



ST ANDREW'S
CATHEDRAL SCHOOL

Privacy *Policy*

2022-10-31



*A Kindergarten to Year 6 school
for First Nations children within
St Andrew's Cathedral School*

ABN: 34 429 367 893
CRICOS Registration: The Council of
St Andrew's Cathedral School 02276M

St Andrew's Cathedral School
Gadigal Country
Sydney Square
Sydney NSW 2000, Australia
T +61 2 9286 9500

www.sacs.nsw.edu.au

Privacy *Policy*

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1. Purpose

This Privacy Policy is to inform individuals about the practices of St Andrew's Cathedral School (the School) in relation to personal information. It also serves as a guide to the School's staff as to the standards to be applied in respect of handling personal information and ensure consistency in the School's approach to privacy.

2. Overview

The School respects and is committed to protecting privacy. This Privacy Policy informs how personal information, and students sensitive information is processed and used. The School will use personal information, only in ways that are compatible with this Privacy Policy. This Privacy Policy discloses what information we gather, how we use it, and how to correct or change it.

St Andrew's Cathedral School may, from time to time, review and update this Privacy Policy taking account of legislation and other changes to the School's operations and practices.

3. Scope

Except where otherwise specified, "staff" in this policy refers to both teaching and non-teaching staff employed by the School, as well as itinerant music teachers, casual relief staff, coaches, volunteers and contractors.

This Policy should be read in conjunction with any other relevant St Andrew's Cathedral School Policies.

4. Responsibilities

4.1 School Council

All policy is under the governance of the School Council. Council determines our policies and establish criteria for compliance.

4.2 Head of School

The Head of School has a responsibility to articulate the School's obligation to Privacy in appropriate guideline documents such as the Privacy Policy and Procedures document.

4.3 School Executive

The School Executive is responsible for:

- ensuring that employees are aware of and understand the policy;
- monitoring and, where necessary, enforcing policies; and
- providing leadership by example.

4.4 Deputy Heads of School

- Reproduce the Privacy Policy and Procedures' document and ensuring each member of staff is issued with one;
- Implement training for all teaching staff (Secondary and Primary), Non-Teaching staff and the School Executive;
- Implement training for all new staff as part of the St Andrew's Cathedral School Induction Program (Teaching and Non-Teaching);
- Conduct debrief and performance reviews; and
- Responsible for all matters contained within the Privacy Policy and Procedure document which relate to the staff and students of the School and their adherence to the procedures contained therein.

4.5 Privacy Officer (Registrar)

- Review documents for practical and operational matters in liaison with Deputy Head of School and Business Manager; and
- Co-ordinate the development and implementation and audit of Privacy procedures in all areas of the School.

4.6 Employees

All employees share a responsibility to ensure:

- They have read, understood and implement the Privacy Policy and Procedures document; and
- They lead by example to students and other members of the School community.

5. Review of this Policy

This policy will be reviewed by the School Executive regularly.

6. Privacy Policy

This Privacy Policy sets 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. In relation to health records, the School is also bound by the *New South Wales Health Privacy Principles* which are contained in the *Health Records and Information Privacy Act 2002 (Health Records 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.

7. Personal information and collection approach

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 (note that the *Australian Privacy Principles* do not apply to employee record); and
- 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 or a reference from another school.

Exception in relation to employee records: Under the *Privacy Act* and 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 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.

8. Use of personal information

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. 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; and
- 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; and
- 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.

9. Disclosure and storage of information

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

- another school;
- government departments;
- medical practitioners;
- people providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- recipients of School publications, such as newsletters and magazines;
- Parents;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

Sending and storing 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); or
- otherwise complying with the *Australian Privacy Principles* or other applicable privacy legislation.

The School may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

10. 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. 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.

11. Management and security of 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.



12. Responding to data breaches

The School will take appropriate, prompt action if we have reasonable grounds to believe that a data breach may have, or is suspected to have occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC). If we are unable to notify individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

13. Access and correction of personal information

Under the *Commonwealth Privacy Act [and the Health Records 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 Head of School 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.

14. Consent and right of access to student information

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 Head of School. 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 so warranted.

15. 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 Registrar on 9286 9500 or enrolments@sacs.nsw.edu.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.



16. Document control

Document Name	Privacy Policy
Confidentiality	External
Document Status	Approved
Version Number	1
Author	Privacy Officer (Registrar)
Owner	School Executive
Version Date	19 January 2018 (Data breaches)
Date of Next Review	December 2021

17. Approval

Approver	Date of Approval
School Executive	12 March 2014



Appendix A – Collection Notice (re student information)

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 pupil and to enable them to take part in all the activities of the School. The School may not be able to enrol or continue to enrol a pupil if it does not collect some or all of the information.
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 from time to time discloses personal and sensitive information to others for administrative and educational purposes, including to facilitate the transfer of a pupil to another school. This includes to other schools, government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, music tutors, sports coaches, volunteers and counsellors.
6. Personal information collected from pupils is regularly disclosed to their parents or guardians.
7. The School may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. The School's Privacy Policy sets out how parents or pupils may seek access to personal information collected about them. However, there will be occasions when access is denied. 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.
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. As you may know the School from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. 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 and on our website. Photographs of pupil activities such as sporting events, school camps and school excursions may be taken for publication in School newsletters and magazines and on our intranet.
12. 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, that they can access that information if they wish and that the School does not usually disclose this information to third parties.



Appendix B – Collection Notice (re staff)

1. In applying for a position with the School you will be providing St Andrew's Cathedral School with personal information. We can be contacted at 9286 9500, teaching@sacs.nsw.edu.au, or support@sacs.nsw.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 contains details of how you may complain about a breach of the APPs or how you may seek access to personal information collected about you. 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.
4. We usually only disclose this kind of information to the following types of organisations: Office of the Children's Guardian (for Working with Children Check status).
5. We are required to conduct a criminal record check under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. 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, that they can access that information if they wish and that the School does not usually disclose the information to third parties.
7. If the School does not collect some or all of the information requested, it may not be able to proceed with the employment process.