use, store or disclose personal information relating to individuals located overseas.

Where personal information is disclosed to overseas recipients or held using cloud-based service providers with servers located outside Australia, Queenwood will take reasonable steps to ensure that such information is handled in a manner consistent with applicable privacy obligations. Individuals should be aware that privacy laws in other jurisdictions may differ from those that apply in Australia and may not provide the same level of protection as Australian privacy laws.

10. SECURITY OF PERSONAL INFORMATION

Queenwood takes reasonable technical, physical and organisational steps to protect the personal information it holds from misuse, interference, loss, unauthorised access, modification and disclosure. Controls are selected having regard to the nature and sensitivity of the information, the systems in which it is held and the risks associated with its use.

These steps include:

a. Restricting access to information on the student information system on a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities.
b. Ensuring all staff are aware that they are not to reveal or share personal passwords.

c. Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets. Access to these records is restricted to staff on a need-to-know basis.
d. Implementing physical security measures around Queenwood buildings and grounds to prevent break-ins.
e. Implementing ICT security systems designed to protect personal information storage on our computer networks.
f. Implementing policies and procedures such as email and internet usage and confidentiality policies, designed to ensure that staff follow correct procedures when handling personal information.
g. Undertaking privacy and security due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, that store, process or access personal information, to ensure as far as practicable, that they are compliant with the Australian Privacy Principles or a similar privacy regime.
h. Managing software updates, security patches, system configurations and vulnerabilities.
i. Maintaining back up, recovery, business-continuity and incident-response arrangements.

11. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to seek access to, and/or correct any personal information which Queenwood holds about them. Students will generally be able to access and update their personal information through their Parents, but older students 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 an individual or their child, please contact the Principal by telephone or in writing. Queenwood may require the individual to verify their identity and specify what information they 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 (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.

12. CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

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 student to the student's Parents. Generally, Queenwood 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 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 may include but are not limited to, where Queenwood believes the student has the capacity to consent and Queenwood is not permitted to disclose the information to the Parent without the student's consent, 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 student.

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

13. 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 to the Office of the Australian Information Commissioner (OAIC) via the OAIC websitehttps://www.oaic.gov.au/

14. RELATED POLICIES AND PROCEDURES

Information Sharing with Third Parties Policy

Notifiable Privacy Breach Risk Assessment

Privacy Breach Response Procedures

POLICY REVIEW

Date	Author	Next Review Date	Notes
September 2018	Director of Business and Finance; Risk and Compliance Manager	As required by relevant legislation.	Policy updates.
November 2023	COFO; Risk and Compliance Manager	As required by relevant legislation.	Policy updates to reflect current use of data practices and implementation of cloud software.
November 2026	Deputy Principal; Professor of Professional Practice & Strategic Projects; Head of ICT; Risk and Compliance Manager	As required by relevant legislation.	Content and formatting changes to policy.