



Privacy Policy

Source of obligation

In the course of Caulfield Grammar School activities, we manage and protect personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the 13 Australian Privacy Principles (APPs) and Health Records Act (Vic).

Scope of Policy

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

What is personal information and how do we collect it?

Personal information is information or an opinion about a person from which they can be reasonably identified. Depending on the circumstances, we may collect personal information from a person in their capacity as a student, contractor, volunteer, stakeholder, job applicant, alumni, visitors or anyone else that comes into contact with the school.

In the course of Caulfield Grammar School activities we may collect and hold:

- Personal Information including name, address and other contact details, date of birth, next of kin details, photographic images, attendance records and financial information
- Sensitive Information (particularly in relation to student and parent records) including government identifiers (such as TFN), religious beliefs, nationality, country of birth, professional memberships, family court orders and criminal records
- Health Information (particularly in relation to student and parent records) including medical records, disabilities, immunisation details and psychological reports.

As part of our recruitment processes for employees, contractors and volunteers, we may collect and hold:

- Personal Information including name, address and other contact details, date of birth, financial information, citizenship, employment references, regulatory accreditation, media, directorships, property ownership and driver's licence information
- Sensitive Information including government identifiers (such as TFN), nationality, country of birth, professional memberships, family court orders and criminal records
- Health Information (particularly in relation to prospective employee and student records) including medical records, disabilities, immunisation details and psychological reports

Generally, we will seek consent from a person in writing before we collect their sensitive information (including health information).



Employee records are not covered by the APPs or the Health Records Act (Vic) where they relate to current or former employment arrangements between the school and the employee.

Collection of personal information

The collection of personal information depends on the circumstances in which Caulfield Grammar School is collecting this information. If it is reasonable and practical to do so, we will aim to collect this personal information directly from the individual.

Solicited information

Caulfield Grammar School, where possible, standardises the collection of personal information by using specifically designed forms (e.g. an Enrolment Form or Health Information Disclosure Form). However, we also receive personal information by email, letters, notes, via our website, over the telephone, in face-to-face meetings, 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 third-party administrator, referees for prospective employees) or independent sources. However, we will only do so where it is not reasonable and practical to collect the personal information from a person directly.

We may collect information based on how people use our website. We use 'cookies' and other data collection methods 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.

Unsolicited information

Caulfield Grammar School may be provided with personal information without having sought it. This is known as 'unsolicited information' and is often collected by:

- misdirected postal mail - Letters, Notes, Documents
- misdirected electronic mail - Emails, electronic messages
- employment applications sent to us that are not in response to an advertised vacancy
- additional information provided to us which was not requested

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

Collection and use of sensitive information

We only collect sensitive information if it is:

- reasonably necessary in the course of conducting Caulfield Grammar School activities, and we have the persons consent
- necessary to lessen or prevent a serious threat to life, health or safety



- another permitted general situation
- another permitted health situation

We may share sensitive information to other entities in our organisation structure, but only if necessary in the course of conducting Caulfield Grammar School activities.

How we use personal information

Caulfield Grammar School only uses personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or for an activity or purpose to which you have consented.

Our primary uses of personal information include, but are not limited to:

- providing education, pastoral care, co-curricular and health services
- 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 magazine
- marketing, promotional and fundraising activities
- supporting the activities of school associations such as The Caulfield Grammarians' Association
- supporting the activities of the Caulfield Grammar Foundation
- supporting community-based causes and activities, charities and other causes in connection with the School's functions or activities
- helping us to improve our day-to-day operations including training our employees
- systems development; developing new programs and services; undertaking planning, research and statistical analysis
- school administration including for insurance purposes
- the employment of employees
- the engagement of volunteers

We will only use or disclose sensitive or health information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose. For example in the case of a medical emergency.

We may share personal information to related bodies corporate in the course of conducting Caulfield Grammar School activities.

Caulfield Grammar School may disclose information about a person to overseas recipients only when it is necessary, for example to facilitate a student exchange program or excursions. The school will not however send information about a person outside of Australia without their



consent.

