THE KING DAVID SCHOOL

PRIVACY POLICY

POLICY TITLE: PRIVACY POLICY

DEVELOPED/REVIEWED BY

Chief Finance and Operations Officer
Human Resources Manager
Senior Leadership Team

REVIEW SUMMARY

Policy updated in October 2026 to align with the Australian Privacy Principles (APPs), the Privacy and Other Legislation Amendment (POLA) Act 2024 (Cth), the Health Records Act 2001 (Vic.), the Australian Education Regulations 2023 (Cth), Ministerial Order No. 1359 (Child Safe Standards), Victorian Information Sharing Schemes (CISS & FVISS), and VRQA requirements.

DOCUMENT DEVELOPMENT PROCESS

This document was first developed by the Chief Operating Officer in April 2023. Reviewed in June 2024 and fully revised in August 2026 by the Chief Operating Officer and Human Resources Manager.

RATIONALE

Under the Australian Privacy Principles, the Privacy Policy is required to inform individuals about how personal information provided to or collected by The King David School, is used and managed. It serves as a guide to the school staff, students, parents, volunteers and contractors of the standards to be observed when handling personal information in order to ensure consistency in the school's approach to privacy.

DEFINITIONS

Australian Privacy Principles	Principles enshrined in Schedule 1 of the Privacy Act 1988 (Cth.) (as amended) that set out minimum standards, rights, and obligations in relation to how organisations deal with the collection, use, disclosure, handling, storage, access, and correction of personal information.
personal information	Information or an opinion (whether true or not and whether recorded in a material form or not) about an identified individual or an individual who is reasonably identifiable. Examples include name, address, telephone number, date of birth, commentary, or opinion about a person.
health information	Any information or opinion about the health or disability of an individual, an individual's expressed wishes about the future provision of health services to him or her, or a health service provided, or to be provided to an individual. Examples include health records, certificates, details of medical background, health assessment results and appointment details.
sensitive information	Information related to an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a trade union, political association or professional or trade association, sexual preferences or practices, or criminal record; health information and biometric information about an individual.

data breach	A data breach occurs when personal information (including health and sensitive information) held by an organisation is lost or subjected to unauthorised access or disclosure.

PRINCIPLES/GUIDING PRINCIPLES

This Privacy Policy sets out how The King David School manages personal information provided to or collected by it.

The School is bound by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth.). In relation to health records, the School is also bound by the Health Records Act 2001 (Vic.) and the Health Privacy Principles in that Act. The School also complies with relevant obligations under the Australian Education Act 2013 (Cth), the Australian Education Regulations 2023 (Cth), the Child Wellbeing and Safety Act 2005 (Vic.), Ministerial Order No. 1359 – Implementing the Child Safe Standards, the Family Violence Protection Act 2008 (Vic.), and the Surveillance Act 1999 (Vic.).

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.

PROCEDURES

What kinds of personal information does The King David School collect and hold?

The School collects and holds personal information, including health and other sensitive information, about:

Students 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, nationality, languages spoken, previous school details, and religion
- Birth certificates, immunisation records, residency, visa status/citizenship, and relevant passport or visa grant details
- Medical and welfare information (e.g. details of disability, allergies, medical reports, cognitive assessments, dietary information, names of doctors, and details of assistance received.
- Conduct and complaint records, behaviour notes, school attendance, academic reports, work assessment pieces and artwork
- Information about referrals to government welfare agencies
- Information obtained during counselling
- Any court orders (including parenting plans and intervention orders)
- Photos, videos and CCTV footage captured on both School premises and the streets adjacent to the School or at School events.
- Face biometric identifiers (encrypted) for the sole purpose of automated member (student, staff) photo consent application in the School's media gallery

Parents/guardians/carers of students including:

- Name, address, and contact details
- Education, occupation, language background and nationality
- Court orders (such as intervention/restraining orders) and parenting plans
- Financial information (particularly where requesting fee concessions or alternative fee arrangements due to financial hardship)
- Volunteer information (including Working with Children Check)

Job applicants, staff members, volunteers, and contractors, including:

- Name, contact details (including next of kin), date of birth and religion
- Information on job applications, resumes, qualifications, professional development history, training records and competency assessments
- Information provided by a former employer or a referee
- Salary, payment and superannuation details
- Medical information (e.g. details of disability, allergies and medical certificates)
- Complaint records, investigation reports and workplace surveillance records
- Work emails and private emails (when using work email address) and internet browsing history

Website users:

- Information collected via website tracking technologies (such as 'cookies'), including IP addresses, pages viewed, device identifiers, browser types and referral URLs.

Exception in relation to employee records

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record where the handling is directly related to a current or former employment relationship between The King David School and the employee. However, the School handles staff health records in accordance with the Health Privacy Principles in the Health Records Act 2001 (Vic.). Staff members with questions regarding the handling of their employee records may contact the Privacy Officer.

How will The King David School collect and hold personal and sensitive information?

