

## ATHENA SCHOOL PRIVACY POLICY

The School needs to collect private and confidential information from staff, students and parents to determine suitability for employment, to assess educational and health needs and to provide the government information about family socio-economic information for school grants allocation. The Athena School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This Act specifies the information to be included in the policy.

The purpose of this policy is to provide the procedures and guidelines for staff to protect the privacy of all community members and comply with the Commonwealth Privacy Act and the 13 Australian Privacy Principles. The principles that must be included in this policy form the 'Procedure' section of this policy.

### Procedure

#### (a) Who We Collect Personal Information From

- We collect personal information from students, parents, prospective parents, job applicants, staff, volunteers and others including contractors, visitors and others that come into contact with the school.
- In referring to 'sensitive information', a 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 you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

#### (b) Kinds of Personal Information Collected

- *Personal Information you provide:* A school will generally collect personal information held about an individual by way of forms filled out by Parents or pupils, face-to-face

meetings and interviews, emails and telephone calls. On occasions people other than Parents and pupils provide personal information.

- *Personal Information provided by other people:* In some circumstances a school may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.
- *Personal Information the School collects:* The school keeps attendance records, assessments, work samples and school reports.
- *Health Information:* (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.
- *Exception in relation to employee records:* Under the Privacy Act the Australian Privacy Principles [and Health Privacy Principles] do not apply to an employee record. As a result, this Privacy Policy does not apply to the School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the school and employee.

(c) How Personal Information Is Collected and Held

- *Directly from the community member:* Where possible the school has attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form or a Medical Form).
- *Other transactions:* With the nature of our business we also collect personal information through email, letters, notes, over the telephone, in face to face meetings, through financial transactions.
- *Other people:* We may also collect personal information from other people (e.g. a personal reference) or independent sources (e.g. a telephone directory), however we will only do so where it is not reasonable and practical to collect the information from you directly.

(d) The Management and Security of Personal Information

Staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals. The security of your personal information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorized access, modification or disclosure. These steps include:

- Restricting access to information on the school's 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 that hard copies of sensitive health information are stored in a lockable office or in our secure off site archives. 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 information technology 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 electronic 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.
- Personal information we hold that is no longer needed is destroyed in a secure manner, deleted as appropriate. Our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

(e) The Purposes for Personal Information

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include but are not limited to:

- providing education, pastoral care, extra-curricular and health services;
- satisfying our legal obligations including our duty of care and child protection obligations;
- keeping parents informed as to school community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;
- supporting community based causes and activities, charities and other causes in connection with the School's functions or activities;
- helping us to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis;

- School administration including for insurance purposes, debt collection, the employment of staff; the engagement of volunteers.

(f) Access to and Disclosure of Personal Information

- We may disclose personal information, including sensitive information, held about an individual to another school; government departments; medical practitioners; people providing services to the school, including specialist visiting teachers, counsellors and sports coaches; recipients of school publications, such as newsletters and magazines; parents; anyone you authorise the school to disclose information to; and anyone to whom we are required to disclose the information by law.
- We only collect sensitive information reasonably necessary, for one or more of these functions or activities, if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety, or another permitted general situation (such as locating a missing person) or permitted health situation (such as the collection of health information to provide a health service) exists.
- If we do not have the relevant consent and a permitted health situation or permitted general situation does not exist, then we may still collect sensitive information provided it relates solely to individuals who have regular contact with the school in connection with our activities. These individuals may include students, parents, volunteers, and other individuals with whom the school has regular contact in relation to our activities.
- We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.
- There may also be occasions where parents/carers are denied access, to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the school's duty of care to the student.
- You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.
- If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

(g) Privacy Complaints

If you wish to make a complaint about a breach by us of the Australian Privacy Act you may do so by providing your written complaint by email, letter, facsimile or by personal delivery to any one of our contact details as noted below. We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

You can contact us about this Policy or about your personal information by:  
Emailing [enquiries@athena.nsw.edu.au](mailto:enquiries@athena.nsw.edu.au) Calling 02 9557 0022 or writing to our Office Manager (28 Oxford Street. Newtown NSW 2042)

If practical, you can contact us anonymously (i.e. without identifying yourself). However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

**Link to other policies/sources**

- Duty of Care and Child Protection Policies, The Athena School
- Privacy Compliance Manual Association of Independent Schools NSW 2019
- Australian Privacy Principles 2017 and Privacy Act 1988

Approved by  
Executive Council  
The Athena School Ltd

