



PRIVACY POLICY

PURPOSE

The purpose of this Privacy Policy is to clearly communicate how St Hilda's Anglican School for Girls (St Hilda's or School) manages personal information by explaining:

- what, how and why personal information is collected, used, disclosed, secured, accessed, corrected, amended and retained; and
- how to make a Privacy complaint.

SCOPE

This policy outlines the circumstances in which St Hilda's obtains personal information, how we use and disclose that information and how we manage requests to access and/or change that information.

The policy applies to the entire St Hilda's community in collecting, holding, accessing and using personal and sensitive information, from and about, but not limited to:

- Current and prospective students;
- Current and prospective parents/guardians;
- Current and prospective employees;
- Old Scholars;
- Current and prospective donors;
- Current and prospective suppliers and contractors;
- Volunteers;
- Users of the School's facilities and services; and
- Attendees at events or activities.

DEFINITIONS

Eligible data breach: An eligible data breach under the *Privacy Act* (Cth) 1988 is either:

- Unauthorised access or disclosure of personal information where a reasonable person would conclude that the disclosure or access is likely to result in serious harm to those individuals affected; or
- Where information is lost in circumstances where unauthorised access or disclosure is likely to occur and assuming that if unauthorised access or disclosure were to occur, a reasonable person would conclude that the disclosure or access is likely to result in serious harm to the affected individuals.

Health Information: is a subset of sensitive information. It is any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided, currently or in the future, to an individual that is also personal information. Health information also includes personal information collected while providing a health service.

Personal Information: means information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not, and whether the information is recorded in a material form or not. It includes all personal information regardless of its source. Common examples are an individual's name, signature, address, telephone number, date of birth, employment details, bank account details etc.

Sensitive Information: is a subset of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information and biometric information, includes biometric templates generated from an individual's facial features for the purpose of identification.

POLICY STATEMENT

1. COLLECTION OF PERSONAL INFORMATION

The types of information the School collects and holds 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;
- Job applicants, staff members, volunteers and contractors; and
- Any other people who may come into contact with the School.

The School will collect personal information where that information is reasonably necessary for the performance of one or more functions and/or activities of the School.

The way in which St Hilda's collects personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, the School will collect personal information directly from you.

Where possible the School has attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form or a Health Information Disclosure Form). However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face to

face / online meetings and interviews, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring.

We may also collect personal information from other people (e.g. a personal reference or a report provided by a medical professional) or independent sources (e.g. a telephone directory), however we will only do so where it is not reasonable and practical to collect the information from you directly. This personal information will be treated in the same manner as if it were collected by the School.

The School also collects biometric information (facial recognition templates) through its photo management platform, Pixevety. This occurs solely for the purpose of managing photo consent across school media. Collection applies to students, staff, and others whose images appear in school photos or media. Biometric templates are generated automatically when images are uploaded to Pixevety and are not used for any other purpose.

2. USE OF PERSONAL INFORMATION

The School will use personal information it collects only for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and that would be reasonably expected by you, or to which you have consented.

St Hilda's collects and uses personal information relating to students and parents for the purpose of delivering educational services and supporting student wellbeing. When selecting, implementing, and managing digital technologies and online services, the School will prioritise the best interests, safety, wellbeing, educational needs, and privacy of children. Where appropriate, the School may provide consent on behalf of a student or parent for the use of technologies that support educational, administrative, wellbeing, or student safety outcomes. The School undertakes reasonable due diligence to assess the suitability, privacy, security, and child safety implications of such technologies and may disclose personal information to carefully selected third-party service providers where reasonably necessary to support these purposes.

All third parties engaged by the School are required to handle personal information in accordance with applicable privacy laws and contractual obligations to protect confidentiality and security. Where possible, the School ensures that only the minimum amount of personal information necessary for the function or service is disclosed.

Providing schooling and education services includes, but is not limited to:

- pre-enrolment matters;
- day to day administration including for insurance purposes;
- looking after student's educational, social, pastoral and medical wellbeing;
- satisfying our legal obligations including our duty of care and child protection obligations;
- keeping parents informed as to school community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;

- supporting the activities of school associations such as St Hilda's Parents & Friends' Association, GHS & St Hilda's Old Scholars Association, St Hilda's Foundation Inc;
- supporting community based causes and activities, charities and other causes in connection with the School's functions or activities; and
- helping us to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis.

The school's primary purpose for collection of personal information of job applicants, staff members, contractors and volunteers is to assess suitability for engagement, for administering contracts, insurance purposes and to satisfy legal obligations, for example, in relation to child protection matters.

3. STORAGE AND SECURITY OF PERSONAL INFORMATION

The School may store personal information in a variety of formats including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

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.
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- 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.
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.
- Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. We do not share your personal information with those websites, and we are not responsible for their privacy practices. Please check their privacy policies.

4. DISCLOSURE OF PERSONAL INFORMATION

The School may disclose personal information for the purposes for which it was provided to us, or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities. The School may disclose personal information to government agencies, other parents, other schools, recipients of school publications, visiting teachers, medical practitioners, counsellors and coaches, our service providers, agents, contractors, business partners and other recipients from time to time, if:

- you have consented; or
- you would reasonably expect us to use or disclose your personal information in this way; or
- we are authorised or required to do so by law; or
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- where another permitted general situation or permitted health situation exception applies; or
- disclosure is reasonably necessary for a law enforcement related activity.

