

## POLICY

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**NAME:** Privacy Policy  
October 2021

**UPDATE DUE:** October 2023, or more often as circumstances require

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### Commitment to Child Safety

All students who attend Camberwell Girls Grammar School (CGGS) have a right to feel and to be safe. The wellbeing and safety of all students in our care is our first priority and we have zero tolerance to child abuse. The protection of students is the responsibility of everyone who is employed at, or is engaged by CGGS in child-connected work. To ensure the safety and best interests of all students, we take into account the needs of those with an Aboriginal or Torres Strait Islander heritage, those from culturally and/or linguistically diverse backgrounds and those with a disability.

### Purpose

Protecting your privacy and personal information is important to us. The purpose of this policy is to outline how Camberwell Girls Grammar School (CGGS) collects, handles, uses, discloses and manages your personal information. In this policy, 'we' refers to CGGS and 'you' refers to the individual about whom we collect the personal information.

We are committed to protecting your privacy, in accordance with applicable Australian privacy laws and will ensure this Policy remains appropriate to any change in the School's practices and operating environment.

Camberwell Girls' Grammar School (CGGS) is bound by the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988 (Cth.)* (**Privacy Act**) designed to protect the privacy of individuals by regulating the way **personal** information is handled, managed and used at the School.

We are also required to comply with the Health Privacy Principles (**HPPs**) contained in the *Health Records Act 2001 (Vic)* (**Health Records Act**) designed to protect the privacy of individuals by regulating the way **health** information is handled, managed and used at the School.

### What is Personal Information?

Information that identifies an individual or allows an individual to be identified

**Sensitive Information:** A subset of personal information. Information about an individual's racial or ethnic origin, political opinions, professional or political or religious affiliations or memberships, sexual orientation or practices, criminal record, health, genetics and/or biometrics.

**Health Information:** A subset of sensitive information. Information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided, currently or in the future, to an individual that is also personal information.

**Employee Records:** We are generally exempt from the Privacy Act when we collect and handle employee records. So this policy does not apply to employee records. This Policy however applies to the protection of employee health information under the State privacy legislation.

## Why personal information is collected by CGGS

The main reasons we collect, hold, use or disclose personal information is for functions related directly to the School:

- to enable appropriate schooling and care for our students
- to keep parents and guardians informed about their child's progress and wellbeing
- to provide suitable administration for the School
- to promote the School and seek support through philanthropic donations integral to the growth of the School or specific School initiatives through direct marketing, campaigns (including online), promotion of events and school publications, such as newsletters and magazines
- to perform research and statistical analysis
- to protect the security of our offices and the property held on our premises
- to protect the health and wellbeing of our staff, students and visitors
- to recruit staff and contractors, and
- to enable the School and the volunteers to work together.

We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection:

- for which you have provided your consent; and
- which are required or authorised by or under law (including, without limitation, privacy and Public Health and Wellbeing legislation); This may include responding to requests for information under the Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS). Under the Scheme, consent will not be required to keep a child safe and for CGGS to respond to a request to share confidential information about a vulnerable child or a child at risk, including health information, to be shared.

**Opting out:** Where you have consented to receiving marketing communications from us, your consent will remain unless you advise us otherwise. You can opt out at any time, by:

- contacting us (either via the contact details provided on the communication received, or via the details at the end of this Policy)
- using the unsubscribe facility that we include in our commercial electronic messages (such as newsletter emails and SMS) to opt out of receiving those messages.

## What Information is Collected by CGGS?

What personal information is collected depends on the circumstances, and your capacity as a student, parent, staff member, contractor, consultant, volunteer, customer, supplier, job applicant, alumni, visitor or anyone else that comes into contact with the School.

Personal information may include, but is not limited to:

- Full name, address, contact details (telephone numbers and email addresses)
- Date of birth and gender
- Academic results / records
- Bank account details
- Visa status, Residency status
- Emergency contact details, next of kin details
- Occupation, Marital status
- Qualifications

Sensitive information may include, but is not limited to:

- Government identifiers such as TFN
- Nationality
- Country of birth
- Professional memberships
- Family court orders
- Criminal record
- Religious beliefs

Health information may include, but is not limited to:

- Medical records
- Disabilities
- Immunisation records, including COVID vaccine records
- Allergens

We collect health information in relation to students so that we can look after their social, emotional and medical wellbeing.

## How is Personal Information Collected, Used and Disclosed by CGGS?

CGGS may collect personal information in a number of ways including hard copy or electronic.

**Personal information provided by the individual:** By way of forms filled out by individuals (including online registrations), face to face meetings, information mornings, interviews, emails and telephone calls.

**Personal information provided by other people:** From third party disclosures, such as a report provided by a medical professional, a reference from another school or an unsolicited employment application.

**Collection of information throughout websites:** You may visit our website without identifying yourself. Information collected about your visit is not personal information as you have not revealed your identity.

We use and disclose this information aggregately for statistical analysis and to help us improve the functionality and usability of our website. Any information will be managed in accordance with this Privacy Policy.

**Cookies:** A 'cookie' is a small string of information that a website conveys to your browser for identification purposes. The 'cookie' we may use do not identify individual users, although they do identify the user's internet browser.

CGGS may use cookies on its website to hold sessional information and to personalise your current visit to CGGS' website. CGGS only uses non-persistent cookies which means they are held on your browser's memory only for the duration of your session.

