



LINDISFARNE
Anglican Grammar School

Lindisfarne Privacy Policy

1. RATIONALE

Lindisfarne Anglican School trading as Lindisfarne Anglican Grammar School ABN 91 552 839 641 ("School") complies with the Australian Privacy Principles ("APPs"), which are part of the *Privacy Act 1988* (Cth) ("Privacy Act") and the Health Privacy Principles, which are part of the *Health Records and Information Privacy Act 2002* (NSW). The School recognises and acknowledges that the protection of individuals' privacy is important and required by law. This Privacy Policy also applies to Lindisfarne Anglican Grammar School Foundation Pty Ltd ACN 666 098 791 ("Foundation"), which supports the School by facilitating donations and fundraising (together, "Lindisfarne", "we", "us", "our").

Lindisfarne recognises that protecting individuals' privacy is of fundamental importance and required by law. This Privacy Policy explains:

- what sorts of personal information Lindisfarne collects;
- how Lindisfarne may use that personal information and to whom it may be disclosed;
- how Lindisfarne protects the personal information we hold from unauthorised use or disclosure; and
- how you can access and correct the personal information we hold about you, and your options to complain if you believe we have breached our privacy obligations to you.

Lindisfarne reserves the right (at its discretion) to modify, amend or replace this Privacy Policy from time to time to take account of new laws and technology, changes to the School's operations and practices and to make sure it remains appropriate to the changing school environment. The modified, amended or replaced policy will be posted by the School to its website in place of the older Privacy Policy and notified to students, parents and/or guardians.

2. SCOPE

This Privacy Policy applies to students, parents and/or guardians ("Parents"), volunteers, homestay providers, contractors, service providers, job applicants, visitors, website users and other people with whom the School ordinarily interacts.

This Privacy Policy does not apply to employees or employee records, as the handling of employee records by a private sector employer is exempt from the Privacy Act if it is directly related to the employee's current or former employment relationship.

However, if you do have questions regarding the handling of your employee records, you can contact our Director of Human Resources or Deputy Principal on the details below for assistance.

3. DEFINITION

3.1. Personal information

According to the Privacy Act, "personal information" means information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

3.2. Sensitive Information

According to the Privacy Act, "sensitive information" means personal information relating to a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, membership of a trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices, or criminal record. It also includes health or genetic information about an individual or biometric information used for specific purposes.

We will only:

- collect sensitive information where you agree and it is reasonably necessary for Lindisfarne's functions and activities;
- use and disclose sensitive information for the purpose for which it was collected or a directly related secondary purpose that you would reasonably expect, unless you agree otherwise,
- or where the collection, use or disclosure of the sensitive information is otherwise authorised or required by law.

4. TYPES OF PERSONAL INFORMATION WE COLLECT AND HOLD

Lindisfarne collects and holds a range of personal information, including some health and other sensitive information, about students, parents and/or guardians ("Parents"), volunteers, homestay providers, contractors, service providers, job applicants, visitors, donors and website users, which may include the following:

4.1. Students

Before, during and after a student's enrolment at the School we may collect the following information about the student:

- full name, date of birth, gender, contact details including emergency contacts and next of kin;
- nationality, languages spoken;
- details of previous schooling;
- health fund and Medicare details;
- school reports, behaviour and complaint reports and/or notes;
- counselling reports;
- professional or trade membership details;
- information regarding referrals to government welfare agencies;
- details of any relevant court orders; and
- photos and/or videos (taken at School events or by closed-circuit television cameras ("CCTV")).

We may also collect the following types of sensitive information about students only where necessary or appropriate, or the student / Parent has otherwise consented:

- racial or ethnic origin (including if students identify as Aboriginal or Torres Strait Islander);
- religious background;
- sexual orientation (if it becomes known to the School); and
- health information (disabilities / allergies / medical certificates, etc. – includes mental health).

4.2. Overseas Students

Where relevant, we may collect the following additional information about overseas students:

- residency, visa status / citizenship;
- passport number and expiry date;
- visa number and expiry date; and
- dietary information for catering.

4.3. Parents

Before, during and after a student's enrolment at the School we may collect the following information about their Parents:

- full name, date of birth / age, gender, contact details;
- nationality, languages spoken;
- occupation and educational history;
- financial information (particularly if requesting alternative fee arrangements due to financial hardship), such as employment details, salary and income, assets and liabilities, and supporting documents.

