



# KOROWA

## Korowa Privacy Policy

### Applicability

This policy applies to all activities of Korowa Anglican Girls' School ("the School") and its related bodies corporate and all dealings of our staff and contractors with students, parents, and guardians. It applies to the period before, during and after a student's enrolment and/or a staff member's employment at the School. This policy supersedes any previous Privacy Policy.

This Privacy Policy sets out how the School manages personal information provided to or collected by it and your rights in relation your personal information, including how to complain and how we deal with complaints. The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 (Privacy Act). In relation to health records, the School is also bound by the Health Privacy Principles which are contained in the Health Records Act 2001 (Vic) (Health Records Act).

Under the Privacy Act the, Australian Privacy Principles do not apply to certain treatments of an employee record. As a result, this Privacy Policy does not apply to the School's treatment of an employee record held by the School, where the treatment is directly related to a current or former employment relationship between the School and the employee. The School handles staff health records in accordance with the "Health" Privacy Principles in the Health Records Act.

The 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. Any changes to the policy will be published on the School's website at [www.korowa.vic.edu.au](http://www.korowa.vic.edu.au)

### Kinds of personal information we collect

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

1. **Students and parents and/or guardians** ("Parents"), before, during and after the course of a student's enrolment at the School), including:
  - name, contact details (including next of kin), date of birth, gender, language background, previous school, and religion
  - parents' education, occupation and language spoken at home, nationality and country of birth
  - health information (e.g. details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports, and names of doctors)
  - results of assignments, tests, and examinations
  - 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 Family Court orders
  - criminal records
  - volunteering information
  - photos and videos at School events
  - information collected through online tools: such as apps and other software used by our school including via the use of an AI system.
2. **Job applicants, staff members, volunteers, and contractors**, including:
- name, contact details (including next of kin), date of birth, and religion
  - information on job application
  - professional development history
  - salary and payment information, including superannuation details
  - health 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
  - Working With Children Checks
  - VIT registration details
  - information collected through online tools: such as apps and other software used by our school including via the use of an AI system.
3. 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.

## How we collect personal information

### Personal Information you provide

The School generally collects personal information about an individual directly from the individual (or their Parent in the case of students). This includes by way of forms, face-to-face meetings and interviews, emails, and telephone calls.

### 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, a reference from another school or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

### **Personal information generated by artificial intelligence (AI) systems:**

We may also generate personal information by using AI systems. Information generated in this way is treated as Personal Information we have collected about you. The kinds of personal information that may be generated by AI systems include those set out above under the heading “Kinds of personal information we collect”

### **Personal Information from other sources**

We may also collect personal information through surveillance activities (such as CCTV security cameras) and student e-mail monitoring.

### **Purposes for which we collect, use, and disclose personal information**

The purposes for which the School collects, uses and discloses personal information depends on our relationship with you and includes the following:

#### **Students and Parents**

- providing schooling and school activities
- satisfying the needs of Parents, the needs of the student and the needs of the School throughout the whole period a student is enrolled at the School
- making required reports to government authorities
- keeping Parents informed about matters related to their child's schooling, through correspondence, apps, newsletters, and magazines
- day-to-day administration of the School
- looking after students' educational, social, health and wellbeing
- seeking donations for the School (see the “Fundraising” section of this Privacy Policy)
- 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 and contractors:**

- assessing and (if successful) engaging the applicant or contractor
- administering the individual's employment or contract
- seeking donations for the School (see the “Fundraising” section of this Privacy Policy)
- for insurance purposes
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

#### **Volunteers:**

- to contact you about, and administer the volunteer position
- for insurance purposes
- satisfying the School's legal obligations, for example, in relation to child protection legislation

The School does not make significant decisions affecting individuals solely through automated or AI-driven processes. Any AI systems used are subject to human review before decisions affecting a student or staff member are made.