Personal and sensitive information provided directly

The King David School will generally collect personal information held about an individual by way of electronic or paper forms filled out by parents/guardians/carers or students, face-to-face meetings and interviews, emails, telephone calls, online portals/apps, surveys, polls, and event registration forms.

Personal and sensitive information provided by other people

In some circumstances, the School may be provided with personal information about an individual from a third party, such as a report provided by a medical professional or a reference from another school. Information collected from another school may include academic records and information to assist in making reasonable adjustments.

Anonymity and Pseudonymity

Individuals have the right to deal with the School on an anonymous or pseudonymous basis where practicable (e.g., when making a general inquiry or providing anonymous feedback). However, to deliver schooling, provide educational and support services, process job applications, or fulfill legal obligations, the School must generally identify the individuals with whom it interacts. Failure to provide requested personal information may prevent the School from enrolling a student, permitting participation in specific activities, or engaging a worker.

Holding Personal and Sensitive Information and Safeguards

The School takes security seriously and implements technical and physical safeguards to protect personal information against misuse, interference, loss, unauthorized access, modification, or disclosure. These measures include locked paper storage cabinets, password protection, role-based access permissions, multi-factor authentication (MFA), and encrypted data transfers.

Collection of Personal Information Through CCTV

The School installs, uses, and maintains CCTV cameras around and adjacent to campus in accordance with the Surveillance Act 1999 (Vic.). CCTV footage is collected and used as necessary to ensure the

care, safety, and welfare of staff, students, and visitors, and to protect the School's legal interests. CCTV footage is disclosed only as authorised or required by law.

Collection of Sensitive Information Through Facial Recognition Software (pixevity)

The School uses facial recognition software via pixevety to process encrypted face biometric templates of students and staff. This automated system verifies media consent permissions before photos or videos are published or shared in the School's digital gallery. Biometric templates are securely encrypted, stored, and accessible only to authorised personnel for media consent management.

How will The King David School use the personal information you provide?

The King David School will use personal information it collects from parents/guardians/carers for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected or consented to, or as otherwise required or permitted by law.

Students and Parents/Guardians/Carers

Primary purposes include enabling the School to provide schooling, exercising duty of care, administering the School, and supporting educational, social, emotional, and medical wellbeing. Purposes include keeping parents informed via newsletters and portals, day-to-day administration, improving day-to-day operations and security in school media management for greater control, transparency, and safeguarding of school media, and satisfying legal obligations.

In some cases where the School requests personal information about a student or parent/guardian/carer, 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

In relation to the personal information of job applicants and contractors, the School's primary purpose of collection is to assess and (if successful) engage the applicant, or contractor, as the case may be.

The purposes for which the School uses the personal information of job applicants and contractors include:

- Administering the individual's employment or contract, as the case may be
- For insurance purposes
- Seeking donations and marketing for the School
- Satisfying the School legal obligations, for example, in relation to child protection

Volunteers

The School obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as Parents Association and Parent Security Group.

The purposes for which The King David School uses the personal information of volunteers includes:

- Enabling the School to manage the engagement process of volunteers
- For insurance purposes
- Satisfying the School legal obligations, for example, in relation to child protection
- To confirm their suitability and to manage their visits

Direct Marketing and Fundraising

The King David 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 fundraising, for example, Parents' Association, or on occasion, external fundraising organisations.

Parents/guardians/carers, 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 and sometimes people's images, may be used for marketing purposes.

Every direct marketing or fundraising communication sent by the School includes a simple, clear, and accessible opt-out mechanism (e.g., an 'unsubscribe' link) allowing individuals to opt out of receiving future marketing communications. Individuals may also opt out at any time by contacting the Privacy Officer.

Artificial Intelligence (AI) and Automated Decision Making

The School may use technology platforms that incorporate AI to support learning and administration. Personal information is not uploaded to publicly available AI platforms. Where automated processes assist administrative operations, human oversight and final decision-making are maintained.

Who might The King David School disclose personal information to?

The King David School may disclose personal information (including sensitive information) held about an individual for educational, administrative, and support purposes. This includes disclosures to:

- School service providers offering educational, support, medical, and health services.
- Contracted service providers such as pixevety, who assist the School in safeguarding its school media through the provision of a digital media and photo consent administration service.
- Third-party software providers (including cloud hosters, document management systems, and assessment tools).
- Government authorities under the Australian Education Act 2013 (Cth) and Australian Education Regulations 2023 (Cth) (including NCCD quality assurance processes).
- Assessment and curriculum authorities (e.g., VCAA, ACARA, and NAPLAN test managers).
- Prescribed Information Sharing Entities under Victorian Child Information Sharing and Family Violence frameworks.
- Anyone authorised by the individual or as compelled/required by law.

Information Sharing Schemes (Victoria)

The School is a prescribed entity under the Child Information Sharing Scheme (CISS) (Part 6A, Child Wellbeing and Safety Act 2005 (Vic.)) and the Family Violence Information Sharing Scheme (FVISS) (Part 5A, Family Violence Protection Act 2008 (Vic.)). The School discloses confidential information to other prescribed entities when permitted or required under these frameworks to promote child wellbeing, manage safety risks, or assess family violence risk.

