

# WOODLEIGH SCHOOL

## PRIVACY POLICY

### POLICY CATEGORY: GOVERNANCE AND RISK

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## 1. POLICY OBJECTIVE

THE PURPOSE OF THIS POLICY IS TO SET OUT HOW WOODLEIGH SCHOOL MANAGES THE PERSONAL INFORMATION PROVIDED TO, OR COLLECTED BY, THE SCHOOL. THE POLICY OUTLINES THE CIRCUMSTANCES IN WHICH WE OBTAIN PERSONAL INFORMATION, HOW WE USE, DISCLOSE, STORE AND DISPOSE OF THAT INFORMATION, AND HOW WE MANAGE REQUESTS TO ACCESS AND/OR CHANGE THAT INFORMATION.

### 1.1. SCOPE

This policy applies to all Personal Information received, collected and held by the School.

This policy applies to all Woodleigh School staff, volunteers, contractors and Board Directors.

This policy applies to all Personal Information held by the school regardless of how, when or where it is accessed.

## 2. POLICY SECTION

Woodleigh School (Woodleigh, or the School) collects Personal Information about students, parents/guardians and staff as part of supporting the educational, operational and pastoral functions of the school. The School is committed to protecting the privacy of all individuals from whom Personal Information is collected. All members of our community have the right to understand how their personal information will be stored, used and disposed of.

Woodleigh manages and protects Personal Information in accordance with the Australian Privacy Principles (APPs) as contained in the Privacy Act 1988 (Cth). In relation to Health Information, Woodleigh is also bound by the Health Privacy Principles (HPPs) as contained in the Health Records Act 2001 (Vic).

### 2.1 DEFINITIONS

**Personal Information:** Information or an opinion about an identified individual, or an individual who is reasonably identifiable. It includes Sensitive Information and Health Information.

**Health Information:** Information or an opinion about an individual's health or disability, the health services provided or to be provided to them, their expressed wishes for the provision of future health services, Personal Information collected in order to provide a health service, Personal Information collected in connection with organ and body part donation and predictive genetic information.

**Sensitive Information:** Personal Information about a person's racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union or other professional or trade association membership, sexual preferences or criminal record, and includes Health Information and genetic information.

**Staff:** Means any employee, contractor, volunteer or other personnel engaged by Woodleigh (including teachers, coaches, instructors, etc).

### 2.2 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The Personal Information that Woodleigh collects and holds about individuals depends upon the nature of the individual's relationship and interactions with the School.

Information collected and held may include, but is not limited to, Personal Information (including Sensitive Information) about the following:

- Students and their parents/legal guardians.
- Employees, contractors and volunteers, and prospective employees, contractors and volunteers.
- The School's suppliers and their employees.
- Other individuals who come into contact with the School.

Generally, Woodleigh collects and holds information such as:

- Names, addresses and other contact details, next of kin, dates of birth, citizenship and passport details, employment history, education and qualifications, and feedback from individuals relating to the School.
- Government identifiers (such as Tax File Number), information about an individual's nationality, country of birth, professional association memberships, family court orders and criminal records.
- Information about students' medical history or medical conditions, immunisation details, asthma and anaphylaxis action plans, and reports from medical or allied health professionals.
- Financial information and bank account details.
- Other information that may assist the School in providing educational services to its students, complying with its legal obligations or marketing/promoting the School.

### 2.3 WHAT PERSONAL INFORMATION DO WE COLLECT ?

#### 2.3.1 SENSITIVE INFORMATION

The School is required by law to seek consent from an individual (or from a parent/guardian, if the individual is a student) before collecting Sensitive Information unless an exception applies, and will do so in writing. This includes Health Information.

### 2.3.2 PERSONAL INFORMATION (OTHER THAN SENSITIVE INFORMATION) PROVIDED DIRECTLY TO WOODLEIGH

Where reasonable and practical to do so, Woodleigh collects Personal Information directly from the individual (or from a parent/guardian, if the individual is a student).

Woodleigh generally collects Personal Information directly via the following means:

- Face-to-face meetings, telephone calls, and written and verbal communications.
- Forms filled out by students or parents/guardians.
- Activity logs, cookies and other data obtained from tracking technologies on the School's website and interactive learning portals.

