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1. Introduction

This Privacy Policy sets out how Brisbane Grammar School ('**School**') manages personal information provided to or collected by it, and how to contact us if you have any privacy concerns.

The School is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth).

2. What kinds of personal information does the School collect?

The School will collect different types of personal information from you, depending on how you interact with us. The type of information the School collects and holds includes (but is not limited to) personal 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.

The types of personal information the School collects may include your name, contact details and financial details.

The School will only collect sensitive information (which is a category of personal information that includes information about things like an individual's health, religious beliefs and racial or ethnic origin) from an individual with their <u>consent</u> and where reasonably necessary for one of the School's functions.

The School may collect personal information because we are required or authorised by an Australian law or court or tribunal order to do so. The School will tell you if this is the case and let you know the details of the law, court or tribunal order.

2.1. Personal Information you provide

The School will generally collect personal information directly from the individual such as through the completion of forms by Parents or students, face-to-face meetings and interviews, emails and telephone calls.

2.2. Personal Information collected from third parties

The School may collect information about a student from their Parent(s). In some circumstances, the School may collect personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.

2.3. Anonymity

If it is lawful and practicable to do so, the School may offer individuals the opportunity of dealing with the School anonymously or by using a pseudonym, such as when an individual makes a general inquiry about the School. However, 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.



3. How will the School use the personal information you provide?

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

3.1. 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 for the student. This includes satisfying the needs of Parents, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School. The purposes for which the School collects, uses, holds and discloses personal information of students and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- o looking after students' educational, social and medical wellbeing;
- o seeking donations and conducting marketing for the School;
- to enable past pupils to be in contact with those from their year group via the Old Boys' Register;
- to enable Old Boy reunion organising committees to conduct Year Group reunions as required; and
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

3.2. Volunteers

The School also collects, uses, holds and discloses personal information about volunteers who assist the School in its functions or conduct associated activities, such as alumni associations, to enable the School and the volunteers to work together.

3.3. 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 provide a quality learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising, for example the School's Old Boys' Association or, on occasions, external fundraising organisations.

The School may use your personal information to send you fundraising information and School publications (such as newsletters and magazines). You can <u>contact us</u> at any time (see details below) if you no longer wish to receive marketing or fundraising materials from us.



4. Who might the School disclose personal information to?

There are a range of people and organisations the School may disclose personal information to. The particular party the School discloses personal information to will depend on the dealings the individual has with us. For example, the School may disclose personal information, including sensitive information in certain circumstances, held about an individual 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;
- service providers who provide us with business, technology, marketing, operational, professional and other services; and
- anyone to whom we are required to disclose the information to by law.

4.1. Sending information overseas

The School may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with technology service providers which are situated outside Australia or to facilitate a school exchange. We only disclose personal information to our overseas service providers when it is necessary for the services they provide to us.

The countries in which these overseas service providers are likely to be located is Singapore, Hong Kong, Canada and the United States of America.

When we disclose your personal information overseas, we are required to take measures to ensure that your information will be protected.

5. Management and security of personal information

We mostly hold personal information electronically in our IT systems, secure servers and databases, but we also hold personal information in paper records. The School has in place steps to protect the personal information the School holds from misuse, interference and loss, unauthorised access, modification or disclosure including locked storage of paper records and password access rights to computerised records. The School's staff are also required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

6. Data breach notification

In the event of any loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, the School will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act.



7. Access and correction of personal information

An individual has the right to request access to any personal information which the School holds about them and ask the School to correct any inaccuracies.

To make a request to access or update any personal information the School holds about you or your child, please contact the School Headmaster in writing (see details below). The School will require you to verify your identity and specify what information you require. The School cannot give you information about anyone else.

Making a request is free. However, the School may charge a reasonable fee to cover the cost of locating, retrieving, reviewing and copying any material requested. The fee will not be excessive, and the School will advise the likely cost in advance.

We will allow access or make the changes requested unless we consider the Privacy Act or another relevant law requires us to withhold the information, or not make the changes. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal. If we refuse you access or to correct your personal information, you can make a complaint about this, by following the complaint procedures in this privacy policy (see details below).

8. 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 Headmaster (see details below). 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, at 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.