## Whom we disclose personal information to

The School may disclose personal information, including sensitive information, for educational, care and administrative purposes and to seek support and advice. This may include to:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student
- 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
- organisations that assist us with fundraising (see the “Fundraising” section of this Privacy Policy)
- providers of specialist advisory services and assistance to the School, including in the area of Human resources, child protection, students with additional needs and for the purposes of administering Microsoft Apps for Education and ensuring its proper use (see further section below (“Sending and storing information overseas”))
- providers of learning and assessment tools
- for the purpose of registering students on various educational web tools and online learning 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);
- agencies and organisations to whom we are required to disclose personal information for education, funding, and research purposes
- people providing administrative and financial services to the School
- the provider of our information management and storage system and other information technology services
- recipients of School publications, such as newsletters and magazines
- students' parents or guardians
- for use in class lists (unless you advise us otherwise)
- anyone you authorise the School to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.
- third party providers of any AI systems we may use
- All AI service providers must undergo vendor assessment, including privacy, bias, and data sovereignty evaluation, before being authorised for School use. AI systems must have clear data-retention and deletion policies.

## How we store personal information

We store your personal information in hard copy and electronically. We use information management and storage systems provided by third party service providers. Personal information is stored with and accessible by the third-party service providers for the purpose of providing services to the School in connection with the systems. 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. See further the section below ‘Sending and storing information overseas.’

## **Sending and storing information overseas**

The School may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate an overseas trip/tour for students.

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 and provide technical support. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia. An example of such a cloud service provider is Microsoft 365 for Education. Microsoft 365 provides, stores and processes limited personal information for the purpose of delivering the tools. School personnel and its service providers may have the ability to access, monitor, use or disclose communications (e.g., instant messaging), documents and associated administrative data for the purposes of administering Microsoft 365 and ensuring its proper use.

Should the School use AI systems that are provided by third parties, these third parties may store or have access to personal information input into, and/or generated by, these AI systems. These third parties may be located outside Australia.

## **Cybersecurity and Incident Response**

If a data breach occurs that is likely to result in serious harm to individuals, the School will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) in accordance with the Notifiable Data Breach Scheme. Refer to the Schools' Privacy Breach Response Procedure

## **Fundraising**

The School treats 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. Your personal information may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities, for example, the School's Foundation or alumni organisation and, on occasions, external fundraising organisations. If you do not want to receive fundraising communications from us, please contact our Alumni Manager.

## **Security of personal information**

The School has in place steps to protect the personal information the 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.

These steps include:

- Restricting access to information on the School 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 personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need-to-know basis.
- Implementing physical security measures around the School 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 resource 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.

The School has in place procedures to manage our response to any actual or suspected misuse, interference, loss or unauthorised access, modification, or disclosure of personal information (Privacy Breach). These procedures enable the School to contain, assess and respond to a Privacy Breach.

### **Access and correction of personal information**

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to seek access to and/or correction of any personal information that the School holds about them. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves. There are some exceptions to these rights set out in the applicable legislation.

To make a request to access, update or correct any personal information the School holds about you or your child, please contact the School Principal by email ([principal@korowa.vic.edu.au](mailto:principal@korowa.vic.edu.au)) post, or telephone at 8808 8888. The School may require you to verify your identity and specify what information you require. The School may charge a reasonable fee for giving access to your personal information (but will not charge for the making of the request or to correct your personal information), If the information sought is extensive, the School will advise the likely cost in advance.

If we decide to refuse your request, we will provide you with written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.

### **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. Generally, 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 School Principal or by telephone or in writing (details in the section above 'Access and correction of personal information'). However, there may be occasions when access is denied. Such occasions may include (but are not limited to) where the School believes the student has capacity to consent and the School is not permitted to disclose the information to the Parent without

the student's consent, 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 only be done when the maturity of the student and/or the student's personal circumstances warrant it.

### **Destruction of Information**

Personal Information collected in accordance with this policy will be destroyed and/or de-identified when that information is no longer required, taking into account any legislative obligations to retain information for any specified periods.

### **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 School Principal by email ([principal@korowa.vic.edu.au](mailto:principal@korowa.vic.edu.au)), post or telephone at 8808 8888.

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

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, [www.oaic.gov.au](http://www.oaic.gov.au)

### **Accountability**

All School employees are required to respect the confidentiality and protection of personal information relating to students, prospective students, parents or guardians, staff members, staff applicants, visitors, volunteers, alumni, and contractors.

### **Related policies**

- Privacy Breach Response Procedure
- Korowa Complaints Program
- Staff ICT and Artificial Intelligence (AI) Policy

### **Policy Owner**

This Policy is owned by the Principal and approved by the School Council

### **Review Date**

This Policy will be reviewed every two years with the next review due in March 2027 or following any significant breaches or changes in legislation.