Woodleigh has, where possible, attempted to standardise the collection of Personal Information by using specific forms (e.g. our Application Forms). However, given the nature of the School's operations, Woodleigh often also receives Personal Information by email, letters, notes, via our website, over the telephone, in face-to-face meetings and through financial transactions.

If you provide the School with the Personal Information of others, such as other family members, doctors or emergency contacts, we encourage you to obtain their consent and inform them that you are disclosing that information to the School and why, so that they can request access and correct that information if they wish. You should also refer them to this Policy for further details about such requests and how the School otherwise handles personal information it collects.

### 2.3.3 PERSONAL INFORMATION (OTHER THAN SENSITIVE INFORMATION) PROVIDED BY OTHERS

Woodleigh may also receive Personal Information about an individual from third parties, e.g. where the School uses a third party provider to manage event registrations or conduct surveys, where the School receives a report from a medical professional about an individual, or where the School receives academic data or employment references from other schools.

We may collect information based on how individuals use our website. We use "cookies" and other tracking technologies to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns and to record statistics on web traffic. We do not use this information to personally identify individuals.

### 2.3.4 UNSOLICITED INFORMATION

Woodleigh may be provided with Personal Information without having sought it through our normal means of collection. This is known as

"unsolicited information" and is often collected via the following means:

- Misdirected postal mail.
- Misdirected email or text messages.
- Unsolicited employment applications.
- Additional information provided to the School which was not requested by the School.

Unsolicited information obtained by the School will only be held, used and/or disclosed if it is considered to be Personal Information that could have been collected by lawful means. If that unsolicited information could not have been collected by lawful means then we will destroy, permanently delete or de-identify the personal information as appropriate.

### 2.3.5 EMPLOYEE RECORDS

Employee records are not covered by the APPs or the HPPs (except if the records contain Health Information). However, the School will use best efforts to ensure that the information is accurate, up-to-date, held securely within the organisation and disposed of in a secure manner.

## 2.4 HOW DOES WOODLEIGH USE OR DISCLOSE PERSONAL INFORMATION?

Woodleigh only collects Personal Information (including Sensitive Information) from or about an individual where it is reasonably necessary for the performance of one or more School business functions or activities.

The primary purpose for which we use and disclose Personal Information is to provide education and pastoral services to our students, and effectively communicate with their parents. This extends the following:

- Providing education, pastoral care, and extra-curricular services to students.
- Complying with legal obligations that apply to the School and Staff, including duty of care and child protection obligations.
- Ensuring the health and wellbeing of students.
- Keeping parents informed as to School community matters through correspondence, newsletters and magazines.
- Identifying issues with and making improvements to the School's day-to-day operations, including training our Staff.
- Systems development; developing new programs and services; undertaking planning, research and statistical analysis.
- Administration, including for insurance purposes.
- Assessing and (if successful) engaging prospective Staff, and making improvements to the recruitment process.
- In relation to prospective and current Staff, assessing the suitability of Staff to perform their required duties.

Personal information collected from pupils is regularly disclosed to their

parents or guardians. On occasions, information such as academic, cultural, personal and sporting achievements, student activities and events, and similar news and images (including images and recordings where pupils or parents are reasonably identifiable) are published in School newsletters, magazines, brochures, local and/or national newspapers, school promotional material and on our website. This may include photographs and videos of student activities such as sporting events, concerts and plays, school camps and school excursions.

The School may use or disclose Sensitive Information for a secondary purpose if consent has been provided, or if the individual (or their parent/guardian) would reasonably expect the School to use or disclose the information for that purpose and the secondary purpose is directly related to the primary purpose, or if some other exception applies.

If the School does not collect, hold, use or disclose such Personal Information (including Sensitive Information), or if consent is not given, the School may not be able to enrol or continue the enrolment of a student. Further, the School may not be able to offer a student the full complement of the School's educational services and programs.

## 2.5 WHICH ORGANISATIONS MAY THE SCHOOL DISCLOSE PERSONAL INFORMATION TO?

Woodleigh may disclose Personal Information to another school, government agencies, medical practitioners, people or organisations providing services to the School, including specialist visiting teachers, counsellors, music instructors and sports coaches, related entities and other recipients. The school may also share information in line with State and Federal legislation and requirements.

We may share personal information with related bodies corporate.

