

Privacy Policy

Status	Approved
Effective	April 2024
Review	April 2026
Owner	Principal
Approver	The Sycamore School Governing Body

1 Purpose

The Sycamore School is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth). This Privacy Policy sets out how the School manages personal information and your rights in relation to your personal information, including how to complain and how we deal with complaints. The Sycamore School will collect, hold, use and disclose personal information as set out in this policy. 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. The current version of this Privacy Policy is published on our website.

2 Scope

This policy and procedure is to be followed by a person who fills the role with a .

- Staff (all employees (full-time, part-time, permanent, fixed term, casual or relief), apprentices/trainees, host employees, people doing work experience or vocational placement)
- Directors
- Contractors
- Parents/Carers
- Students
- Visitors
- Volunteers
- Others

3 Definitions/Acronyms

APP	Australian Privacy Principles
ICT	Information and Communication Technology
Our/We/Us	The Sycamore School
Parents	Parents, Guardians, and/or Carers

Personal information	Is defined by the <i>Privacy Act 1988</i> (Cth) as identifiable information including individuals name, signature, address, telephone number, email, date of birth, and credit history.
Sensitive information	Is a type of personal information and includes information about: <ul style="list-style-type: none"> • an individual’s racial and ethnic origin; • health information, religious beliefs, philosophical beliefs, sexual orientation and preferences, marital status; • criminal record.

4 Personal Information that is Collected by The Sycamore School and How it is Collected

The type of information collected and held by us includes (but is not limited to) personal information, including health and other sensitive information, about:

- Students and parents and/or guardians 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, gender, language background, previous school, and religion;
 - parents' education, occupation, language spoken at home, nationality and country of birth;;
- health information (e.g. details of disability and/or allergies, absence notes, immunisation details, 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 Family Court orders;
 - criminal records;
 - volunteering information;
 - photos and videos at School events.
- Job applicants, staff, 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;
 - health 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.

- Other people who come into contact with us, including name and contact details and any other information necessary for their particular contact with us.

Personal information you provide:

We 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, we 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 or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

Surveillance and monitoring:

We reserve the right to monitor all staff and student ICT user activity to ensure compliance with legal, ethical, and acceptable use expectations. Generally, this will reflect the content of BYOD Participation Agreements for students, separate policies on Acceptable Use of ICT for Students and Acceptable Use of ICT for staff, and for staff, the Employee Code of Conduct. We also use video surveillance as part of school safety and security management.

Exception in relation to employee records:

Under the *Privacy Act 1988* (Cth), the Australian Privacy Principles do not apply to certain treatment of an employee record. As a result, this Privacy Policy does not apply to our treatment of an employee record where the treatment is directly related to a current or former employment relationship between us and an employee.

5 The Sycamore School Use of Personal Information You Provide

We will use personal information collected 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:

Our primary purpose in collecting personal information of students and parents is to enable us to provide schooling and school activities to the student at the School, exercise our duty of care, and perform necessary associated administrative activities which enables students to take part in all the activities of the School. This includes satisfying the needs of parents, the needs of the students and the needs of the School throughout the whole period the student is enrolled at the School.

The purposes for which personal information of students and parents is used includes:

- making required reports to government authorities;
- to keep parents informed about matters related to their child's schooling, through correspondence, apps, newsletters, and magazines;

- day-to-day administration of the School;
- looking after student's educational, social, and health wellbeing;
- seeking donations and marketing for the School;
- to satisfy our legal obligations and allow the School to discharge its duty of care.

In some cases where we request personal information about a student or parent, if the information requested is not provided, we 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:

Our primary purpose in collecting personal information of job applicants and contractors is to assess and (if successful) to engage the applicant or contractor.

The purposes for which we use 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 the School; and
- satisfying our legal obligations, for example, in relation to child protection legislation.

Volunteers:

We also obtain personal information about volunteers who assist the school in its functions or conduct associated activities, such as alumni associations, to enable us to contact you and administer the volunteer position; for insurance purposes; and satisfying the School's legal obligations, for example, in relation to child protection legislation.

