



1. RATIONALE

Camberwell Grammar School ("the School") is bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). In relation to health records held by the School, the School is also bound by the Health Records Act 2001 (Vic). This statement outlines how the School uses and manages personal information provided to, or collected by, it.

2. POLICY STATEMENT

The School recognises and acknowledges that the protection of an individual's privacy is important and required under the relevant legislation. This policy explains how the School protects the privacy of personal information and health information which the School collects and uses. It explains how the School may use such information and to whom such information may be disclosed, how individuals can access and correct their personal information held by the School, lodge a complaint in relation to alleged breaches of privacy or make any related enquiry.

3. APPLICATION

All members of School staff, contractors and volunteers must comply with this policy in relation to any personal information they handle in the course of carrying out their duties on the School's behalf.

Personal information may be collected from any individual with whom the School may have contact (including current and prospective students and their parents/carers/guardians ("Parents"), alumni, job applicants, volunteers, contractors, past employees and other members of the community).

The School may also collect, use and disclose health information in relation to the provision of health services to students while they are in the care of the School.

Exception in relation to employee records: Although records of staff are exempt under the Privacy Act 1988 (Cth), the School is bound to maintain the confidentiality of such records in accordance with the requirements of the Fair Work Act 2009 (Cth).

4. TYPES OF INFORMATION THE SCHOOL COLLECTS AND HOLDS

The type of information the School collects and holds includes (but is not limited to) personal, health and sensitive information (collectively known as Personal Information).

- Personal Information – includes, but is not limited to: name, address, phone number, date of birth, next of kin details, financial information, photos, school reports and attendance records.
- Sensitive Information – includes, but is not limited to: religion, government identifiers, nationality, country of birth, relevant child protection law information, criminal records, language spoken at home, family court orders.
- Health Information – includes, but is not limited to: medical records, nutrition and dietary requirements, disabilities, doctor/hospital reports, illnesses, individual health care plans, immunisations, WorkCover information, learning details.

5. COLLECTION OF PERSONAL INFORMATION

The School will usually collect Personal Information directly from the individual, unless it is unreasonable or impracticable to do so, or consent has been provided, or it is required by law.

The School collects and holds Personal Information about:

- Students and Parents before, during and after the course of a student's enrolment at the School;
- Job applicants, staff members, volunteers and contractors; and
- Other people who come into contact with the School.

Personal Information you provide: The School will generally collect Personal Information by way of electronic or paper-based forms, face-to-face meetings, interviews, emails, telephone calls, through financial transactions and surveillance activities such as the use of CCTV security cameras.



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.

The School issues a Privacy Statement to all Parents at the commencement of each year. Where information being collected is not specifically listed in the Privacy Statement, or where information is being used or disclosed in a manner not addressed in the Privacy Statement, a separate Privacy Statement is to be issued at the time the information is being collected, e.g. enrolments, job applications.

The School may from time to time receive unsolicited Personal Information about an individual. Where the School determines that it could not have collected such Personal Information lawfully, then the School will promptly destroy or de-identify such information.

6. WHY PERSONAL INFORMATION IS COLLECTED

The primary reason why the School collects Personal Information includes, but is not limited to:

- Providing education, pastoral care, extracurricular activities and health services;
- Providing educational trips, excursions and camps;
- Satisfying the School's insurance and legal obligations, including duty of care, child protection obligations;
- Keeping parents informed of School community matters through correspondence, newsletters and magazines;
- Marketing, promotional and fundraising activities;
- Supporting the activities of the School associations such as Old Camberwell Grammarians' Association and Parents' Association;
- Employing and managing staff employment;
- Engaging and managing contractors and volunteers

In some cases where a request for Personal Information is not fulfilled, the School may not be able to enrol, or continue the enrolment of a student, engage or employ a staff member, volunteer or contractor.

7. USE AND DISCLOSURE OF PERSONAL INFORMATION

The School may disclose Personal Information to other schools, government departments, medical practitioners, people providing services to the School (e.g. specialist visiting teachers, sports coaches), assessment and educational authorities (e.g. Australian Curriculum Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities), parents and guardians/carer, and other recipients from time to time.

The School only uses or discloses Personal Information about an individual in the following circumstances including:

- for the primary purpose for which it was collected;
- with the individual's consent;
- for a secondary purpose which is related to the primary purpose of collection (or directly related in the case of sensitive information), and where the individual would reasonably expect or consent to;
- where required or authorised by or under law;
- where the School reasonably believes that the use or disclosure is necessary to prevent serious threats to life, health or public safety and it is unreasonable or impracticable to obtain consent;
- where the School has reason to suspect that unlawful activity or misconduct of a serious nature relating to its functions or activities has been engaged in and the use or disclosure is necessary in order for it to take appropriate action;
- where the School believes the use or disclosure is necessary to assist with locating a person reported as missing.