Storage and security of personal information

Caulfield Grammar School stores Personal Information in a variety of formats including, but not limited to:

- databases
- hard copy files
- personal devices, including laptop computers
- third party storage providers such as cloud storage facilities
- paper based files

Caulfield Grammar School 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:

- restricting access and user privilege of information by employees depending on their role and responsibilities
- ensuring employees do not share personal passwords
- ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Employee access is subject to user privilege
- ensuring access to Caulfield Grammar School's premises are secured at all times
- implementing physical security measures around the school buildings and grounds to prevent break-ins
- ensuring our IT and cyber security systems, policies and procedures are implemented and up to date
- ensuring employees comply with internal policies and procedures when handling the information
- undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far as practicable that they are compliant with the APPs or a similar privacy regime
- 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

Responding to data breaches

The Notifiable Data Breach Scheme (NDBS) requires Caulfield Grammar School to notify individuals when their personal information is involved in a data breach that is likely to result in serious harm.



We will take appropriate, prompt action if we have reasonable grounds to believe that a serious harm data breach may have occurred.

If appropriate this may involve for example, review of our internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If we were unable to notify affected individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

Disclosure of personal information

Personal information may be disclosed to government agencies, other parents, other schools, recipients of school publications, visiting teachers, counsellors and coaches, our services providers, agents, contractors, business partners, related entities and other recipients from time to time, if the person:

- has given consent; or
- would reasonably expect the personal information to be disclosed in that manner.

Caulfield Grammar School may disclose personal information without consent or in a manner which a person would reasonably expect if:

- we are required to do so by law
- the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety
- another permitted general or health situation applies

Disclosure of your personal information to overseas recipients

Personal information about an individual may be disclosed to an overseas organisation in the course of conducting Caulfield Grammar School activities. For example information might be stored with a 'cloud service provider' who may store 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)
- we have satisfied ourselves that the overseas recipient is compliant with the APPs and Health Records Act (Vic) or any other relevant privacy regime
- 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
- we are taking appropriate action in relation to suspected unlawful activity or serious misconduct



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 Caulfield Grammar School we take a common-sense 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.

Children have rights under the Privacy Act. In certain circumstances (especially when dealing with older students and when dealing with sensitive information), it may be appropriate to seek and obtain consents directly from students. There may also be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

Additionally there may 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 students.

Accuracy 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 Caulfield Grammar 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.

Access and correction of personal information

A person 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 person's identity before granting access or correcting the information.

If we reject the request, the person will be notified accordingly. Where appropriate, we will provide the reason/s for our decision. If the rejection relates to a request to change personal information, a person may make a statement about the requested change and we will attach this to their record.

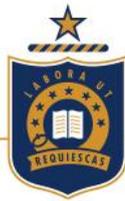
Complaints Procedure

A person can make a complaint about how Caulfield Grammar School manages personal information, including a breach of the APPs or the Health Records Act (Vic), by notifying us in writing as soon as possible. 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.

Caulfield Grammar School does not charge a fee for the handling of complaints.

If a person is still not satisfied after all avenues of resolution have been exhausted, the complaint may be referred to the OAIC.

A complaint can be made using the OAIC online [Privacy Complaint form](#) or by email or mail.



How to contact us

Caulfield Grammar School can be contacted about this Privacy Policy or about personal information generally, by:

- Emailing: CGSPrivacyOfficer@caulfieldgs.vic.edu.au
- Calling: 03 9524 6300
- Writing:

Privacy Officer
Caulfield Grammar School
217 Glen Eira Road
East St Kilda VIC 3183

A person can contact us anonymously or by using a pseudonym. However, in such circumstances, without identification, we may not practically be able to provide information or assistance.

Changes to our privacy and information handling practices

This Privacy Policy is subject to change at any time.

Please check our Privacy Policy on our website <https://www.caulfieldgs.vic.edu.au/> regularly for any changes.

Policy Name: Privacy Policy	Last updated: May 2019
Policy Owner: School Executive Committee	Date of Next review: May 2020
Reviewer: Risk and Compliance	CRICOS: 00136F
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