

## Queenwood's 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 Commonwealth *Privacy Act 1988*. 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 the School's operations and practices and to make sure it remains appropriate to the changing school environment.

### What kinds of personal information does Queenwood collect and how does the Queenwood collect it?

The type of information Queenwood 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 Queenwood, including:
  - Name, contact details (including 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;
  - 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, 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 Queenwood events;
  - Workplace surveillance information;
  - Work emails and private emails (when using work email address) and Internet browsing history; and
- Other people who come into contact with the School, including name and contact details and any other information necessary for the particular contact with Queenwood.

*Personal Information you provide:* Queenwood 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 Queenwood 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:* The Privacy Act, the Health Records Act, the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to Queenwood's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Queenwood and the employee.

## **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 the School to provide schooling to pupils enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable pupils to take part in all the activities of the School. 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 the School.

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 marketing for Queenwood; and
- to satisfy Queenwood's legal obligations and allow the School 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, 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 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 employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the School; and
- satisfying Queenwood's legal obligations, for example, in relation to child protection legislation.

*Volunteers:* Queenwood also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as the Queenwood Old Girls' Association ("QOGA"), to enable the School and the volunteers to work together.

*Marketing and fundraising:* Queenwood treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that Queenwood continues to provide a quality learning environment in which both pupils and staff thrive. Personal information held by Queenwood may be disclosed to organisations that assist in the School'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. Queenwood publications, like newsletters and magazines, which include personal information, may be used for marketing 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;

- 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; and
- anyone to whom we are required or authorised to disclose the information to by law, 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 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. 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.

## **How does Queenwood treat sensitive information?**

In referring to 'sensitive information', Queenwood 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.

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**

Queenwood's staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

Queenwood 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 and the Health Records Act, an individual has the right to seek and obtain access to any personal information which Queenwood 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 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 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.

## **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.