7.1. Photographs/Images

Photographs and images of students, staff, alumni and visitors are used in many instances via the School's Magazine, Bulletin, Website and other public relations material, for both internal and external promotion of the School and its activities. Specific permission is obtained from Parents with regards to the use of student photographs at the time of the annual record check. Where the Parent does not consent to their child's name, image and likeness being used by the School in this manner, the School will take all reasonable steps to refrain from using their child's name, image and likeness.

7.2. Disclosure to overseas recipients

The School may disclose Personal Information to recipients outside Australia in certain circumstances, such as arranging student exchange programs, organising an overseas school trip, using overseas online or 'cloud' service providers to provide services to the School.

The School will take all reasonable steps to not disclose Personal Information to overseas recipients unless:

- consent is received from the individual (in some cases this consent will be implied); or,
- the School is satisfied that the overseas recipient complies with the Australian Privacy Principles or other applicable privacy legislation; or,
- the School reasonably believes that the use or disclosure is necessary to lessen or prevent serious threat to life, health or public safety and it is unreasonable or impracticable to obtain consent; or,
- the School is taking appropriate action against suspected unlawful activity or misconduct of a serious nature; or
- the School is assisting with locating a person reported as missing.

8. SENSITIVE AND HEALTH INFORMATION

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless agreed otherwise, or where the use or disclosure of that sensitive information is allowed by law.

The School may use health information collected about an individual for the purpose of providing health services to that individual where required. The School may disclose health information to a medical professional or to a health service provider where that professional or provider is engaged in providing health services to an individual. The School will not use or disclose such information for a purpose other than the primary purpose of collection unless:

- the individual consents to the use or disclosure;
- the secondary purpose is directly related to the primary purpose and the individual would reasonably expect the School to use or disclose the information for the secondary purpose;
- the use or disclosure is required, authorised or permitted, whether expressly or impliedly by or under law; or
- as otherwise authorised, permitted or required under the Health Records Act 2001 (Vic).

9. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

The School holds Personal Information in both hard copy files and electronically. The School has various methods to protect Personal Information including, but not limited to, lockable filing cabinets with restrictive access, access restrictions to our computer systems (such as login and password protection), restricted access to our office premises, staff training and implementation of workplace policies and procedures that cover access, storage and security of information.

Staff are required to take all reasonable steps to protect the Personal Information the School holds about an individual from misuse, loss, unauthorised access, modification or disclosure.

Personal Information no longer required is destroyed in a secure manner, deleted or de-identified as appropriate.



10. ACCESS AND CORRECTION TO PERSONAL INFORMATION

The School takes all reasonable steps to ensure Personal Information collected, used and disclosed is accurate, complete and up to date.

The School encourages Personal Information to be updated by the individual using the ICT systems available, e.g. Parent Portal. Where it is not practicable, they may seek to up-date their Personal Information held by the School by visiting in person or writing to:

- Student Records Office for student information;
- Human Resources Department for staff information;
- Business Manager for contractor information;
- Heads of School for volunteer information

An individual has a right to obtain access to the Personal Information which the School holds about them and to advise the School of any perceived inaccuracy. Students will generally have access to their Personal Information through their Parents, but students over the age of 18 years may seek access and correction themselves.

The School may require a form to be completed and verification of the identity of the person requesting access to information. If the School cannot provide access to the requested information, a written notice explaining the reason for refusal will be provided. Refusals would include where release of 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 a student.

11. PRIVACY INQUIRIES AND COMPLAINTS

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact the Privacy Officer:

Email: riskcompliance@cgs.vic.edu.au

Address Risk and Compliance Manager/Privacy Officer
Camberwell Grammar School
55 Mont Albert Road
Canterbury, VIC 3126

The School may seek further information from you in order to complete an investigation and will endeavour to respond to you within 30 days.

Contact with the School can be anonymous or by use of a pseudonym. However, if you choose not to identify yourself, the School may not be able to give you the information or provide the assistance you might otherwise receive if your identity is known.

12. RELATED DOCUMENTS

SCO-MNL-001_Privacy and Data Breach Manual
SCO-POL-001_Data Breach Policy

13. RELEVANT LEGISLATION

Privacy Act 1988 (Cth)
Victorian Information Privacy Principles (Vic)
Health Privacy Principles (Vic)
Surveillance Devices Act 1999 (Vic)
Children's Services Act 1996 (Vic)
Children's Services Regulations 2009 (Vic)

Approver Staff Executive Committee
Authoriser Council