



Privacy Policy

PURPOSE

At Westminster School, your privacy is important.

This statement outlines Westminster School's policy on how the School uses and manages personal information provided to or collected by it.

The School is bound by the 13 Australian Privacy Principles contained in the *Commonwealth Privacy Act 1988* and *Commonwealth Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

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

POLICY AND PROCEDURE DETAIL

What kind of personal information does the School collect and how does the School collect it?

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

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the School;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the School.

Personal Information you provide: The School 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 the School 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 the School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and the employee.

Cookies: Standard tracking technology such as cookies may be used on our website. Cookies recognise a user's browser each time they visit a particular website and enables the website to track your preferences when using the site. A cookie is a small file sent by a website and stored on a user's computer for record keeping purposes but do not personally identify the user. If you do not wish to receive any cookies you may set your browser to refuse them, however use of websites may be affected.

How will the School use the personal information you provide?

The School will use personal information it collects from you for the primary purpose for which such information is collected, and for such other secondary purposes as may reasonably be expected or consented to by the provider of the information.

Students and Parents: In relation to personal information of students and parents, the School's primary purpose of



collection is to enable the School to provide schooling and educational services for the student, exercise its duty of care, and perform necessary associated administrative tasks, which will enable students to take part in all activities of the School. This includes satisfying both the needs of parents and the needs of the student throughout the whole period the student is enrolled at the School.

The purposes for which the School uses personal information of students and parents include:

- admissions and enrolment matters;
- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters, magazines and other publications;
- day-to-day administration;
- looking after students' educational, social and medical wellbeing;
- seeking donations or financial support for the School;
- drawing upon the expertise of particular members of the School community to assist with operations and functions;
- promotion and marketing of the School;
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

In some cases where the School requests personal information about a student or parent, if the information requested is not provided, the School 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, staff members and contractors: In relation to personal information of job applicants, staff members and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the School uses personal information of job applicants, staff members and contractors include:

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

Volunteers: The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as the School Council, to enable the School and the volunteers to work together.

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 students and staff thrive. Personal information held by the School may be disclosed to an organisation that assists in the School's fundraising, for example, the School's Foundation or alumni organisation.

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information, School publications, like newsletters, magazines and/or the public media (such as radio or television), which include personal information, may be used for marketing purposes.



Members of the broader School community who are not current staff or parents may elect to not be contacted by the School. All emails to the broader community will provide the option to opt out from future communications. Where persons no longer wish to be contacted by the School, both their address and email details will be removed from the database.

Who might the School disclose personal information to?

The School may disclose personal information, including sensitive information, held about an individual to:

- another school and teachers at those schools;
- government departments;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority and NAPLAN Test Administration Authorities;
- medical practitioners;
- people providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- recipients of School publications, like newsletters and magazines;
- students', parents or guardians;
- anyone you authorise the School to disclose information to;
- anyone to whom we are required to disclose the information by law, including child protection laws

Sending information overseas: The School may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' based service providers which are located outside Australia, or to facilitate a school exchange, visit or trip outside Australia, but will

- obtain the consent of the individual (in some cases this consent will be implied); or
- otherwise comply with the Australian Privacy Principles or other applicable and current privacy legislation.

The School currently uses MailChimp to manage our bulk email distribution. Please click on the link to access the Privacy Policy for MailChimp.

<https://mailchimp.com/legal/privacy/>

How does the School treat sensitive information?

In referring to 'sensitive information', the School means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or practices, criminal record, and health 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

The School's staff are required to respect the confidentiality of students' and parents' information and the privacy of individuals.

The School has in place steps to protect the personal information the School holds from misuse, loss, interference, unauthorised access, modification or disclosure by use of various methods including secure storage of paper records and password protected access rights to computerised records in combination with categorised access based on level of staff

permission.

Access and correction of personal information

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the School by contacting the School office, or we may take measures to update or correct out of date information

The Australian Privacy Principles require the School not to store personal information longer than necessary.

Under the Act (as amended), an individual has the right to obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

To make a request to access any information the School holds about you or your child, please contact the Principal in writing.

The School may require you to verify your identity and specify what information you require. The School 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, the School will advise the likely cost in advance. If we cannot provide you with access to that information, we shall provide you with written notice explaining the reason(s) for refusal.

Data Breach

The School's compliance with the Privacy Act, in particular the Australian Privacy Principles, safeguards against the risk of data breach.

A data breach occurs when personal or sensitive information held by an entity is subject to unauthorised access or disclosure or is lost. Examples of data breaches include loss or theft of physical devices (such as laptops and storage devices) or paper records that contain personal information, unauthorised access to personal information by an employee, inadvertent disclosure of personal information due to 'human error', (for example an email sent to the wrong person) disclosure of an individual's personal information to a scammer, as a result of inadequate identity verification procedures.

Data breaches potentially cause significant harm to individuals, including but not limited to, identity theft leading to emotional and psychological harm, financial loss resulting from unauthorised credit card transactions or credit fraud, family violence, physical harm or intimidation.

The Notifiable Data Breaches (NDB) scheme contained in the Privacy Act requires the School to notify individuals and the Office of the Australian Information Commissioner about eligible data breaches.

The School has a Data Breach Response Protocol in place to guide staff in action to be taken should a data breach or suspected data breach occur.

Consent and rights of access to the personal information of students

The School respects every parent's right to make decisions concerning their child's education.

Generally, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The School 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 the School about them or their child by contacting the 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 student.

The School may charge a fee to cover the cost of verifying an application for information and locating, retrieving, updating and copying any material requested. If we cannot provide an applicant with access to that information, we shall provide an explanation of the reasons(s) for the refusal.

The School may, as its discretion, on the request of a student grant that student access to information held by the School 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 so warranted.

Enquiries and complaints

If you would like further information about the way the School manages the personal information it holds, or wish to make any inquiry related to the School's compliance with the Australian Privacy Principles, please contact the Principal in writing.

The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as practicable after it has been lodged.

Related

- [Australian Privacy Principles](#)
- [Privacy Act 1988](#)
- [Privacy Amendment \(Enhancing Privacy Protection\) Act 2012](#)
- Standard Collection Notice
- Alumni Collection Notice
- Contractor/Volunteer Collection Notice
- Employment Collection Notice