

# Wenona Privacy Policy |

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## Rationale

This Privacy Policy sets out the School's approach to collecting, storing and using your personal information, including how to complain and how to deal with a complaint.

The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 (Privacy Act) and the Australian Health Order (Australian Health Privacy Principles), which are contained in the Health Records and Information Protection Act 2002 (NRPA).

### Australian Privacy Principles and Health Privacy Principles

Principles do not apply to certain treatment of an employee record. As a result, this Privacy Policy does not apply to the treatment of an employee record if the treatment is directly related to a current or former employment relationship between the School and the employee.

The School may, from time to time, review and update this Privacy Policy to take account of new laws and to make sure it remains appropriate to the changing school environment. The current version of this Privacy Policy can be found on our website.

## Kinds of personal information we collect

The School collects a range of information from its students, parents/guardians, employees and contractors, including health and other sensitive information about:

- 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 date of birth, gender, location), background, previous school and religion;
  - parents' education, occupation, language spoken at home, nationality and country of birth;
  - medical information, eg details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports and names of doctors;
  - conduct and complaint records, or other behaviour notes, and school reports;
  - financial information;
  - counselling reports;
  - health fund details and Medicare number;
  - any Family Court orders;
  - criminal records;
  - volunteering information;
  - photos and videos at School events;
- job applicants, volunteers and contractors, including:
  - date of birth, and full name, contact details (including next of kin);
  - information on job application;
  - professional development history;
  - financial information;

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- ~~health information – details of disability and/or allergies, and medical certificates;~~
- ~~personal information about the individual's education, training, work experience, leave details;~~
- ~~photos and videos of School events;~~
- ~~work mobile and private emails (when using a work email address) and Internet browsing history;~~
- ~~information that has been communicated to the School in the course of the individual's details, and any other information necessary for the particular contact with the School.~~

**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:** Personal information may also be provided by other members of the family, or by another individual or third party, for example, a medical professional, a reference from another school, or a referee for a job applicant. If a student provides personal information about another person, the student must obtain the consent of the student.

**Personal information from other sources:** The School may also collect personal information through surveillance activities, eg CCTV security cameras, and student internet use and email monitoring.

## ~~How does the School use all the personal information it collects?~~

The School uses personal information for a range of purposes, which depend on our relationship with you, and include but are not limited to the following:

### **Students and Parents**

- ~~providing schooling and school activities;~~
- ~~notifying parents of the individual's needs, talents 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, newsletters, termly school reports;
- day-to-day management of the student;
- ~~keeping records of identities, general health and health care;~~
- seeking donations for the School (see the 'Fundraising' section of this Privacy Policy);
- to notify the School's legal obligations and allow the School to discharge its duty of care.

### **Volunteers**

The School collects personal information about volunteers against the School's invitation to conduct associated activities, for example, ~~Wenona Board of Governors (the "WBOG")~~, ~~Wenona Alumni~~, ~~Wenona Foundation~~, ~~Wenona Board of Governors~~, and general volunteers, to enable the School and the volunteers to work together. Information collected may include, but is not limited to the following:

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- to contact you about and administer the volunteer position;
- for insurance purposes; and
- satisfying the ~~child protection legislation or other relevant legislation, for example, in relation to child protection legislation~~.

- assessing, and (if successful), ~~the individual's application for employment~~;
- 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.

## Information 20 Who we disclose personal information

disclose personal information, including sensitive information, for educational, care and administrative purposes, and to seek support and advice. This may include providing information 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)~~;
  - ~~trustees including music drama dinner debating and extra tutors and coaches, volunteers, and counsellors;~~
  - ~~organisations in association with fundraising (see the 'Fundraising' section of this Privacy Policy);~~
  - providers of specialist advice
- ~~list visiting~~
- ~~Microsoft and Microsoft 365;~~
- providers of learning and assessment tools;
  - ~~the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the 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 messages;~~
  - students' parents or guardians;
  - anyone you authorise the School to disclose information to;
- ~~information to by law, including child protection laws.~~

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## 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 an appropriate level of security in accordance with the relevant laws and regulations.

The School may use cloud computing and other technologies to store personal information in certain circumstances. Refer to the [Cloud Computing and Other Technologies](#) section for more information.

The School may also use third party service providers to store personal information. Refer to the [Sending and Storing Information Overseas](#) section for more information.

## Sending and storing information overseas

The School may send personal information overseas in certain circumstances. Refer to the [Cloud Computing and Other Technologies](#) section for more information.

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 commercial 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 server located outside Australia.

An example of such a cloud service provider is Microsoft/Microsoft 365 which stores and processes limited personal information for this purpose. School personnel and its service providers have the ability to access, monitor, use or disclose emails, communications, (eg instant messaging) documents and associated administrative data for the purposes of administering your cloud services and ensuring its proper use.

## Fundraising and Marketing

The School treats marketing and asking for donations for the future growth and development of the School as important components that the School continues to provide. One of the 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, Parent Association and/or Alumnae organisation and, on occasions, external fundraising organisations.

Parents, staff, contractors, and other members of the wider School community may from time to receive fundraising information, for example, publications sent via email or through the website [www.wenonafund.org](http://www.wenonafund.org).

If you do not want to receive fundraising communications from us, please contact the Executive Director, Wenona Foundation.



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## Consent and rights of access

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

Generally, the School will release personal information about a student to the student's Parents or to the student, if given consent by the student's Parents or to the student, if given on behalf of the student, and notice to Parents will act as notice given to the student.

Parents may request access to personal information held by the School about them or their child by sending a written request to the School Principal or in my capacity as Principal. I will refer 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,

consent where release of the information would have an unreasonable impact on the individual concerned, such as breaching the relevant obligations of the School or of law to the 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 be done where the student has reached the age of majority and the student and/or the student's personal circumstances warrant it.

## Enquiries and complaints

If you would like further information about the way the School manages the personal information it holds, or if you believe that the School has breached the Australian Privacy Principles or the Health Privacy Principles, please contact the School Principal. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

If you are not satisfied with the 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).