Organisations with which we may share information include:

- Victorian Institute of Teaching
- Victorian Registration and Qualifications Authority
- TASS (our administration system)
- SEQTA (our learning management system)
- Microsoft for Microsoft Office 365 (<https://www.microsoft.com/en-au/trust-center/privacy?docid=23>)
- Google suite for education ([https://edu.google.com/intl/en\\_au/why-google/privacy-security/](https://edu.google.com/intl/en_au/why-google/privacy-security/))
- Operoo for school medical record management and consent (<https://www.operoo.com/privacy-policy/>)
- Pixevety for school photo & video management and consent (<https://portal.pixevety.com/public/privacy-policy.pdf>)
- Passtab for school sign-in and induction records (<https://passtab.com/privacy.html>)
- Grammarly for writing assistance (<https://www.grammarly.com/privacy-policy>)
- Seesaw for demonstrating and sharing learning (<https://web.seesaw.me/privacy-policy>)

- PTO for organising parent teacher interviews (<https://parentteacheronline.com.au/privacy-policy/>)

### 2.5.1 MARKETING & FUNDRAISING

Marketing and seeking donations for the future growth and development of the School is as an important part of ensuring that the School continues to provide a quality learning environment for students.

The School may, from time to time, use Personal Information (other than Sensitive Information) that it collects directly from individuals to communicate with them about School-related events, services and products that may be of interest, including:

- Marketing, promotional and fundraising activities.
- Supporting the activities of school associations such as Woodleigh School Alumni
- Supporting the activities of the Woodleigh School Building Fund
- Supporting community-based causes and activities, charities and other causes in connection with the School's functions or activities
- Working with third party organisations that assist in the School's fundraising

School publications, like newsletters and magazines, which include Personal Information, may also be used for marketing purposes.

Information may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without consent.

The School will provide a simple "opt-out" mechanism for individuals who do not want to receive these types of communications.

### 2.5.2 DISCLOSURE OF YOUR PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

Personal Information about an individual is likely to be disclosed to an overseas organisation in the course of providing our services, for example when storing information with a "cloud service provider" which stores data outside of Australia or to facilitate a student exchange program. In doing so, we will use our best endeavours to ensure that overseas providers comply with procedures under the APPs.

## 2.6 STORAGE AND SECURITY OF PERSONAL INFORMATION

Woodleigh School stores Personal Information in a variety of formats including, but not limited to the following:

- On databases and school computers.
- Hard copy/paper based files.
- On personal devices, including laptop computers.
- Using third party storage providers such as cloud storage facilities.

Woodleigh takes all reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

These steps include, but are not limited to the following:

- Restricting access and user privilege of information by staff depending on their role and responsibilities.
- Ensuring staff do not share personal passwords.
- Ensuring access to Woodleigh’s premises is secure at all times.
- Ensuring our IT and cyber security systems, policies and procedures are implemented and up to date.
- Ensuring staff comply with internal policies and procedures when handling the information.
- The destruction, deletion or de-identification of personal information we hold that is no longer needed, or required to be retained, by any other laws.

Our public website and app may contain links to other third-party websites outside of Woodleigh School. Woodleigh School is not responsible for the information stored, accessed, used or disclosed on such websites and we cannot comment on their privacy policies.

### 2.6.1 ELECTRONIC STORAGE OF INFORMATION

The School uses computers and online tools, such as apps and other software, to collect and manage Personal Information. These tools enable the school to efficiently and effectively manage important information about students and also to communicate with members of our community and other persons that interact with the school. Computer systems, networks and related facilities may be monitored and logged. Personal Information may be collected through the usage of these systems. The primary purpose of these processes is to safely manage the school IT facilities.

The School does its best to ensure that Personal Information is secure on its computers, servers and online. The School uses current firewall technology and utilises a range of security software to manage access to data. School servers are contained in secure rooms with permission-based access enabled. Access to computer systems is permission based. Staff laptops are encrypted, and password policies applied.

The School also uses third party online 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 cloud computing resources, email and communication tools, education and assessment applications. Some Personal Information may also be provided to these providers to enable them to authenticate users that access their services. This Personal Information may reside on a cloud service provider’s server which may be situated outside Australia.

The School utilises surveillance systems, including CCTV and security/access card usage. The primary purpose of these systems is for security. CCTV captures video footage whilst security/access cards record the user details and date and time of usage. Logs of these systems are used for security purposes and are held for a maximum of 90 days.

