



# Privacy Policy

## 1. Commitment to Child Safety

Camberwell Girls Grammar School is a child safe organisation which welcomes all children, young people, their families and their participation. We are committed to providing culturally inclusive environments where all our students are safe and feel safe, and have confidence their voice is heard. We promote positive interactions between students and adults, and between students and their peers based on mutual trust and respect.

Child safety is a shared responsibility. Everyone engaged or employed by Camberwell Girls has a role to play in promoting child safety. All are aware of their responsibility to promptly raise issues or concerns about a child's safety or wellbeing. We have zero tolerance for child abuse and we take proactive steps to identify children who may be at risk or experiencing vulnerability to mitigate harm or distress.

Particular attention is given to the safety needs of Aboriginal or Torres Strait Islander students, those from culturally and linguistically diverse backgrounds, students with disabilities, international students, those unable to live at home and children and young people who identify as LGBTQIA+.

We regularly seek input from students, parents, carers, staff and volunteers in our child safe practices and communicate our policies and ongoing strategies following each systematic review.

## 2. 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), the "School", collects, 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, used, accessed and disposed of 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; and
- ◆ the *Spam Act 2003 (Cth) (Spam Act)*

## 3. Scope

The policy applies to all areas of record management including personal records of Students and Staff, and business records such as financial, Work Health and Safety and governance, retained by CGGS in all media and formats, including hardcopy, digital documents, email, and websites.

This policy applies to all Students, Staff, Parents, School Council members, volunteers, visitors, contractors, consultants and the School Community.



## 4. Definitions

Term	Definition
School	Camberwell Girls Grammar School (Camberwell Girls)
The School Community	Parents, students, contractors, visitors, volunteers, neighbours, suppliers, families on the enrolment wait-list.
Parents	Prospective, current and past parents, guardians, carers.
Students	All students enrolled at CGGS, including International Students and Old Grammarians.
Staff	All staff employed at CGGS.
Privacy Act	Privacy Act 1988 (Cth)
Spam Act	Spam Act 2003 (Cth)

## 5. Policy Statement

### 5.1. What is Personal Information?

Personal information is information or an opinion, whether true or not and whether recorded in a material form or not, that identifies an individual or allows an individual to be identified.

#### 5.1.1. Sensitive Information

A subset of personal information that is generally afforded a higher level of privacy protection, such as 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. We only collect sensitive information where it is reasonably necessary for our functions or activities and either:

- ◆ the individual has consented.
- ◆ we are required or authorised by the law (including applicable privacy legislation) to do so.

For example, we collect health information in relation to Students so that we can look after the Student's educational, social, emotional and medical wellbeing.

#### 5.1.2. 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.

#### 5.1.3. Employee Records

We are generally exempt from the Privacy Act when we collect and handle employee records. Therefore, this policy does not apply to employee records. However, this Policy applies to the protection of employee health information, if/where collected, under the State health privacy legislation.



## 5.2. What Information is Collected by CGGS?

The type of personal information that the School collects and holds depends on the type of relevant association you have with us as a student, parent, staff member, contractor, volunteer, supplier, job applicant, alumni, visitor or other.

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 (Tax File Number)
- ◆ 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
- ◆ Allergens

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

## 5.3. Why is personal information collected by the School?

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.
- ◆ keep parents and guardians informed about their child's progress and wellbeing.
- ◆ provide suitable administration for the School.
- ◆ 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.
- ◆ perform research and statistical analysis.
- ◆ protect the security of our offices and the property held on our premises.
- ◆ protect the health and wellbeing of our staff, students and visitors.
- ◆ recruit staff and contractors.
- ◆ 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.

### **5.3.1. 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.
- ◆ advising us if you receive a marketing call that you no longer wish to receive these calls.

## **5.4. 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.

### **5.4.1. 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.

### **5.4.2. 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.

### **5.4.3. 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.

### **5.4.4. Cookies**

A 'cookie' is a small string of information that a website conveys to your browser for identification purposes. The 'cookie' we may use does 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 the School's 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.

#### **5.4.5. 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.

#### **5.4.6. 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.

#### **5.4.7. Who we disclose Personal information to?**

CGGS may disclose personal information to third parties for the purposes set out under the Why section of this policy, 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.

#### **5.4.8. 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 and 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.



## 5.5. 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:

- ◆ 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 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.

## 5.6. 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' and 'Consent2Go') 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.

## 5.7. 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.

## 5.8. 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.

## 5.9. Complaints

If you have a complaint about how we have collected, handled or disclosed your personal information, the School has a Notifiable Data Breach Policy in place 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.

## 5.10. 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@cogs.vic.edu.au](mailto:privacyofficer@cogs.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](#) (OAIC) or by calling the OAIC's enquiry line on 1300 363 992.

## 6. Related Documents

- ◆ Vaccination Policy
- ◆ Records Management Policy
- ◆ Notifiable Data Breach Policy
- ◆ Complaints Management Policy – School Community
- ◆ Volunteer Policy
- ◆ Child Safety Response and Reporting Policy
- ◆ Enrolment Policy
- ◆ Whistleblower Protection Policy

## 7. Legislative Context

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



## 8. Governance

### 8.1. Document Details

Document Details	
Title	Privacy Policy
Policy Approver	Principal
Date Approved	May 2024
Policy Owner	Risk and Compliance Manager
Date Created	May 2024
Review Timeline	Every 2 years
Date of Next Review	May 2026

### 8.2. Version Control

Version	Date	Description
5.1	May 2024	New policy template Rolled over as part of cyclical review

### 8.3. Audience

Audience	Publication Location
Parents, Students, Staff, School Community	<a href="#">CGGS Website</a>