Marketing and fundraising

We treat marketing and seeking donations for the future growth and development of the School as an important part of ensuring that we continue to provide a quality learning environment in which both students and staff thrive. Personal information held by us may be disclosed to organisations that assist us 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 subject to consent.

If you would like to opt-out of direct marketing, please contact us by emailing admin@sycamore.qld.edu.au

6 Who Might The Sycamore School Disclose Personal Information to and Store Information With?

We may disclose personal information, including sensitive information, held about an individual for educational, care and administrative purposes. This may include to:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;;
- government departments (including for policy and funding purposes);

- medical practitioners;
- people providing educational, support and health services to us, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
- organisations that assist us with fundraising (see the 'Fundraising' section of this Privacy Policy)
- providers of specialist advisory services and assistance to us, including in the area of Human Resources, child protection, students with additional needs and for the purpose of administering Google Apps for Education and ensuring its proper use;
- 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 us;
- recipients of School publications, such as newsletters and magazines;
- students' parents or guardians;
- anyone you authorise us to disclose information to; and
- anyone to whom we are required or authorised to disclose to by law, including child protection laws.

How we store personal information:

We store your personal information in hard copy and electronically. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information.

Sending and storing information overseas:

We 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.

We may use online or 'cloud' service providers to store personal information and to provide services to us 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 and provide technical support. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

An example of such a cloud service provider is Microsoft. Microsoft provides us with Office 365 including Outlook, and stores and processes limited personal information for this purpose. The School 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 Office 365 and ensuring its proper use.

7 The Sycamore School's Treatment of Sensitive Information

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.

8 The Sycamore School's Management and Security of Personal Information

Our staff are required to respect the confidentiality of information and the privacy of individuals.

We have steps in place to protect the personal information we hold 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.

These steps include:

- Restricting access to information on the School databases on a **need-to-know** basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Implementing physical security measures around the School buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.

9 Access and Correction of Personal Information held by The Sycamore School

Under the Commonwealth Privacy Act an individual has the right to seek and obtain access to, and/or correction of, any personal information which we hold about them and to advise us 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 we hold about you or your child, please contact the Principal on (07) 3117 0966 or email admin@sycamore.qld.edu.au. We may require you to verify your identity and specify what information you require. We may charge a reasonable fee to cover the cost of verifying your application and locating, retrieving, reviewing, and copying any material requested (but will not charge for the making of the request or to correct your personal information). If the information sought is extensive, we 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 the grounds for refusing means it would be unreasonable to provide reasons) and how to complain.

10 Consent and Rights of Access to the Personal Information of Students at The Sycamore School

We respect every parent's right to make decisions concerning their child's education.

Generally, we will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. We 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 us about them or their child by contacting the Principal by (07) 3117 0966 or email admin@sycamore.qld.edu.au. However, there may be occasions when access is denied. Such occasions may include (but are not limited to) where the School believes the student has capacity to consent and the School is not permitted to disclose the information to the Parent without the student's consent, 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 our duty of care to the student.

We may, at our discretion, on the request of a student grant that student access to information held by us 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.

11 Enquiries and Complaints

If you would like further information about the way we manage the personal information we hold or wish to make a complaint if you believe that we have breached the Australian Privacy Principles, please contact the Principal on (07) 3117 0966 or email admin@sycamore.qld.edu.au. We will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made. If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