Most internet browsers are set to accept cookies. If you prefer not to receive them you can adjust your browser to not accept cookies or notify you when they are being used. Should you disable or reject the use of cookies you may not be able to gain access to all the content and functionality on CGGS' website.

### What if you don't provide us with your personal information?

In some cases, we can provide information to you without identifying yourself such as general phone enquiries. However, if you don't provide us with your personal information when requested we may be unable to send you documentation or services that you are seeking. In the case of enrolments, the School may not be able to enrol or continue the enrolment of your child.

### Use of Personal Information

CGGS will only use personal information it collects for the primary purpose of that collection, and for any other secondary purposes that are related to the primary purpose of that collection and are reasonably expected by the individual or the individual has consented to.

### Who we disclose Personal Information to?

CGGS may disclose personal information to third parties for the purposes set out under the Why section, including but not limited to:

- Students, parents and guardians or students
- Another school
- Government departments and education authorities
- Medical practitioners
- Assessment and education authorities, such as ACARA and NAPLAN
- People providing services to the School, including specialist visiting teachers and sports coaches
- Financial institutions for payment processing
- Recipients of School publications, such as newsletters and magazines;

- Contracted service providers including: data technology and data storage providers, photographic, function and event organisers and business advisors (lawyers, auditors and recruiters)
- Anyone else the School is authorised to disclose information to including by law (e.g. child protection laws) or to prevent or lessen a serious and imminent threat to somebody's life or death.
- In certain circumstances, CGGS may share de-personalised aggregated data with third parties to meet its commitments as a service provider to its students. Nothing in this privacy policy prevents the School from using and disclosing de-personalised aggregated data to others.

### Cross Border disclosure storage of personal information

The School may need to disclose personal information to third parties located outside of Australia in the following situations:

- overseas recipient to facilitate a school exchange or
- to plan and deliver an International Student Program or Tour (CRICOS 00141J).

Information may be stored with a cloud service provider who may store data outside of Australia. CGGS will make all reasonable attempts to work with providers who store data in Australia and disclose this information to individuals and if reasonably possible, seek the individual's consent, prior to proceeding.

In all cases we will comply with the requirements of the Privacy Act 1998 (Cth) and the APP's that apply to cross border disclosures of personal information.

## Storage and Security of Personal Information

All staff at CGGS are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. We hold information in hard and soft copy files and databases. These are stored on:

- Personal electronic devices such as smartphones, laptops and tablets and
- Third party storage providers such as cloud storage facilities.

CGGS takes all reasonable steps to protect the personal information the School holds from misuse, interference, loss, unauthorised access, modification or disclosure. To protect the integrity of personal information we take steps such as:

- Paper records kept in locked storage
- Website security using firewalls and anti-virus software
- System access such as a password protection and segregating staff user access to information across all IT systems.

Personal information will be retained for only as long as it is needed (including for archival purposes) and it will then be disposed of lawfully and securely.

## Updating Personal Information

The School endeavours to ensure that the personal information it holds is accurate, relevant, complete and up to date. Please keep personal information up to date by logging into your personal school account online ('Parent Lounge') or by contacting the School. The School takes the necessary steps to verify the requesting individual's identification before granting access.

If the School becomes aware that the personal information is incorrect or out of date, it will take reasonable steps to rectify the data.

## Consent

The School respects every parent's right to make decisions concerning their child's education.

Generally, the School will refer any request 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.

## Access and Correction to Personal Information

You may request access to any personal information which the School holds about you or your child by contacting the Principal. We may verify your identity before we disclose, process or correct any requests to make sure the information we hold is properly protected and accurate.

There may be occasions where release of the information may be unreasonable as the release of information may have an impact on the privacy of others, or may result in a breach of the School's duty of care to the student.

At the discretion of the school, it may allow a student to give or withhold consent to the use of their personal information, independently of their parents where the student involved had reached 18 years of age.

## Complaints

If you have a complaint about how we have collected, handled or disclosed your personal information, the School has in place a Notifiable Data Breach Policy and will take appropriate, prompt action if it has reasonable grounds to believe that a serious data breach has occurred.

If a person believes the School has breached its obligations under the Australian Privacy Principles or Health Privacy Principles or wishes to make a complaint about how the School manages personal information, that person should forward a complaint in writing to the Privacy Officer (details below)

The Privacy Officer will endeavour in the first instance to deal with your complaint and take necessary steps to resolve the matter in a timely manner.

## Enquiries

Please contact the School if you have any queries about this Privacy Policy:

Post: Camberwell Girls Grammar School  
Attention Privacy Officer  
2 Torrington Street  
CANTERBURY VIC 3126

Email: [privacyofficer@cggs.vic.edu.au](mailto:privacyofficer@cggs.vic.edu.au) Phone: +61 3 9813 1166

General information about privacy is available on the website of the [Office of the Australian Information Commissioner](#) or by calling the OAIC's enquiry line on 1300 363 992.

## Legislation

- Privacy Act 1988 (Cth)
- Privacy and Data Protection Act 2014 (Vic)
- Public Health and Wellbeing Act 2008 (Vic)

## Links to other Policies

- Vaccination Policy
- Records Management Policy

## Policy Review

CGGS is committed to the continuous improvement of its policies and procedures. Unless otherwise stated, this policy remains in place until it is superseded by an amended version. This policy will be reviewed annually or more often as circumstances require. Next scheduled review date is October 2023.

The current version of this policy is available on our website.