



King's Baptist Grammar School

Policy: Privacy Policy

Audience: Parents, Staff, Students, KOSA members, Volunteers, Contractors and visitors of King's

Rationale: This Privacy Policy sets out how King's Baptist Grammar School [King's] manages personal information provided to or collected by it. King's is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988.

Policy Position:

What kinds of personal information does King's collect and how does King's collect it?

The type of information King's collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at King's, including:
 - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
 - parents' education, occupation and language background;
 - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
 - results of assignments, tests and examinations;
 - 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, and medical certificates);
- 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 King's, including name and contact details and any other information necessary for the particular contact with King's.

Personal Information you provide: King's 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, emails and telephone calls. On occasions, people other than Parents and students provide personal information.

Personal Information provided by other people: In some circumstances King's 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, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to King's' treatment of an employee record, where the treatment is directly related to a current or former employment relationship between King's and employee.

The purposes for which and how King's use the personal information you provide?

King's 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.

Students and Parents: In relation to personal information of students and Parents, King's primary purpose of collection is to enable King's to provide schooling to students enrolled at King's, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of King's. This includes satisfying the needs of Parents, the needs of the student and the needs of King's throughout the whole period the student is enrolled at King's.

The purposes for which King's 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 King's;
- looking after students' educational, social and medical wellbeing;
- seeking donations and marketing for King's; and
- to satisfy King's' legal obligations and allow King's to discharge its duty of care.

In some cases, where King's requests personal information about a student or Parent, if the information requested is not provided, King's 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 and contractors: In relation to personal information of job applicants and contractors, King'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 King's uses personal information of job applicants and contractors include:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for King's; and
- satisfying legal obligations for King's, for example, in relation to child protection legislation.

Volunteers: King's also obtains personal information about volunteers who assist King's in its functions or conduct associated activities, such as Parents and Friends and KOSA, to enable King's and the volunteers to work together.

Marketing and fundraising: King's treats marketing and seeking donations for the future growth and development of King's as an important part of ensuring that King's continues to provide a quality-learning environment in which both students and staff thrive. Personal information held by King's may be disclosed to organisations that assist in fundraising.

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.

Who might King's disclose personal information to and store your information with?

King's may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to King's, including specialist visiting teachers, coaches, volunteers, and counsellors;
- providers of specialist advisory services and assistance to King's, including in the area of Human Resources, child protection and students with additional needs;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;
- people providing administrative and financial services to King's;
- recipients of School publications, such as newsletters and magazines;
- students' parents or guardians;
- anyone you authorise King's to disclose information to; and

- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Sending and storing information overseas: King's may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, King's 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.

King's may use online or 'cloud' service providers to store personal information and to provide services to King's 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.

How does King's treat sensitive information?

In referring to 'sensitive information', King's 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

Staff at King's are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

King's has in place steps to protect the personal information King's 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 and correction of personal information

Under the Commonwealth Privacy Act, an individual has the right to seek and obtain access to any personal information which King's holds about them and to advise King'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 to update any personal information King's holds about you or your child, please contact Student Services in writing. King's may require you to verify your identity and specify what information you require. King's 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, King's 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 (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons).

Consent and rights of access to the personal information of students

King's respects every Parent's right to make decisions concerning their child's education.

Generally, King's will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. King's 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 King's about them or their child by contacting the Principal. However, there may 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 King's duty of care to the student.

King's may, at its discretion, on the request of a student grant that student access to information held by King's 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 warrant it.

Operational Aspects: If you would like further information about the way King's manages the personal information it holds, or wish to complain that you believe King's has breached the Australian Privacy Principles, please contact the Director of Business, Darren McDonald – 8289 0222 or in writing via email to darren.mcdonald@kingsbaptist.sa.edu.au . King's will investigate any complaint and will notify you of the making of any decision in relation to your complaint as soon as is practicable.

Definitions: 'Parent' is interchangeable with 'Carer' or 'Guardian'

Sensitive Information means – information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other related professional trade or association membership, philosophical beliefs, sexual orientation or practices or criminal record that is also personal information, health information and biometric information about an individual.

References: Commonwealth Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Related Policies: Parent Grievance Policy

Review: King's may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to King's operations and practices and to make sure it remains appropriate to the changing school environment.

Policy approved by the Principal on 4 August, 2020

Communication: The Privacy Policy will be available on the School website and on the intranet and is the responsibility of the Director of Business, Darren McDonald.

Version Control: via the Director of Business, Darren McDonald.