



PRIVACY POLICY

MANAGEMENT OF PERSONAL INFORMATION

Preamble

At The Knox School (**the School**), we recognise the importance of your privacy and understand your concerns about the security of the personal information you provide to us.

We comply with the Australian Privacy Principles (**APPs**) as contained in the *Privacy Act 1988* (Cth). The APPs detail how personal information may be collected, used, disclosed, stored and destroyed and how an individual may gain access to or make complaints about the personal information held about them.

In relation to health records, the School is also bound to comply with the Health Privacy Principles as contained in the *Health Records Act 2001* (Vic).

Personal Information is information or an opinion about an identified individual or about an individual who is reasonably identifiable.

Sensitive Information (a subset of personal information) is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.

Health Information is 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 to provide a health service, personal information collected in connection with organ and body-part donation and predictive genetic information.

This policy details how the School manages personal information provided to or collected by it.

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.

What Personal Information We Collect and Hold

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

- Pupils - before, during and after the course of the pupil's enrolment at the School;
- Parents and/or guardians (**parents**) - before, during and after the course of the pupil's enrolment at the School;
- Job applicants, staff members, volunteers and contractors;
- Business partners; and
- Other people who come into contact with the School.

The following kinds of personal information are what we commonly collect and hold from or about:

Information	Pupils	Parents	Job applicants, staff members, volunteers and contractors	Business Partners
name	✓	✓	✓	✓
address	✓	✓	✓	✓
phone	✓	✓	✓	✓
fax and mobile numbers	✓	✓	✓	✓
email address	✓	✓	✓	✓
date of birth and age	✓	✓	✓	
gender	✓	✓	✓	
nationality and cultural background	✓	✓		
religious beliefs or affiliations	✓	✓		
birth certificate	✓			
parent details	✓			
family composition details	✓	✓		
emergency contact and next-of-kin details	✓	✓	✓	
languages spoken	✓	✓	✓	
academic details	✓		✓	
academic history	✓		✓	
school reports	✓			
academic assessments	✓			
conduct and behaviour reports	✓			
medical and health history information	✓	✓	✓	
health fund details	✓	✓	✓	
Medicare number	✓	✓	✓	
immunization records	✓			
allergy treatment plans	✓			
dietary requirements	✓			
requirements for special needs or learning disabilities	✓			
physical psychological and psychometric assessments	✓			
applicable welfare and agency referrals	✓			
applicable marital, custody and parenting orders	✓	✓		
photographs	✓		✓	
occupation		✓		
bank account or credit card details		✓		
vehicle registration details		✓		✓
police background checks			✓	
Working With Children Checks			✓	
professional association memberships			✓	
union memberships			✓	

Others

When you browse our website or interact with us electronically, we record geographical tagging, cookies, and statistical data.

How We Collect and Hold Personal Information

We aim to collect personal information only directly from the individual concerned, unless it is unreasonable or impracticable for us to do so.

Personal information you provide

We will generally collect personal information from you or about you from forms filled out by pupils or parents, face-to-face meetings and interviews, telephone calls and general correspondence, as well as your activity on our website, interactive learning portals and social media platforms.

Personal information provided by other people

However, in some instances we may receive personal information about you from third parties, such as reports from medical professionals or academic data and references from other schools. If you provide the School with the personal information of other people (eg. doctors and emergency or next-of-kin contacts), we encourage you to inform them that you are disclosing their information to the School and why.

Anonymity and Pseudonymity

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

Cookies

We may collect cookies to enable us to tell how and when users use our website. This information can include your IP address, browser type, domain names, access times, pages within the website which you visit and referring website addresses. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may limit your browsing experience. Cookies help us provide you with a better experience when using our website and assist our marketing efforts.

Links to other websites

Our website may contain links to other third party websites of interest. Using these links will take you to third party websites that we do not control. We are not responsible for the protection and privacy of any information that you provide while visiting any third party websites. Third party websites are not governed by this Privacy Policy. You should exercise caution when using third party websites and read the privacy statement applicable to the website in question.

Sensitive Information

We may collect sensitive information from you or about you where there is a legal requirement to do so, or where we are otherwise permitted by law. In all other situations, we will specifically seek your consent.

Why We Collect, Hold and Use Personal Information

We collect, hold and use personal information (including sensitive information) from you or about you where it is necessary for us to operate our School business functions and activities and for related and directly-related purposes. The primary purpose for which we hold personal information is to provide education to our pupils.

Pupils and Parents

We collect, hold and use personal information (including sensitive information) about pupils and parents to enable the School to provide education and schooling for the pupil and to effectively communicate with parents. This includes:

- providing curricular, co-curricular and extra-curricular education and programs for pupils;
- looking after pupils' education, social and medical well-being;
- satisfying the School's legal obligations under legislation including the Education Act, the Public Health and Wellbeing Act, child protection and mandatory reporting laws;
- allowing the School to discharge its duty of care;
- keeping parents informed about matters related to the pupil's schooling, through correspondence, newsletters and magazines; and
- day to day administration.

In some instances, if we do not collect, hold or use such personal information (including sensitive information), or if you do not consent, then we may not be able to enrol or continue the enrolment of a pupil. We also may not be able to offer any, or our full complement of educational services and programs.