9. Enquiries and Complaints

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles, please contact:

The Deputy Headmaster – Staff 07 3834 5200 24 Gregory Terrace, Brisbane QLD 4000 dhm.staff@brisbanegrammar.com

The School will investigate any complaint, and respond to you as soon as we can. We will try to do this within 10 working days of receiving your complaint. If this is not possible, we will contact you and let you know when we will respond to your complaint. We will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

The School takes any privacy complaint seriously and will deal with all complaints fairly and promptly. However, if you are not satisfied with our response to your complaint you can refer your complaint to the Office of the Australian Information Commissioner (in writing):

Office of the Australian Information Commissioner (OAIC) GPO Box 5218 Sydney NSW 1042

email: enquiries@oaic.gov.au

Phone: 1300 363 992

TTY: 133 677 then ask for 1300 363 992

10. Using other websites

The School's website may contain links or references to other websites to which this privacy policy may not apply. You should review the privacy policy of each of those websites and assess whether those policies are acceptable to you before using those websites.

11. Related Documents

- Bullying Policy
- Bullying Policy: Operational Procedures for Responding to Bullying (internal School procedure for staff)
- Child Protection Policy and Child Risk Management Strategy
- Code of Conduct (Staff)
- Complaints Policy (staff)
- Counselling Policy
- Explicit Sexual Imagery Policy
- Explicit Sexual Imagery Policy: Operational Procedures for Responding to Sexting (internal School procedure for staff)
- ICT Use Policy
- Recruitment and Selection Policy
- Standard Information Collection Notice (Annexure A)
- Tour Policy



12. Policy Management

The School may, from time to time, review and update this document 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.

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Distribution

Version	Recipient	Date
V2.6	Board of Trustees	13 Mar 2014
V2.6	BGS (MyGrammar)	24 Mar 2014
V2.6	BGS Staff Announcement (Dir of IT)	24 Mar 2014
V3.0	BGS (MyGrammar) Website Staff Announcement	28 Feb 2020



Annexure A - Standard Information Collection Notice

1. Standard Information Collection Notice

- Brisbane Grammar School (School) collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the School.
- 2. The School collects this information via a variety of means, including the documents and forms submitted by you, by written notes or notes of conversations with academic, pastoral or administrative staff.
- We may be required to collect personal information in accordance with legislation including the Education Act QLD 2006, Public Health Act QLD 2005 and Child Protection Act QLD 1999.
- 4. The primary purpose of collecting this information is to enable the School to provide schooling to the student and to enable them to take part in all the activities of the School.
- 5. If we do not obtain the information referred to above we may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.
- 6. On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines and on our website. Photographs of student activities such as sporting events, school camps and school excursions may be taken for publication in School newsletters and magazines and on our website.
- 7. The School from time to time discloses personal and sensitive information to the types of entities listed in our privacy policy, for administrative and educational purposes including to facilitate the transfer of a student to another school. This includes disclosure to other schools, government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, coaches, volunteers and counsellors.
- 8. The School may disclose your personal information to its technology service providers who may be based overseas, and/or store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia. The countries in which those overseas recipients and servers are likely to be located are Singapore, Hong Kong, Canada and the United States of America.
- 9. The School Privacy Policy (available at:

http://www.brisbanegrammar.com/About/Policies) also sets out:

- a) how you may seek access to or correction of personal information collected about you; and
- b) how you may complain about the School's management of your personal information.
- 10. We can be contacted at:

Gregory Tce

Brisbane QLD 4000

P +61 7 3834 5200

reception@brisbanegrammar.com | enrolments@brisbanegrammar.com



2. Employment Application Collection Notice

This section of the standard Collection Notice applies specifically to the collection of personal information relating to the employment process.

- In applying for a position, you will be providing Brisbane Grammar School (the School) with personal information. We can be contacted at:
 Gregory Tce
 Brisbane QLD 4000
 P +61 7 3834 5200 recruitment@brisbanegrammar.com
- 2. The School may also collect your personal information from third parties, for example, from previous employers or nominated referees, and from publicly available sources.
- 3. We may also collect sensitive information from you, for example, medical information and criminal history, if it is relevant to the role you are applying for.
- 4. If you do not provide us with your personal information we will not be able to progress your job application.
- 5. We may keep your information on file for up to 12 months if your application is unsuccessful in case another position becomes available.
- 6. If you submit an un-solicited resume we may keep your information on file for up to 12 months in case a position becomes available.
- 7. The School may disclose your personal information to referees and also to third party suppliers that are used to help with our recruitment processes.
- 8. If you are not a teacher registered with the Queensland College of Teachers, we are required to conduct blue card screening through the Department of Justice and Attorney-General under the Child Protection Act 1999 (Qld).
- 9. The School may disclose your personal information to its technology service providers who may be based overseas, and/or store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia. The countries in which those overseas recipients and servers are likely to be located are Singapore, Hong Kong, Canada and the United States of America.
- The School Privacy Policy (available at: <u>http://www.brisbanegrammar.com/About/Policies</u>) also sets out:
 - a) how you may seek access to or correction of personal information collected about you; and
 - b) how you may complain about the School's management of your personal information.