

PRIVACY POLICY

Privacy Policy

This Privacy Policy details how we, at All Saints' College, (incl TSS and LS) protect your privacy and how we comply with the relevant legislative requirements. All Saints' College is bound by the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles (APPs)*. As the College is located in Western Australia, it is not subject to additional State-based health privacy legislation applicable in other jurisdictions such as NSW, VIC, or ACT.

This policy also describes:

- who we collect information from.
- the types of personal information collected and held by us.
- how this information is collected and held.
- the purposes for which your personal information is collected, held, used and disclosed.
- how you can gain access to your personal information and seek its correction; and
- 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.

Who we Collect Personal Information From

At All Saints' College we collect personal information from students, parents, prospective parents, job applicants, staff, volunteers, and others including alumni, contractors, visitors, and others that come into contact with the College.

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

What Kinds of Personal Information Do We Collect?

The kinds of personal information we collect is largely dependent upon whose information we are collecting and why we are collecting it, however in general terms the College may collect:

- **Personal Information** including names, addresses and other contact details; dates of birth; next of kin details; socio-educational background; financial information, photographic and video images, and attendance records.
- **Sensitive Information** (particularly in relation to student and parent records) including religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, membership of professional, trade or occupational associations, family court orders and criminal records.
- Health Information (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition, and dietary requirements.
- Conduct and complaint records such as behavioural notes, disciplinary actions, and grievance documentation.
- Workplace surveillance data including CCTV footage and digital activity logs such as email usage, internet browsing history, where applicable.
- Referral information from external agencies such as medical professionals and welfare organisations.



- Family Court orders and legal documentation relevant to student welfare and custody arrangements.

How do we collect your personal information?

How we collect personal information will largely depend upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

Where possible the College has attempted to standardise the collection of personal information by using specifically designed forms (e.g., an Enrolment Form or a Medical Information Form). However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face-to-face meetings, and through financial transactions

We may collect personal information from other people (e.g., a personal reference) or independent sources (e.g., a telephone directory), however, we will only do so where it is not reasonable and practical to collect the information from you directly.

We may also collect personal information through surveillance activities such as CCTV monitoring on campus and digital monitoring of College-issued devices and accounts (eg email and internet usage), where applicable and in accordance with College policies.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as "unsolicited information". Where we collect unsolicited information, we will only hold, use and/or disclose that information if we could otherwise do so had we collected it 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 information as appropriate.

How we use personal information

We only use 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 to which you have consented.

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

- providing education, pastoral care, cocurricular, extracurricular and health services.
- satisfying our legal obligations including our duty of care and child protection obligations.
- keeping parents informed as to college community matters through correspondence, newsletters, magazines, our website, and College Portal.
- marketing, promotional, and fundraising activities.
- supporting the activities of college associations such as the Old Saints', P&F and All Saints' College Foundation.
- supporting community-based causes and activities, charities and other causes in connection with the College's functions or activities.
- helping us to improve our day-to-day operations including training our staff; systems development; developing new programs and services; undertaking planning, research, and statistical analysis.
- college administration including for insurance purposes.
- the employment of staff.
- the engagement of volunteers.

We only collect sensitive information reasonably necessary for one or more of these functions or



activities, if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety another permitted general situation (such as locating a missing person) or permitted health situation (such as the collection of health information to provide a health service) exists.

If we do not have the relevant consent and a permitted health situation or permitted general situation does not exist, then we may still collect sensitive information provided it relates solely to individuals who have regular contact with the College in connection with our activities. These individuals may include students, parents, volunteers, former students, and other individuals with whom the College has regular contact in relation to our activities.

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 of Personal Information

We store personal information in a variety of formats including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is of importance to us, and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on the college databases on a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in a secure manner in lockable rooms. Access to these records is restricted to staff on a need-to-know basis.
- Implementing physical security measures around the college buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies, and procedures, designed to protect personal information storage on our computer networks.
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality, and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- 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 or a similar privacy regime.

