



## **PRIVACY POLICY**

### **PARED LIMITED and the PARED Schools in NSW**

This Privacy Policy outlines how PARED Limited (“PARED”) and its Schools which operate in New South Wales (as listed below), manage personal information provided to PARED Ltd and/or its Schools:

#### **PARED Schools situated in NSW**

*Tangara School for Girls*

*Redfield College*

*Montgrove College*

*Wollemi College*

*Retaval Belfield*

*Retaval Wahroonga*

Pared and its Schools are bound by the Australian Privacy Principles as contained in the Commonwealth Privacy Act 1988 (‘the Privacy Act’). In relation to health records, PARED and its School/s are also bound by the Health Privacy Principles which are contained in the Health Records and Information Privacy Act 2002 (NSW) (‘Health Records Act’).

PARED Ltd and the Schools, may from time to time, review and update its Privacy Policy to take account of new laws and technology, changes to PARED and or the school/s operations and practices and to make sure it remains appropriate to the changing school environment.

#### **Personal information kept by PARED and its Schools and the manner in which it is collected**

The type of information PARED and its Schools collect and hold 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, 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 School 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, absence notes, medical reports and names of doctors);
- complaint records and investigation reports;
- leave details;
- photos and videos at School 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 PARED and its Schools, including names and contact details and any other information necessary for the particular contact with PARED and/or its School/s.

***Personal information you provide:***

PARED and its Schools will generally collect personal information about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, and telephone calls. On occasion, people other than parents and students provide personal information.

***Personal Information provided by other people***

In some circumstances PARED and/or its Schools 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 Health Records Act, the Australian Privacy Principles and Health Privacy Principles do not apply to employee records. As a result, this Privacy Policy does not apply to PARED or its Schools' treatment of an employee record, where the treatment is directly related to a current or former employment relationship between PARED or its School/s and employee.

***How PARED and its Schools use personal information provided***

PARED and its School/s will use the 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.

***Students and parents***

In relation to personal information about students and parents, PARED and the School/s primary purpose is to enable it to provide schooling to students enrolled at the School/s, exercise its duty of care and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School. This includes satisfying both the needs of parents and the needs of the student throughout the whole period they are enrolled at the School. The purposes for which PARED and the School/s use 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;
- to look after students' educational, social and medical wellbeing;
- to seek donations and marketing for the Schools;
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

Where PARED or its School/s request personal information about a student or parent, if the information requested is not obtained, 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, PARED and the School'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 PARED or the School uses personal information of job applicants and contractors include:

- to administer the individual's employment or contract, as the case may be;
- for insurance purposes;
- to seek donations and marketing for the Schools;
- to satisfy PARED and the School's legal obligations, for example, in relation to child protection legislation.

### ***Volunteers***

PARED or the School also obtains personal information about volunteers or those who assist the PARED and the School in their functions or conduct associated activities, such as alumni associations, to enable PARED or the School and the volunteers to work together.

### ***Marketing and Fundraising***

PARED and the School treats marketing and seeking donations for the future growth and development of the Schools as an important part of ensuring that the Schools continue to be quality learning environments in which both students and staff thrive. Personal information held by PARED or its Schools may be disclosed to an organisation that assists in the Schools' fundraising, for example, a School's Foundation or alumni organisation. 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.

### **Disclosure of personal information by the School**

PARED or its School/s may disclose personal information, including sensitive information held about an individual for education, administrative and support purposes. This may include:

- other Schools and teachers at those Schools;
- government departments;
- medical practitioners;

- people providing education, support and health services to the School, including specialist visiting teachers, volunteers, counsellors, sports coaches 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 PARED and/or its Schools;
- recipients of School publications, like newsletters and magazines;
- students, parents and guardians;
- anyone who individuals have authorised the School to disclose information to; and
- anyone to whom individuals have authorised PARED and/or its Schools to disclose information by law, including child protection laws.

### **Sending or storing information overseas**

PARED or its Schools may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, PARED or the Schools 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.

PARED or its Schools may use online or 'cloud' service providers to store personal information and to provide services to PARED and its Schools 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. This 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.

An example of such cloud service providers is Google and Microsoft Office 365.

For instance, Google provides the "Google Apps for Education" (GAFE) including Gmail, and stores and processes limited personal information for this purpose. School personnel and the AIS (Association of Independent Schools) and its service providers may have the ability to access, monitor, use or disclose emails, communications (\* e.g. instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.

### ***How PARED and the School treats sensitive information***

In referring to 'sensitive information', we mean information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or practices, philosophical beliefs, 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 otherwise agree, or the use or disclosure of the sensitive information is allowed by law.

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

PARED and its Schools' staff are required to respect the confidentiality of students and parents' personal information and the privacy of individuals.

PARED and its Schools have in place steps to protect the personal information PARED and its Schools 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 to and correction of Personal Information**

Under the Privacy Act, an individual has the right to seek and obtain access to any personal information held by PARED or the School/s about them and to advise PARED and the School/s 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 any information PARED or its Schools holds about you or your child, please contact the School Principal or School Administrator in writing. PARED or its School will require parents to verify their identity and specify what information they require. PARED or the School may charge a fee to cover the cost of verifying an application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance. If we cannot provide you with access of that information, we will provide you with written notice explaining the reasons for refusal.

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

PARED and its Schools respect every parent's right to make decisions concerning their child's education. Generally, the Schools will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. PARED and the Schools 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 PARED and the Schools about them or their child by contacting the Principal in writing. 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.

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

### **Enquiries and complaints**

If you would like further information about the way PARED and its Schools manage the personal information it holds, or wish to complain that you believe that PARED or its Schools have breached the Australian Privacy Principles, please contact the School Principal or Headmaster. 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.

*November 2016*