



# Privacy Policy

Ratified by Council	
Date	
Name	
Signature	

<b>Provenance</b>	<b>To be Revised (Date)</b>	
	<b>Relates to Standard</b>	12. Child Abuse Prevention
	<b>Related Documents</b>	<ul style="list-style-type: none"> <li>• Enrolment Policy</li> <li>• Fee Policy</li> <li>• Recruitment Policy</li> </ul>
	<b>Links with Legislation</b>	<ul style="list-style-type: none"> <li>• National Privacy Principles contained in the Privacy Act (1988) and the Australian Privacy Principles (APPs) on 12 March 2014.</li> </ul>
	<b>Appendix</b>	

# Privacy Policy

This privacy policy outlines how we protect your privacy and how we comply with the requirements of the Privacy Act as well as the 13 Australian Privacy Principles. Within this policy further information is contained regarding;

1. Who is personal information collected from;
2. Types of personal information collected and held by us;
3. how this information is collected and held;
4. The purposes for which your personal information and seek its correction;
5. How you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled; and
6. Whether we are likely to disclose your personal information to any overseas recipients.

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.

## Who is personal information collected from?

West Coast Steiner School collects personal information from all students, parents, prospective parents, job applicants, staff, volunteers and others including, alumni contractors, visitors and parties that may come into contact with the school.

It is important to note that employee records are not covered by the Australian Privacy Principles where they relate to current or former employment relations between the school and employee.

## Personal Information Collected

The primary purpose for which the School collects personal information is to conduct the business of the school efficiently and to ensure the safety of all that attend or work at the school. The level of information collected is largely dependent on relationship to the school. The types of information the School collects and holds includes but is not limited to;

- **Personal information** such as names, addresses and other contact details. Dates of birth, next of kin, photographic images, attendance records and financial records.
- **Health Information** (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, allergy information and dietary requirements

- **Other sensitive information**, (mainly in relation to student and parent records) information (mainly in relation to student and parent records) including religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, profession, family court orders and criminal records.

## How do we collect your Personal Information?

How we collect personal information is dependent on the relationship to the School. If it is reasonable and practical to do so we will always endeavour to collect personal information directly from you.

Where possible the school has created and designed forms to aid in the ease of collection of required information. Given the nature of operations and in the interest of ease to update information this may from time to time be done by the following; email, letter, phone call or face to face meeting.

In some instances, the school may receive information from a relevant third party, such as a medical professional or another school or employer. However, we will only do so where it is not reasonable or practical to collect the information directly from you.

The school will only collect information relevant for one or more of the functions listed within this policy. If we have the consent of the individual to which the sensitive information relates, or if the collection of more detailed information is necessary to lessen or prevent serious threat to life, health or safety or another extenuating situation exists.

We will only use or disclose sensitive 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.

## Storage and Security Personal Information

The school will store personal information in variety of formats on electronic databases as well as where appropriate in hard copy files. Security of personal information is of significant importance to us. The school will take all reasonable steps to protect personal information that we hold about you from misuse, loss, unauthorised access, modification or disclosure.

Steps include:

1. Restricting access to information on the school database, to only staff who require this to fulfil their role within the School
2. Ensuring all staff are aware they are not to share personal passwords
3. Ensuring all student hard copy files are stored in lockable filing cabinets
4. Implementing physical security measures to ensure security of school buildings to prevent break ins.
5. ICT security systems and policies, designed to protect personal information stored on computer networks

6. Human resources policies and procedures, designed to ensure that staff follow correct protocols when handling personal information
7. 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.

It is important to note that some health conditions of students may require keeping information within reach within the classroom, or for specific events. This may include visible placement of information, and in some cases a photo of the person concerned. Staff and volunteers would hereby be able to quickly identify a person who may require assistance in the event of an anaphylactic shock or strong asthmatic response.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

In the unlikely event that the security of information held has or is suspected to have been compromised the school will,

- Notify individuals directly (i.e. by phone or in person)
- Notify Office of Australian Information Commissioner to inform there has been a breach and advise of corrective action taken to limit access
- Inform the School Council of the incident and actions taken

## Privacy Policy in relation to Recruitment, Employment 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;
- For insurance purposes;
- Seeking donations and marketing for the School; and
- To satisfy the School's legal obligations, for example, in relation to child protection legislation.

Personal information held about job applicants and contractors is collected solely for the primary purpose of assessing their claims to be engaged and will be used for no other purpose.

**Relief Staff and Volunteers:** The School also obtains personal information about relief staff and volunteers who assist the School in its functions or conduct associated activities, such as the West Coast Steiner School Incorporated Council, the WCSSCA Committee, to enable the School and the volunteers to work together. The School also obtains personal information about relief staff and volunteers to satisfy the School's legal obligations, for example, in relation to child protection legislation.

**Employee Records and Privacy Principles:** 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 employee. As a result, past and present employees of the School cannot automatically access the personal information held about them by the School.

## When We Disclose Personal Information

the School will use personal information for the purpose for which it was given 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. We may disclose your personal information to

- Another school;
- Government departments;
- Medical Practitioners;
- People providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- Recipients of School publications, such as newsletters and magazines;
- Parents;
- Anyone you authorise the School to disclose information to; and
- Anyone to whom we are required to disclose the information to by law.
- To meet the requirements of the Education services for Overseas students (ESOS) Act 2000, national code of standard 3.1d

Only if one or more of the following apply

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

## 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.

West Coast Steiner School takes 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.

We are however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances 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.

## How We Ensure the Quality of Your Personal Information

We take all reasonable steps to ensure that 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 the school if any of the details you have provided us have changed. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

## The Accessing and Correcting of Personal Information

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.

If we do not agree to provide you with access, or to amend your personal information as requested you will be notified accordingly. Where appropriate we will provide you with a reason/s for our decision. If the rejection relates to a request to change your personal information you make a statement about the request change and we will attach this to your record.

### Privacy Complaints

If you wish to make a complaint about a breach by us of the Australian Privacy Principles you may do so by providing your written complaint by email, letter 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:

- Email [reception@wcss.wa.edu.au](mailto:reception@wcss.wa.edu.au)
- Calling 08 9440 1771
- Writing to West Coast Steiner School, 15 Mayfair St, Nollamara WA 6061.

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.

## **Changes to our Privacy and Information Handling practices**

This policy is subject to change at any time. Please contact the Office should you require further assistance.