

Privacy Policy



Hills
Grammar





Privacy Policy

Approval and Review	Details
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Responsibility	Deputy Principal/Head of Senior School
Approver	Principal
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Purpose

Hills Grammar regards its partnership with families as fundamentally important and will communicate with parents and students regularly on matters relating to teaching and learning, attendance, School activities and discipline. When making judgments about how, when, what and with whom to communicate, the School takes account of its responsibilities in relation to parents and students respectively, matters of privacy, the sensitivity of the information, its general duty of care and the wellbeing of those involved.

Application and Scope

This policy applies to the School, its staff, volunteers, third party contractors and external education providers, for the welfare and benefit of all members of the School community.

Related Legislation

This Policy has been prepared to meet the requirements of the Australian Privacy Principles contained in the *Commonwealth Privacy Act 1988* (Privacy Act). In relation to health records the School is also bound by the New South Wales Health Privacy Principles contained in the *Health Records and Information Privacy Act 2002*. The School has additional relevant obligations under the *Workplace Surveillance Act 2005*, the *Privacy and Other Legislation Amendment Act 2024* and the *Surveillance Devices Act 2007*.

Collection of Personal Information

Hills Grammar will endeavour to collect only information, which is reasonably necessary for its functions or activities.

The type of information that the School collects and holds includes (but is not limited to) Personal Information including health and other sensitive information about:

- students, prospective students and parents and/or guardians (parents) before, during and after the course of a student's enrolment at the School;
- employees, job applicants, volunteers and contractors; and,
- other people who come into contact with the School (including alumni).

The School will generally collect this information by way of digital or hard copy collection documents, other online applications, the Hills Grammar website, School Information Management System, face-to-face meetings, events and interviews, emails and telephone calls. In some circumstances, the School may be provided with personal information about an individual from a third party, for example a report from a medical professional.

Use of personal information

Generally, the School may use personal information for the following purposes:

- To keep parents informed about matters related to the child's schooling including teaching and learning, attendance, school activities, and discipline through communications such as reports and parent-teacher interviews, meetings, etc;
- To improve the experience of students, educators and the School community
- To perform day-to-day administration;
- To look after students' educational, social and medical wellbeing;
- To assess eligibility for scholarship and/or financial support purposes;
- To seek donations and conduct marketing activities for the School;
- To celebrate individual achievement in academic, sport, music or other pursuits;
- To administer an individual's employment or contract;
- For insurance purposes; and,
- To satisfy the School's legal obligations, for example, child protection legislation, and allow the School to discharge its duty of care.

Disclosure of Personal Information

The people and organisations to whom the School may disclose Personal Information held about an individual include:

- Government departments and law enforcement agencies;
- People providing services to the School, including specialist visiting teachers, counsellors, legal advisors and sports coaches;
- Providers of learning and assessment tools;
- Assessment and educational bodies
- Another school;
- Medical practitioners;
- Recipients of School publications, like newsletters and magazines (excluding sensitive information)
- Authorised School Parent volunteers;
- The Hills Grammar Parent and Friends Association;
- People whom the relevant student, parents, job applicant, volunteer, contractor or other person authorise the School to disclose information to; and

- Other entities as required by law or where disclosure is necessary to prevent a threat to life, health or safety.

The School will only disclose information to a person or organisation after taking reasonable steps to satisfy itself that the person or organisation:

- has adopted information handling and storage protocols complying with the Australian Privacy Principles; and,
- will keep that disclosed information confidential.

The School does not sell or license Personal Information to any person or organisation.

The School may disclose Personal Information (including sensitive information) to an overseas recipient, for instance, to facilitate an international exchange or overseas field trip. However, the School will not send Personal Information about an individual to an overseas recipient:

- without expressly informing the individual that such a disclosure may occur; or
- unless the School reasonably believes the disclosure is necessary to prevent a serious threat to the life, health or safety of any individual or to public health or safety; or
- where a permitted general situation (Privacy Act, Section 16A) exists.

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 Personal Information, such as services relating to email, instant messaging and education and assessment applications. Limited Personal Information may be provided to these external service providers to enable them to authenticate users. This Personal Information may be stored in the "cloud," this may be stored in a location outside of Australia.

Storage, retention and security of Personal Information

Hills Grammar has in place steps to safeguard its information management systems and protect the Personal Information it holds from misuse, loss, unauthorised access by use of various methods including locked storage of physical records, secured databases and servers and appropriate user access controls.

Updating Personal Information

Hills Grammar endeavours to ensure that the Personal Information it holds is accurate, complete and up to date. Families are asked to review and update their personal information upon commencement and then annually each January. It is each family's responsibility to ensure the School holds the most up to date information for their family.

Any person who believes the information the School holds about them requires changing, or is out of date, should contact the School.

If the School is satisfied that Personal Information about an individual is inaccurate, incomplete, not up-to-date, irrelevant or misleading and an individual requests the School to correct the information, we will take reasonable steps to correct the information, having regard to the purpose for which it is held.

Right to check Personal Information

Under the Australian Privacy Principles, any person may be able to obtain a copy of the Personal Information Hills Grammar holds about them. The Australian Privacy Principles provide some exceptions in this regard.

To make a request to access this information, a person should write to the Principal. The School may require verification of identity and specification of the information required and may charge a fee to recover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If this is the case, Hills Grammar will advise the likely cost in advance.

Students will generally have access to their Personal Information through their parents, but older pupils may seek access themselves (as set out in the following section).

Consent to collection, use and disclosure of Personal Information

Generally, the School will refer requests for consent to collect, use and disclose Personal Information pertaining to a student to their parents.

In circumstances where a student is aged below 15 years and the School considers it appropriate in accordance with the Australian Privacy Principles, the School will treat consent to collect, use and disclose Personal Information given by parents as consent given on behalf of the pupil, and notice to parents will act as notice given to the student.

In circumstances where the student is aged 15 years or above and the School considers it appropriate in accordance with the Australian Privacy Principles, the School will seek consent to collect, use and disclose Personal Information from both the parents and the student and issue relevant notices to both the parent and the student.

Access to Personal Information held by Hills Grammar

Circumstances may arise where parents and/or students seek access to Personal Information Hills Grammar holds in a manner, which differs from the School's regular pattern of communication. When making judgments concerning access in such cases, the School takes account of its responsibilities in relation to parents and students respectively, the Australian Privacy Principles, the sensitivity of the information, its general duty of care and the wellbeing of those involved.

Requests for access to Personal Information the School holds are addressed to the Principal in writing.

Notification of Eligible Data Breaches

In the event that Hills Grammar becomes aware of or has reasonable grounds to suspect an unauthorised access to, modification or disclosure of, or other interference with, misuse or loss of control of Personal Information held by the School, an investigation will occur.

In the event that investigations identify an eligible Data Breach the school will notify persons affected by the breach and the Office of the Australian Information Commissioner in accordance with the Privacy Act.

Further Information

Any persons seeking further information about how Hills Grammar manages the Personal Information it holds or wishes to make a complaint regarding the School's compliance with the Australian Privacy Principles should contact the Director of Advancement and Engagement.

The School will investigate any complaints and advise the complainant of any decision arising from the investigation as is practicable to do so.

Exception in relation to employee records

Under the Privacy Act and the Health Records 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 Hills Grammar and an employee.