Job Applicants, Staff Members and Contractors

We collect, hold and use personal information (including sensitive information) about job applicants, staff members and contractors to:

- assess and (if successful) employ or engage the applicant, staff member or contractor (as the case may be);
- administer the individual's employment or engagement (as the case may be);
- fulfil the School's insurance obligations; and
- satisfy the School's legal obligations under legislation including workplace health and safety laws and child protection laws.

Note that the APPs do not apply to personal information held in an employee record in certain specified circumstances. Accordingly, this Privacy Policy does not apply to the School's treatment of an employee record, where such treatment is directly related to a current or former employment relationship between the School and the employee.

Volunteers

We collect, hold and use personal information (including sensitive information) about volunteers who assist the School in its functions and/or who organise and conduct associated activities such as the Alumni Association, the School Council and event-based fetes etc.

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 pupils and staff thrive. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising and marketing activities.

Personal information about pupils, parents, staff members and volunteers etc is commonly published on our website, in periodic newsletters and in the School magazine. Such personal information may include photographs, video footage and other information about academic achievements, School excursions and other School events and programs. We seek to obtain specific permission from the individuals involved prior to publication for such uses.

School publications, like newsletters, magazines, DVDs and photographs, which include personal information, may be used for marketing purposes. Opt out procedures are included in our various consent forms for specific programs and uses. Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications. Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

Why We Disclose Personal Information

The School may disclose personal information, including sensitive information, to:

- other schools, early learning centres, tertiary institutions and admissions centres;
- government departments for reporting educational, health and statistical purposes;
- medical practitioners and allied health professionals;
- people or organisations providing complementary services, co-curricular and extra-curricular programs to the School, including specialist visiting teachers, sports coaches, music instructors, chaperones, camp providers, holiday program operators and "sister schools";
- contracted service providers to the School, including transport operators, counsellors, nurses, canteen operators, uniform providers, ticketing agencies, IT, marketing and fundraising organisations and associations;
- parents and family members; and
- anyone to whom you authorise the School to disclose information.

In some instances, if we do not disclose such personal information, or if you do not consent, then we may not be able to enrol or continue the enrolment of a pupil. We also may not be able to offer any, or our full complement of educational services and programs. We may also disclose your personal information to third parties (including government departments and enforcement bodies) where required or permitted by law.

How We Hold and Store Personal Information

Your personal information is held and stored on paper, by electronic means or both. We have physical, electronic and procedural safeguards in place for personal information and take reasonable steps to ensure that your personal information is protected from misuse, interference and loss and from unauthorised access, modification and disclosure:

- data held and stored on paper is stored in lockable filing cabinets within secure premises with monitored alarms;
- data held and stored electronically is protected by internal and external firewalls, and access is limited by network and file passwords;
- data held and stored "in the Cloud" is protected by internal and external firewalls, and access is limited via file passwords and encryption. We also require our IT contractors and other third parties to implement privacy safeguards;
- data stored or archived off-site is contained within secure facilities. We also require our storage contractors to implement privacy safeguards;
- where we disclose personal information to third parties (including contractors and affiliated organisations located both locally and overseas), our contractual arrangements with them include specific privacy requirements;
- our staff and volunteers receive regular training on privacy procedures.

Destruction and De-Identification

We will retain your personal information whilst it is required for any of the School's functions, or for any other lawful purpose. We use secure methods to destroy or to permanently de-identify your personal information when it is no longer needed:

- paper records are shredded and/or sent for secure destruction.
- electronic records are deleted from all locations to the best of our ability and where possible they are archived, encrypted and/or placed beyond use.

Overseas Disclosure

The School is affiliated with a range of people and organisations located overseas. For example, we offer a range of international self-funded study, sporting and "sister school" tours, and we support overseas charities through sponsorship arrangements. In some instances, we are likely to disclose some of your personal information to overseas recipients. However, we will only do so where:

- it is necessary to complete or complement the education or program being offered or provided to the pupil; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

Currently, our overseas affiliates are located in Japan, China, Cambodia, New Zealand, Hong Kong, Singapore and Germany.

Requests for Access and Correction

We have procedures in place for dealing with and responding to requests for access to, and correction of, the personal information held about you. Pupils may generally access their personal information through their parents. However, older pupils may seek access themselves.

The School may require you to verify your identity and specify what information you require. We 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, we will advise the likely cost in advance.

In most cases, we expect that we will be able to comply with your request. However, if we do not agree to provide you access or to correct the information as requested, we will give you written reasons why. For further information, please contact us at principal@knox.vic.edu.au.

To assist us to keep our records up-to-date, please notify us at registrar@knox.vic.edu.au of any changes to your personal information.

Pupil Consent and Rights of Access

The School respects 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 pupil to the pupil's parents. We will treat consent given by parents as consent given on behalf of the pupil, and notice to parents will act as notice given to the pupil.

Parents may seek access to personal information held by the School about them or their child by contacting the School 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 pupil.

The School may, at its discretion, on the request of a pupil grant that pupil access to information held by the School about them, or allow a pupil 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 pupil and/or the pupil's personal circumstances so warranted.

Complaints and Concerns

We have procedures in place for dealing complaints and concerns about our practices in relation to the Privacy Act, the APPs and the Health Records Act. We will respond to your complaint in accordance with the relevant provisions of the Privacy Act or the Health Records Act. For further information, please contact us at principal@knox.vic.edu.au.

Contact

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