



Yarranlea Limited

POL570.8_C Privacy Policy

Purpose:	Yarranlea Limited is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the Yarranlea Primary School and Yarranlea Outside School Hours Care (hereafter 'Yarranlea') and describes how Yarranlea uses and manages personal and confidential information provided to or collected by it.	
Scope:	The policy applies to board members, employers, employees, supervisors, educators, volunteers, parents/guardians, children, students, contractors, and people visiting the school site; and the type of information the school collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.	
Status	Approved	
Supersedes:	POL005	
Authorised by:	Board	Date of Authorisation: 20/9/2022
Review Date:	Annually, as appropriate, to take account of new laws and technology, changes to school's operations and practices and to make sure it remains appropriate to the changing environment.	Next Review Date: September 2023
Policy Owner:	Yarranlea Limited	
Modifications:	Updated to reflect changes ISQ wording Use of Childcare Centre Desktop template	
Previous Modifications:		
Date of Modification:		
Saved to SharePoint Folder by:		
Date saved to SharePoint folder:		

Date Control Register updated:	
References:	<ul style="list-style-type: none"> • Australian Privacy Principles • Privacy Act 1988 (Cth)
Related Policies:	<ul style="list-style-type: none"> • Child Protection Policy • Inclusion Policy

Exception in Relation to Employee Records:

Under the *Privacy Act 1988 (Cth)* (**Privacy Act**), the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to Yarranlea's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Yarranlea and employee.

Policy

This Privacy Policy sets out how Yarranlea manages personal information provided to or collected by it. Yarranlea is bound by the Australian Privacy Principles contained in the Privacy Act. Yarranlea may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Yarranlea's operations and practices and to make sure it remains appropriate to the changing school environment.

What kinds of personal information does Yarranlea collect and how does Yarranlea collect it?

The type of information Yarranlea collects and holds includes (but is not limited to) personal information, 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 Yarranlea:
 - name, contact details (including next of kin), date of birth (including birth certificates), gender, language background, previous school and religion;
 - parents' education, occupation and language background;
 - medical information (e.g. details of disability and/or allergies, immunisation records, absence notes, medical reports and names of doctors);
 - conduct and complaint records, or other behaviour notes, and school reports;
 - information about referrals to government welfare agencies;
 - counselling reports;
 - health fund details and Medicare number;
 - any court orders and custody arrangements;
 - Child Care Subsidy information;
 - Centrelink Customer Reference Number (CRN);

- dietary requirements;
- banking or credit card details;
- volunteering information; and
- photos and videos at school and OSHC events.
- job applicants, staff members, volunteers and contractors:
 - name, contact details (including next of kin), date of birth, and religion;
 - information on job application;
 - professional development history;
 - educational qualifications and professional registration details;
 - background checks
 - salary and payment information, including superannuation and tax details;
 - medical information (e.g. details of disability and/or allergies, and medical certificates);
 - complaint records and investigation reports;
 - leave details;
 - photos and videos at school and OSHC events;
 - workplace performance review information;
 - work emails and private emails (when using work email address) and Internet browsing history
- other people who come into contact with Yarranlea including name and contact details and any other information necessary for the particular contact with the school.

Personal Information you provide

Yarranlea will generally collect personal information held about an individual by way of forms, including online forms, filled out by parents or students or staff, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents and students and staff provide personal information.

Personal Information provided by other people

In some circumstances Yarranlea 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.

How will Yarranlea use the personal information you provide?

Yarranlea will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented, as outlined below.

Students and Parents

In relation to personal information of students and parents, Yarranlea's primary purpose of collection is to enable Yarranlea to provide schooling to students enrolled at the school and care for children enrolled in OSHC and Vacation Care, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of

Yarranlea. This includes satisfying the needs of parents, the needs of the students and the needs of Yarranlea throughout the period the student is enrolled at Yarranlea and beyond.

The purposes for which Yarranlea uses personal information of students and parents include:

- to keep parents informed about matters related to their child's schooling and care, through correspondence, newsletters and magazines
- day-to-day administration of Yarranlea
- looking after student's educational, social and medical wellbeing
- seeking donations and marketing for Yarranlea
- maintaining Yarranlea's historical documentation
- to satisfy Yarranlea's legal obligations and allow the school to discharge its duty of care.