Cross-Border Disclosures and Cloud Storage

The School uses cloud-based platforms to store data and facilitate operational systems. Some cloud servers or platform infrastructure may reside outside Australia. The School ensures that overseas service providers adhere to data protection standards substantially similar to the Australian Privacy Principals.

Student Images and Media Protocols

Photographs and videos of students are collected to document educational activities, celebrate achievements, and manage school media. Consent is obtained during enrolment and periodically updated, standing until modified or formally revoked in writing. No student image linked with the student's full name will be published in external marketing or promotional materials (including public website or

social media channels) without express prior written consent. At large school events, incidental inclusion of students in group recordings may occur.

Additional Data Protection and Prohibition on Uploading Personal Student Data

At The King David School, all staff are strictly prohibited from uploading any personal student data, including names, photographs, videos, or other identifying information, to external websites, applications, or third-party platforms without express written consent from the parent or guardian which is granted yearly via the annual student update. This includes, but is not limited to, using online editing platforms, social media, and cloud-based services that have not been approved by the school.

Data Transfer and Encryption

All personal student data transferred electronically must be encrypted and shared only through school-approved systems. Staff are required to ensure that any communication or transfer of personal student information complies with data protection standards, and that no unauthorised persons gain access to this information.

Monitoring and Auditing

The King David School reserves the right to audit and monitor staff compliance with data protection regulations, especially regarding the use of cloud storage and digital tools. All staff members are required to adhere strictly to the school's privacy and data security standards.

The steps The King David School will take to protect your personal information

How does The King David School treat sensitive information?

In referring to sensitive information, the 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 the parent/guardian/carer agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The King David School staff are required to respect the confidentiality of students' and parents/guardians/carers' personal information and the privacy of individuals.

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. This includes responding to any incidents which may affect the security of the personal information it holds. If the School assesses that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, we will notify them and the Office of the Australian Information Commissioner of the breach.

Access and correction of personal information

Under the Privacy Act 1988 (Cth.) and the Health Records Act 2001 (Vic.), an individual has the right to seek and obtain access to any personal information and health records respectively which The King David School holds about them and to advise the School of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents/guardians/carers, but older students may seek access and correction themselves.

There are some exceptions to the access rights set out in the applicable legislation.

To make a request to access or to update any personal information the School holds about parents/guardians/carer or children, please contact the Principal in writing. The School may require verification of identity and specification of what information is required. The School may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing, and copying any material requested. If the information sought is extensive, the School will advise the likely cost in advance. If the School cannot provide access to that information, we will provide written notice explaining the reasons for refusal.

There may be circumstances where the reason for refusal is not provided, if doing so may breach the privacy of another person.

Consent and rights of access to the personal information of students

The King David School respects every parent/guardian/carer's right to make decisions concerning their child's personal information.

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/guardians/carers. The King David School will treat consent given by parents/guardians/carers as consent given on behalf of the student, and notice to parents/guardians/carers will act as notice given to the student.

Parents/guardians/carers may seek access to personal information held by The King David School about them or their child by contacting the Principal. However, there may 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 duty of care to the student.

The King David 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/guardians/carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Complaints

If parents/guardians/carers wish to complain that the School has interfered with their privacy because of an alleged breach of the Australian Privacy Principles, they should contact the Principal in writing.

The King David School will investigate the complaint and will notify the parent/guardian/carer of the making of a decision in relation to the complaint as soon as is practicable after it has been made.

If the parents/guardians/carers are not satisfied with the School decision, they may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are:

Office of the Australian Information Commissioner (OAIC)

GPO Box 5218, Sydney, NSW 2001
Telephone: 1300 363 992

Email: foi@oaic.gov.au

An online privacy complaint form is available from www.oaic.gov.au.

Contact Information

To make an access/correction request, opt out of direct marketing, or submit a privacy inquiry or complaint, please contact:

Privacy Officer / Chief Finance and Operations Officer
The King David School
Phone: 9291 7900
Postal Address: 520 Orrong Road, Armadale, VIC 3143

RESPONSIBILITY

- Principal
- Chief Finance and Operations Officer
- Human Resources Manager

RELATED LEGISLATION

- Privacy Act 1988 (Cth.) & Privacy and Other Legislation Amendment Act 2024 (Cth.)
- Health Records Act 2001 (Vic.)
- Australian Education Act 2013 (Cth.) & Australian Education Regulations 2023 (Cth.)
- Child Wellbeing and Safety Act 2005 (Vic.) & Ministerial Order No. 1359
- Family Violence Protection Act 2008 (Vic.)
- Surveillance Act 1999 (Vic.)
- Privacy and Data Protection Act 2014 (Vic.)

RELATED POLICIES

- Enrolment Policy
- Reportable Conduct
- Mandatory Reporting
- Student Wellbeing Policy

RELATED DOCUMENTS

- Public Record Office Victoria Recordkeeping Standards

NEXT REVIEW

October 2028