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

Our website may contain links to other websites. Unless otherwise stated, we do not share your personal information with those websites, and we are not responsible for their privacy practices. Please check their privacy policies.



Who might the College disclose personal information to?

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

- Another school.
- Government departments and other statutory bodies.
- Educational and assessment agencies, authorities, and councils.
- Medical practitioners.
- People providing services to the College, including specialist visiting teachers and sports coaches.
- distributors of College publications, like newsletters and magazines.
- Parents.
- Anyone you authorise the College to disclose information to.
- Anyone to whom the School is required or authorised to disclose the information to by law, including child protection laws.
- Providers of digital platforms and cloud-based services used by the College, such as Microsoft 365 or Google Workspace for Education, for the purpose of communication, learning management, and data storage.
- External consultants and service providers who support the College in areas such as human resources, IT infrastructure, and student wellbeing.

Disclosure would only occur 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 life, 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.

At All Saints' College we take a commonsense 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 (especially when dealing with older students and especially when dealing with sensitive information), 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.

We aim to be open and transparent in our communication with parents relating to their

child/children, however, there may also be occasions where parents/carers are not provided access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, breach the College legal obligations or result in a breach of the College's duty of care to the student.

Disclosure of personal information to overseas recipients

All Saints' College may disclose personal information about an individual to overseas recipients in specific circumstances. These may include:

- Organising overseas excursions or student exchange programs.
- Communicating with international educational institutions or service providers.
- Storing personal information using cloud-based services where data may be hosted on servers located outside Australia.

For example, the College uses platforms such as **Microsoft 365** and **Google Workspace for Education** to support communication, learning, and administration. These platforms may store limited personal information on servers located overseas.

In such cases, the College takes **reasonable steps** to ensure that any overseas recipient complies with the **Australian Privacy Principles (APPs)** or is subject to a **comparable privacy regime**. These steps may include contractual arrangements, privacy impact assessments, and verification of the provider's compliance credentials.

We will not disclose personal information to an overseas recipient unless:

- We have obtained the individual's consent (which may be implied).
- We are satisfied that the overseas recipient is subject to a law or binding scheme substantially similar to the APPs.
- The disclosure is necessary to prevent or lessen a serious threat to the life, health, or safety of an individual or to public safety.
- The disclosure is required or authorised by law.
- The disclosure is reasonably necessary for a law enforcement-related activity.

Third-Party Service Providers

The College undertakes reasonable due diligence when engaging third-party service providers who may have access to personal information. This includes ensuring, as far as practicable, that such providers comply with the Australian Privacy Principles or an equivalent privacy framework.

Fundraising and Marketing

The College may use personal information to seek donations or support for fundraising initiatives that contribute to the development of the College. This may include communications from the College Foundation, alumni associations or external fundraising partners. If you do not wish to receive such communications, you may opt out by contacting the Director of Personnel and Policy.

How we ensure the quality of your personal information

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

Updating personal information

The National Privacy Principles require the College not to store personal information longer than necessary. You have the right to check what personal information the College holds about you. Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act.

Students will generally have access to their personal information through their Parents, but older students may seek access themselves. To make a request to access any information the College holds about you or your child, please contact the Director of Personnel and Policy in writing.

The College may require you to verify your identity and specify what information you require.

How to gain access to your personal information we hold

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 the

reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested 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, facsimile or by personal delivery to any one of our contact details as noted below. You may also make a verbal complaint.

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:

- Emailing personnel.policy@allsaints.wa.edu.au
- Calling (08) 9313 9333
- Writing to our Director of Personnel and Policy at Ewing Avenue Bull Creek, WA, 6149

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 Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website for any changes.

Authorised By:	This policy was approved by the Leadership Team on 12 January 2023
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Policy Custodian: (Contact for queries about this policy)	Director of Personnel and Policy