In some cases where Yarranlea requests personal information about a student or parent, if the information requested is not provided, Yarranlea may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

On occasions information such as academic and sporting achievements, student activities and similar news is published in newsletters and magazines, on our intranet, on our website and on our Facebook page. This may include photographs and videos of student activities such as learning events, concerts, celebration events, sporting events, camps and excursions. Yarranlea will obtain permissions annually from the student's parent or guardian if we would like to include such photographs or videos or other identifying material in our promotional material or otherwise make this material available to the public such as on the internet.

Job Applicants, Staff Members and Contractors

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

The purposes for which Yarranlea uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be
- for insurance purposes
- seeking donations and marketing for Yarranlea
- to satisfy Yarranlea's legal obligations, for example, in relation to child protection legislation.

Volunteers

Yarranlea also obtains personal information about volunteers who assist Yarranlea in its functions or conduct associated activities, such as Parents and Friends members, alumni and past parents, to enable Yarranlea and the volunteers to work together.

Marketing and Fundraising

Yarranlea treats marketing and seeking donations for the future growth and development of the school as an important part of ensuring that Yarranlea continues to provide a quality learning

environment in which both students and staff thrive. Personal information held by Yarranlea may be disclosed to organisations that assist in the school's fundraising, for example, the Yarranlea Parents and Friends.

Parents, 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, may be used for marketing purposes.

If you would like to opt-out of direct marketing please contact the School Principal on 0474 111 676.

Who might Yarranlea disclose Personal Information to and store your information with?

Yarranlea may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes. This may include to:

- another school or staff at another school
- government departments (including for policy and funding purposes)
- medical practitioners
- people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools
- Child Care Subsidy software provider
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- people providing administrative and financial services to Yarranlea
- recipients of Yarranlea publications, such as newsletters and magazines
- students' parents or guardians
- anyone you authorise Yarranlea to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Sending and Storing Information Overseas

Yarranlea may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Yarranlea will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Yarranlea may use online or 'cloud' service providers to store personal information and to provide services to Yarranlea that involve the use of personal information, such as 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. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

For example, Microsoft Office 365 is a cloud service provider used by Yarranlea. Microsoft Office 365 provides email, data storage and other administrative functions. The data centres where personal information is likely to be kept are located in Australia. Some functions relating to Microsoft Teams may be stored in servers in the Asia-Pacific region. Additionally, some student online applications may store login data overseas, for example, IXL Maths stores such data in the USA.

Sensitive Information

In referring to 'sensitive information', Yarranlea 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 required by law.

Management and Security of Personal Information

Yarranlea's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. Yarranlea has in place steps to protect the personal information Yarranlea 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.

Data Breaches

It will be deemed that an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (**the affected individuals**)
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result
- the information is lost in circumstances where:
 - unauthorised access to, or unauthorised disclosure of, the information is likely to occur
 - assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

What must the school do in the event of an 'eligible data breach'?

If Yarranlea suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then Yarranlea will be required to lodge a statement to the Privacy Commissioner (**Commissioner**). Where practical to do so, the school entity will also notify the affected individuals. If it is not practicable to notify the affected individuals, Yarranlea will publish a copy of the statement on its website or publicise it in another manner.

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

Access and Correction of Personal Information

Under the *Privacy Act*, an individual has the right to seek and obtain access to any personal information which Yarranlea holds about them and to advise Yarranlea of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

To make a request to access or to update any personal information Yarranlea holds about you or your child, please contact the School Principal in writing. Yarranlea may require you to verify your identity and specify what information you require. Yarranlea may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, Yarranlea will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

The School will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

Consent and Rights of Access to the Personal Information of Students

Yarranlea respects every parent's right to make decisions concerning their child's education. Generally, Yarranlea will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. Yarranlea 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.

As mentioned above, parents may seek access to personal information held by Yarranlea about them or their child by contacting the School Principal. However, there will 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 Yarranlea 's duty of care to a student.

Yarranlea may, at its discretion, on the request of a student grant that student access to information held by Yarranlea about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Enquiries and Complaints

If you would like further information about the way Yarranlea manages the personal information it holds, or wish to make a complaint about Yarranlea's breach of the Australian Privacy Principles please contact the School Principal on 0474 111 676 Yarranlea 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.