Student information can be shared by the Commonwealth (including Tuition Protection Service (TPS)), and state or territory agencies.

5. PERSONAL INFORMATION OF STUDENTS

The Privacy Act does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information.

At St Hilda's, we take a commonsense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students and we will treat consents provided by parents/carers as consents provided by a student.

We are however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older students and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents directly from students. We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others or result in a breach of the School's duty of care to the student.

Where the School collects biometric information about students, express consent is obtained from the student's parent or guardian prior to collection. Parents may independently request exclusion from automated facial recognition processing at any time. Such requests should be directed to the School.

6. DISCLOSURE OF INFORMATION TO OVERSEAS RECIPIENTS

We may disclose personal information about an individual to overseas recipients in certain circumstances, such as when we are organising an overseas excursion, facilitating a student exchange, or storing information with a “cloud computing service” which stores data outside of Australia. We will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- We have the individual's consent (which may be implied); or
- We have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- We form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- We are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

7. TREATMENT OF SENSITIVE INFORMATION

Sensitive information will only be used and disclosed for the purpose for which it was provided, or directly related secondary purpose, unless the provider's express agreement has been obtained to do otherwise, or the use or disclosure of the sensitive information is allowed by law.

Health information

St Hilda's collects health information about its students, staff and on occasion, parents:

- With the consent of the student or parent;
- Where it is required to enable St Hilda's to exercise its duty of care or is otherwise required or authorised by law;
- Where the School itself records incidents at school;
- Where a student suffers an injury or illness, a school nurse, school psychologist assesses, makes a diagnosis of illness or disability, treats a student and creates and maintains records of the student's progress;
- Where it is necessary to lessen or prevent a serious threat to the life, health, or safety of an individual and it is impracticable to obtain consent.

Health information will only be used or disclosed:

- for the purposes for which it was collected or a directly related secondary purpose;
- to exercise the School's duty of care or as otherwise required or authorised by law; or
- to lessen or prevent a serious threat to the life, health, or safety of an individual and where it is impractical to obtain consent.

Health information is securely stored on the School's learning management systems. .
Health information of a student is not disclosed to third parties, such as another parent

or an organisation or school which may have temporary care of the student unless the School considers it is necessary to disclose it to ensure the health or safety of the student.

The school may seek expert advice in any instance where it becomes aware of health information about a student which the student does not wish to be disclosed to a parent or both parents, unless failure to disclose this information would constitute a breach of the School's duty of care responsibility or mandatory reporting obligations.

Biometric Information

The School collects biometric information solely through the software platform Pixevety for the purpose of photo consent management. Collection is based on the express consent of the parent or guardian. Biometric information will not be used or disclosed for any purpose other than photo consent management. Any individual may request deletion of their biometric template at any time by contacting the School.

8. WEBSITE AND COOKIES

Our website uses temporary cookies. This means that upon closing your browser, the temporary cookie assigned to you will be destroyed and no personal information is maintained which will identify you at a later date.

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with this website and who are under obligations of confidentiality. You can configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the St Hilda's website and other websites may be lost.

9. QUALITY OF PERSONAL INFORMATION

The School will take reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

10. ACCESSING INFORMATION

An individual has the right to obtain access to any personal information that St Hilda's holds about them and to advise the School of any perceived inaccuracy in that information. Students will generally be able to access and update their personal

information through their parents, but older students may seek access to and correction of their personal information.

To make a request to access or update any personal information the School holds about you or your child, please contact the Principal in writing. St Hilda's may require you to verify your identity and specify what information you require.

If we cannot provide you with access to that information, you will be notified accordingly.

No application fee is charged, however an administration and copying fee may be charged. Your request will be actioned as soon as practicable.

11. HANDLING DATA BREACHES

St Hilda's is committed to protecting the security of your personal information. We use technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of information. We will take all reasonable steps to prevent your information from loss, misuse or alteration.

St Hilda's will take appropriate, prompt and necessary action if there are reasonable grounds to believe that a data breach has or is suspected to have occurred.

Depending on the type of data breach, this may include a review of internal security protocols, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

BREACH OF POLICY

Any staff that fail to comply with this policy, may be subject to disciplinary action.

SOURCE OF OBLIGATION

Privacy Act (Cth) 1988

Privacy Principles within the Privacy Act

RELATED POLICIES

Notifiable Data Breach Policy

Records Retention Schedule for Non-Government Schools

SUPPORTING DOCUMENTS

Nil.

COMPLAINTS

If you wish to make a complaint about an alleged breach by us of the Australian Privacy Principles you may do so by providing your written complaint by email, letter, facsimile or by personal delivery to any one of our contact details as noted below. You may also make a complaint verbally.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

How to Contact Us

You can contact us about this Policy or about your personal information by:

Emailing sthildas@sthildas.wa.edu.au

Calling (08) 9285 4100

Writing to our Privacy Officer at P.O. Box 34 Mosman Park WA 6912 or by facsimile at (08) 9285 4128

If practical, 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.