12 Related Legislation

- Privacy Act 1988 (Cth) Australian Privacy Principles

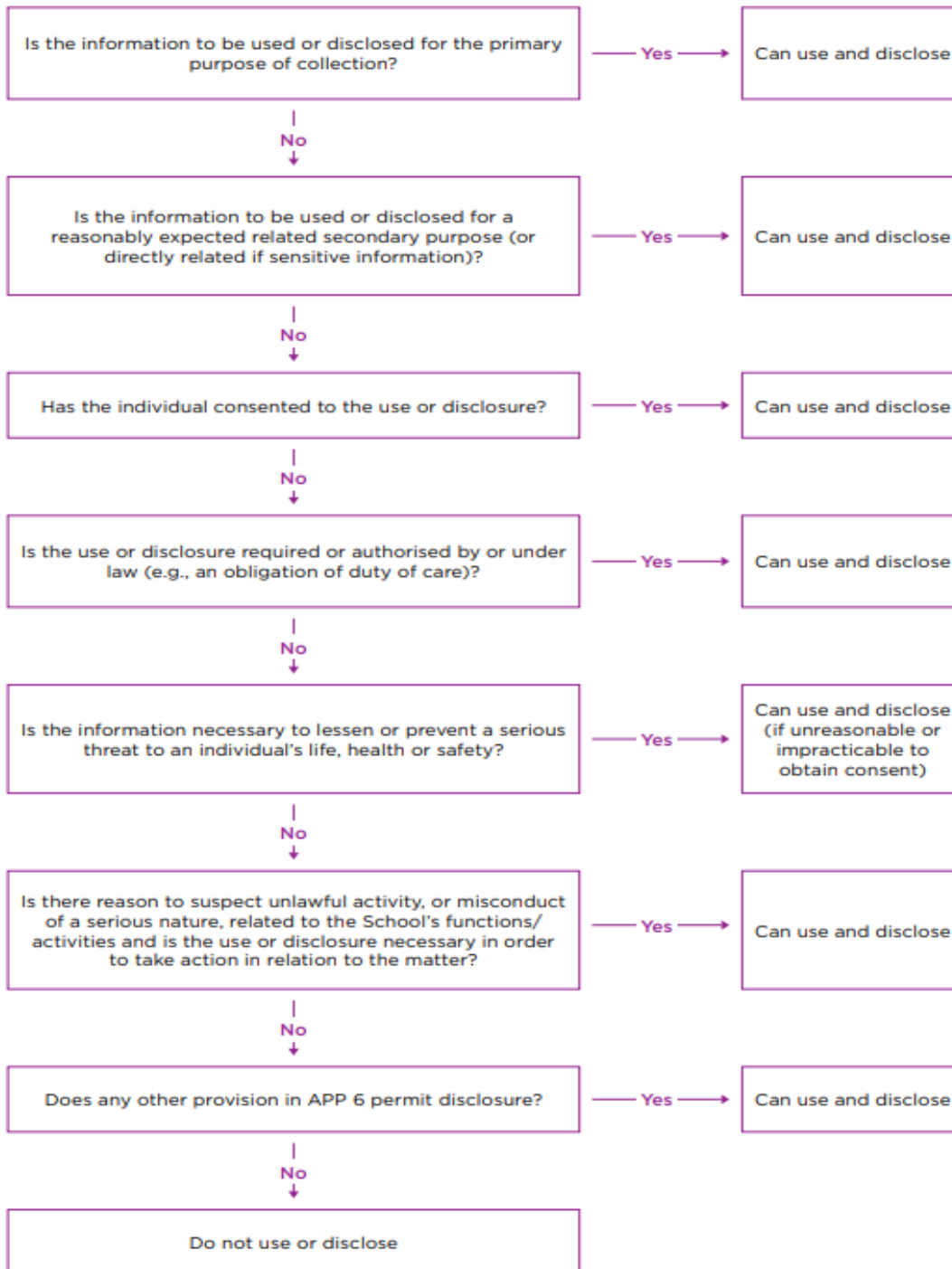
13 Related Documents

- *Privacy Compliance Manual APRIL 2023 - A manual for schools that are members of an association of Independent schools and schools and systems that are represented by the National Catholic Education Commission.*
- *Acceptable Use of ICT for Students*
- *Acceptable Use of ICT for Staff*
- *Employee Code of Conduct*
- *Child Protection Policy*

14 Procedures

Use and disclosure table

Use and disclosure compliance steps - Table 4D



15 Document History

Version	Description of modification	Modified by	Date
1.4	Update with data from Privacy Compliance Manual APRIL 2023 and use of updated template policy	Vanessa Lyle	17 April 2024
1.3	Policy transferred to new template Collection of COVID-19 vaccination information Surveillance and monitoring Use and disclosure table	Sandra Stuckey	12/05/2022
1.2	Policy updated	Ronwyn Collier	20/09/2018
1.1	New policy		