



# PRIVACY POLICY

## Your privacy is important

This Privacy Policy sets out how Ruyton Girls' School manages personal information provided to or collected by the School.

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 Victorian 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 School operations and practices and to make sure it remains appropriate to the changing school environment.

## Contact details

Ruyton Girls' School 12 Selbourne Road, Kew 3101 Telephone (03) 9819 2422 Facsimile (03) 9818 4790 Email [ruyton@ruyton.vic.edu.au](mailto:ruyton@ruyton.vic.edu.au) Website [www.ruyton.vic.edu.au](http://www.ruyton.vic.edu.au)

## What kind of personal information does the School collect and how does the School collect it?

The type of information the School collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the School;
- parent involvement whilst 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 held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, and telephone calls. On occasions people other than Parents and students 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.

An employee record is defined broadly to be a record of personal information relating to the employment of an employee. Examples of this type of information include the terms and conditions of employment, personal contact details, performance and conduct, disciplining, salary, termination and trade union membership.

The exemption will only apply to an employee record held by the employing organisation. Once the record is disclosed to another entity, the exemption will cease to apply. Acts of employers who use employee information for commercial purposes outside the employment context will not be exempt from the operation of the Privacy Act.

### **How will the School use the personal information you provide?**

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, or to which you have consented.

**Students and Parents:** in relation to personal information of students and Parents, the School's primary purpose of collection is to enable the School to provide schooling for the student. This includes satisfying the needs of Parents, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School.

The purposes for which the School uses personal information of students 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 students' educational, social and medical wellbeing;
- seeking donations and marketing for the School;
- ongoing engagement with parents and students beyond their school years; 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 student or Parent, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the student or permit the student 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
- or insurance purposes
- seeking donations and marketing for the School
- 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 POR, ORA, FORMA, etc. 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 be a quality learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to an organisation that assists in the School's fundraising, for example, the School's Foundation or ORA, or, on occasions, external organisations that assist the School in stakeholder management and have appropriate procedures in place to comply with the Commonwealth Privacy Act.

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.

**Photographs:** as part of its regular activities, Ruyton may take photographs of staff, students and other participants in the life of the school to record and celebrate student effort and achievement. These images may be published in the school website, social media, newsletters, information booklets, the Ruyton Reporter and other Ruyton magazines, or prospectuses.

If you do not wish photographs of yourself or your daughter to be included in these publications please advise the Director of Community Relations at [community@ruyton.vic.edu.au](mailto:community@ruyton.vic.edu.au) so that your images are not selected for publication. If the School does not receive an objection from you, it will be assumed that you have consented to allow the School to use photographs (which may include images of yourself and/or your daughter) for the purposes described above and in the publications identified above.

The School will seek your separate consent before publishing an image of yourself and/or your daughter where the name of the person in the image is disclosed in the publication or where the photo involves a specific activity, purpose or publication not identified above.

**Year Level Contact Lists:** we may include students' and parents/guardians' contact details in a Year Level contact list. If you do not want your contact details to be included in the list, please inform the Director of Community Relations at [community@ruyton.vic.edu.au](mailto:community@ruyton.vic.edu.au) so that your details can be removed.

### **Who might the School disclose personal information to?**

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, like newsletters and magazines;
- Parents;
- anyone you authorise the School to disclose information to;
- anyone to whom we are required to disclose the information to by law.

**Sending information overseas:** the School may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia or 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)
- otherwise complying with the National Privacy Principles.

### **How does the School treat 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

### **Management and security of personal information**

The School's staff are required to respect the confidentiality of students' 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.

In the event that a data breach considered 'notifiable' under the Privacy Act<sup>1</sup> occurs, the School will notify the individuals affected by the breach and also the Office of the Australian Information Commissioner (OAIC).

### **Access and correction of personal information**

Under the Commonwealth Privacy Act and 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. Students will generally be able to access and update their personal information through their Parents, but older students 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 Principal 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 a written notice to explain the reasons for refusal.

### **Consent and rights of access to personal information of students**

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 student to the student's Parents. The School 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.

As mentioned above, parents may seek access to personal information held by the School about them or their child by contacting the Principal. 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 student.

The School may, at its discretion, on the request of a student grant the student access to information held by the School 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 so warranted.

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<sup>1</sup> A 'notifiable data breach' is defined as a data breach that is likely to result in serious harm to any of the individuals to whom the information relates. Serious harm could include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

## **Enquiries and complaints**

If you would like further information about the way the School manages the personal information it holds, or wish to make a complaint that you believe that the School has breached the Australian Privacy Principles please contact the Business Manager. The School will investigate any complaints and will notify you of the decision in relation to your complaint as soon as is practicable after it has been made.

***Updated: October 2017***