

## Privacy Policy Statement

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### Exception in Relation to Employee Records:

Under the Privacy Act 1988 (Cth) (Privacy Act), the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to Compass Independent School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Compass Independent School and employee.

### Policy

This Privacy Policy sets out how Compass Independent School manages personal information provided to or collected by it. Compass Independent School is bound by the Australian Privacy Principles contained in the Privacy Act. Compass Independent School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Compass Independent School's operations and practices and to make sure it remains appropriate to the changing school environment.

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

The type of information Compass Independent 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 ('Parents') before, during and after the course of a student's enrolment at the School:
  - name, contact details (including next of kin), date of birth, genders, language background, previous school;
  - parents' education, occupation and language background;
  - records relating to the child's learning, growth and progress
  - details in any Enrolment Application and Support Plan (EASP), Personalised Learning and Support Plan (PLSP) and Individual Curriculum Plan (ICP)
  - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
  - conduct and complaint records, or other behaviour notes, and school reports; information about referrals to government welfare agencies;
  - counselling reports;
  - health fund details and Medicare number;
  - any court orders;
  - volunteering information; and
  - photos and videos at school events.
- job applicants, staff members, volunteers and contractors:
  - name, contact details (including next of kin) and date of birth;

- information on job application;
  - professional development history;
  - salary and payment information, including superannuation details;
  - medical information (e.g. details of disability and/or allergies, and medical certificates);
  - complaint records and investigation reports;
  - leave details;
  - photos and videos at school events;
  - workplace surveillance information;
  - work emails and private emails (when using work email address) and Internet browsing history
- other people who come into contact with the School including name and contact details and any other information necessary for the particular contact with the school.

### **Personal Information you provide:**

Compass Independent 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 Compass Independent 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.

### **How will the School use the personal information you provide?**

Compass Independent School will use personal information it collects from you for the primary purpose of collection, and 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.

### **Students and Parents**

In relation to personal information of students and parents, Compass Independent School's primary purpose of collection is to enable Compass Independent School to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the school. This includes satisfying the needs of parents, the needs of the students and the needs of Compass Independent School throughout the whole period the student is enrolled at the School.



The purposes for which Compass Independent School uses 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 of Compass Independent School
- looking after student's educational, social and medical wellbeing
- seeking donations and marketing for Compass Independent School
- to satisfy Compass Independent School's legal obligations and allow the school to discharge its duty of care.

In some cases where Compass Independent School requests personal information about a student or parent, if the information requested is not provided, Compass Independent 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.

On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet and on our website this may include photographs and videos of student activities such as sporting events, school camps and school excursions. The School will obtain permissions from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet.

### **Job applicants, Staff Members and Contractors**

In relation to personal information of job applicants, staff members and contractors, Compass Independent 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 Compass Independent 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 and marketing for 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 Compass Independent School in its functions or conduct associated activities, such as alumni associations, to enable Compass Independent School and the volunteers to work together.



## Marketing and Fundraising

Compass Independent School treats marketing and seeking donations for the future growth and development of the school as an important part of ensuring that Compass Independent School continues to provide a quality learning environment in which both students and staff thrive. Personal information held by Compass Independent School may be disclosed to organisations that assist in the school's fundraising, for example, the Compass Independent School's Foundation or alumni organisation [or, on occasions, external fundraising organisations].

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes. If you would like to opt-out of direct marketing please contact the School Principal.

## Who might the School disclose Personal Information to and store your information with?

Compass Independent School may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes. This may include to:

- another school or staff at another school
- government departments (including for policy and funding purposes)
- medical practitioners
- people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- people providing administrative and financial services to Compass Independent School
- recipients of School publications, such as newsletters and magazines
- students' parents or guardians
- anyone you authorise Compass Independent School to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.



## **Sending and Storing Information Overseas**

Compass Independent School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Compass Independent School will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Compass Independent School may use online or 'cloud' service providers to store personal information and to provide services to Compass Independent School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. School personnel and the AIS and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use. The data centres where the personal information is likely to be kept are located in the USA, Taiwan, Singapore, Ireland, Netherlands and Belgium.

## **Sensitive Information**

In referring to 'sensitive information', Compass Independent School means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information 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 required by law.



## Management and Security of Personal Information

Compass Independent School's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. Compass Independent School has in place steps to protect the personal information Compass Independent School holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

### Data Breaches

It will be deemed that an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (the affected individuals)
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result
- the information is lost in circumstances where:
  - unauthorised access to, or unauthorised disclosure of, the information is likely to occur
  - assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

### What must the school do in the event of an 'eligible data breach'?

If Compass Independent School suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then Compass Independent School will be required to lodge a statement to the Privacy Commissioner (Commissioner). Where practical to do so, the school entity will also notify the affected individuals. If it is not practicable to notify the affected individuals, Compass Independent School will publish a copy of the statement on its website, or publicise it in another manner.

## Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

## Access and Correction of Personal Information

Under the Privacy Act, an individual has the right to seek and obtain access to any personal information which Compass Independent School holds about them and to advise Compass Independent School of any perceived inaccuracy. There are some exceptions to this right set out in the Act.

To make a request to access or to update any personal information Compass Independent School holds about you or your child, please contact the School Principal in writing. Compass Independent School may require you to verify your identity and specify what information you require. Compass Independent 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, Compass Independent School will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

The School will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

## Consent and Rights of Access to the Personal Information of Students

Compass Independent School respects every parent's right to make decisions concerning their child's education. Generally, Compass Independent School will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. Compass Independent 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.

As mentioned above, parents may seek access to personal information held by Compass Independent School about them or their child by contacting the School 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 Compass Independent School's duty of care to a student.



The School may, at its discretion, on the request of a student grant that student access to information held by Compass Independent 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 warrant it.

### **Enquiries and Complaints**

If you would like further information about the way Compass Independent School manages the personal information it holds, or wish to make a complaint about Compass Independent School's breach of the Australian Privacy Principles please contact the School Principal. Compass Independent School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.



## APPENDIX 1

### Standard Collection Notice

1. The 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. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the School to provide schooling to students enrolled at the school, exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles (APPs) under the Privacy Act 1988. We may ask you to provide medical reports about students from time to time.
5. The School may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
  - other schools and teachers at those schools;
  - government departments (including for policy and funding purposes);
  - medical practitioners;
  - people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
  - providers of learning and assessment tools;
  - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
  - people providing administrative and financial services to the School;
  - anyone you authorise the School to disclose information to; and
  - anyone to whom the School is required or authorised by law, including child protection laws, to disclose the information.
6. Personal information collected from students is regularly disclosed to their parents or guardians.
7. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be

situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.

8. The School's Privacy Policy, accessible on the School's website, sets out how parents or students may seek access to and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to a student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
9. The School's Privacy Policy also sets out how parents and students can make a complaint about a breach of the APPs and how the complaint will be handled.
10. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. [It may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose.] We will not disclose your personal information to third parties for their own marketing purposes without your consent.
11. On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet [and on our website] this may include photographs and videos of student activities such as sporting events, school camps and school excursions. The School will obtain permissions from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet.
12. We may include students' and students' parents' contact details in a class list and School directory.
13. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why.

## APPENDIX 2

### Employment Collection Notice

1. In applying for this position, you will be providing Compass Independent School with personal information. We can be contacted at 8 Musk Avenue, Kelvin Grove and via contact details on our website.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted to. We usually disclose this kind of information to the following types of organisations e.g. support vendors that provide services around administration systems.
5. We are required to [conduct a criminal record check] collect information [regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences] under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

## APPENDIX 3

### Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the School, you will be providing Compass Independent School with personal information. We can be contacted at 8 Musk Avenue, Kelvin Grove and via contact details on our website.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for at least 2 years.
4. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
5. We will not disclose this information to a third party without your consent unless otherwise permitted to. We usually disclose this kind of information to the following types of organisations e.g. support vendors that provide services around administration systems.
6. We are required to [conduct a criminal record check] collect information [regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences] under Child Protection law. We may also collect other personal information about you in accordance with these laws.
7. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

Purpose:	Compass Independent School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the School and describes how the School uses and manages personal information provided to or collected by it.	
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors and people visiting the School site; and describes the type of information the School collects, how the information is handled, how and to whom the information is disclosed and how the information may be accessed.	
Status:	Approved	Supersedes: Nil
Authorised by:	Chair	Updated: 19/01/2024
References:	<ul style="list-style-type: none"> <li>• <i>Education (Accreditation of Non-State Schools) Regulations 2017</i></li> <li>• <i>Work Health and Safety Act 2011 (Qld)</i></li> <li>• <i>Privacy Act 1988 (Cth)</i></li> <li>• <i>Disability Discrimination Act 1992 (Cth)</i></li> <li>• <i>Australian Privacy Principles</i></li> <li>• Compass Independent School Privacy Policy</li> <li>• Compass Independent School Child Protection Policy</li> <li>• Compass Independent School Complaints</li> </ul>	
Review Date:	Review annually	Next review date: 19/01/26
Policy Owner:	Compass Independent School	