## 2.7 RESPONDING TO DATA BREACHES

Woodleigh 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 action, notifying affected individuals, and for notifiable data breach cases, the Office of the Australian Information Commissioner (OAIC).

If the data breach is considered notifiable and we have been unable to contact the affected individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of that statement in other formats.

## 2.8 THE QUALITY OF PERSONAL INFORMATION

We take all reasonable steps to ensure the Personal Information we hold, use and disclose is accurate, complete and up-to-date, including at the time of using or disclosing the information. If Woodleigh School becomes aware that the Personal Information is incorrect or out of date, we will take reasonable steps to rectify the incorrect or out of date information.

## 2.9 ACCESS AND CORRECTION OF PERSONAL INFORMATION

Individuals may submit a request to us to access the Personal Information we hold, or request that we change the Personal Information. Upon receiving such a request, we will take steps to verify the individual’s identity before granting access or correcting the information.

There may, however, be occasions when access is denied. Such occasions 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 any student, where persons have provided information in confidence or where the School is otherwise required or authorised by law to refuse access.

If we reject the request, you will be notified accordingly. Where appropriate, we will provide the reason(s) for our decision unless, given the grounds for refusal, it would be unreasonable to provide reasons. If the rejection relates to a request to change Personal Information, an individual may make a statement about the requested change and we will attach this to their record.

We may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested, and will advise the likely cost in advance.

We respect every parent and guardian’s right to make decisions concerning their student’s education. Generally, we will refer any requests for consent and notices in relation to the Personal Information of a student to their parent or guardian. Unless a student is deemed to be a competent minor, we will treat consent given by a parent or

guardian as consent given on behalf of the student, and notice to them will act as notice given to the student.

Students will generally have access to their Personal Information through their parent or guardian, however competent minors may seek access themselves. In accordance with the APPs, we may, at our discretion, grant a student with access to their Personal Information held by the School, or allow a student to give or withhold consent to the use of their Personal Information, independent of their Parents or Guardians. This would normally be done only when the maturity of the student and/or the student's personal circumstances warranted it.

### 2.10 COMPLAINTS

An individual can make a complaint about how Woodleigh manages Personal Information by notifying us in writing. We will respond to the complaint within a reasonable time (usually no longer than 30 days) and we may seek further information in order to provide a full and complete response.

If the individual is not satisfied with our response, they may refer the complaint to the Office of the Australian Information Commissioner (OAIC). A complaint can be made using the OAIC online Privacy Complaint form or by mail, fax or email. A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

### 2.11 HOW TO CONTACT US

Woodleigh School can be contacted about this Privacy Policy or about Personal Information generally, by:

- Emailing Principal's Office at [principalsoffice@woodleigh.vic.edu.au](mailto:principalsoffice@woodleigh.vic.edu.au)
- Calling (03) 5971 6100
- Writing to our Privacy Officer at 485 Golf Links Road, Langwarrin South, VIC 3911

You can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

### 2.12 CHANGES TO OUR PRIVACY AND INFORMATION HANDLING PRACTICES

Woodleigh may update this policy without notice if our information handling practices change.

Please check our Privacy Policy on our website <https://www.woodleigh.vic.edu.au/> for any updates.

## 3. POLICY COMPLIANCE

### 3.1 POLICY BREACH

A breach of this policy or procedure may lead to disciplinary action which is outlined further in our:

- Consequence and Breach policy (in development)

All breaches and risks related to this policy should be reported to The Principal.

Compliance with this Policy will be monitored by the Principal and Privacy Officer and this may include independent audits and reviews.

## 4. RELATED POLICIES, PROCEDURES AND LEGISLATION

### 4.1 WOODLEIGH SCHOOL POLICY AND PROCEDURE LINKAGE

- Policy Framework
- Child Safety and Protection Policy
- Child Safety and Mandatory Reporting Policy
- Employment Collection Notice
- Student Collection Notice
- Volunteer Collection Notice
- Contractor Collection Notice

### 4.2 RELATED LEGISLATIVE INSTRUMENTS

The following legislation, standards and regulations apply and this policy aligns with these mandated requirements:

- Privacy Act 1988 (Cth)
- Education and Training Reform Act 2006 (Vic);
- Child Wellbeing and Safety Act 2005 (Vic);

Further information on this policy can be obtained from:

- The Principal
- The Privacy Officer