4.4. Job Applicants, Volunteers, Homestay Providers, Service Providers and Contractors

The School may collect the following types of personal information about other people who interact with the School:

- full name, date of birth / age, contact details, emergency contact / next of kin;
- nationality, languages spoken;
- resumes, employment histories and qualifications, training records and competency assessments, references, professional development history;
- salary and payment information, including tax file number and superannuation details;
- complaint records and investigation reports;
- residency / visa status / citizenship;
- professional or trade membership details;
- Working with Children Check (WWCC) result;
- leave details;
- photos and/or videos (taken at School events or by closed-circuit television cameras ("CCTV")); workplace surveillance records; and

- emails and Internet browsing history when using the School email address or resources.

We may also collect the following types of sensitive information only where necessary or appropriate, or you have otherwise consented:

- medical information (e.g. details of disability and/or allergies, and medical certificates); and
- criminal record.

If you are a homestay provider, we may also collect the following types of sensitive information:

- racial or ethnic origin (including if you identify as Aboriginal or Torres Strait Islander); and
- religious background.

4.5. Donors

The Foundation may collect the following types of personal information about people who donate to the School:

- full name, contact details;
- details of previous history with the School; and
- financial information, including credit card details.

4.6. Website Users

We may also collect information about you when you access our website and other online platforms using technology called 'cookies'. That information includes the pages viewed and the information downloaded, the IP address of the computer or mobile used to visit our website, the page from where the individual visited our website, the type of browser used, unique device identifiers and information about websites visited before the individual visited our website. You can configure your browser to disable cookies, but some parts of our website may not function properly (or at all) if cookies are disabled.

5. PURPOSE FOR COLLECTING PERSONAL INFORMATION

Lindisfarne's primary purpose for collecting personal information is to support the functions and activities of the School, including:

- generating statistical data and reports for policy and funding purposes;
- organising and managing events/functions;
- day-to-day administration of the School;
- for insurance purposes, internal accounting and administration;
- for publications such as magazines and newsletters, including publication of that material (both physically and online);
- seeking donations and marketing for the School;
- enabling the Department of Education and Training to comply with their reporting requirements; and
- reporting to educational and Government authorities.

5.1. Students and Parents

The School's primary purpose for collecting personal information about students and Parents is to enable the School to provide schooling to students enrolled at the School, exercise its duty of care, and perform all the associated activities that are necessary to enable students to take part in all the activities of the School, including:

- supporting students' social and emotional wellbeing and health;
- communicating with Parents through correspondence, newsletters and magazines;
- maintaining good order and management of the School;
- day-to-day administration of the School;
- fulfilling legal requirements including:
 - o taking reasonable steps to reduce the risk of harm to students, staff and visitors;
 - o making reasonable adjustments for students with disabilities; and
 - o ensuring, as far as reasonably practicable, the health and safety of people in the School workplaces,

And in particular with regard to overseas students:

- complying with the School's obligations under Australian laws (such as the Education Services for Overseas Students Act 2000 (Cth) and the National Code of Practice for Providers of Education and Training to Overseas Students);
- the Provider Registration and International Student Management System (PRISMS) and Overseas Student Health Cover (OSHC); and
- organising hospital, medical, transport, catering, homestay and tutoring services.

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

5.2. Job Applicants, Staff Members, Volunteers, Service Providers and Contractors

The School's primary purpose for collecting personal information regarding other people who interact with the School is to assess their suitability and manage the relationship, including:

- fulfilling legal requirements, including:
 - o taking reasonable steps to reduce the risk of harm to students, staff and visitors;
 - o make reasonable adjustments for individuals with disabilities; and
 - o complying with child protection legislation; and
- assessing an applicant's suitability for employment or a volunteer position and enabling the School and the applicant or volunteer to work together.

5.3. Donors

The Foundation's primary purpose for collecting personal information regarding donors is to facilitate current and future donations and share information regarding School

functions, initiatives and events.

6. HOW DOES LINDISFARNE COLLECT PERSONAL INFORMATION?

Lindisfarne collects personal information about an individual directly from that individual, where reasonable and practicable to do so. We collect the information in a variety of ways, including:

- electronic or paper documents (including forms, letters and invoices), face-to-face meetings and interviews, emails and telephone calls;
- from our website using various technologies, including 'cookies';
- online tools (including apps or other software used by the School);
- photographs, video or other recordings;
- polls, surveys and/or questionnaires;
- from other parties (such as education agencies, medical practitioners or other schools) to enable the School to discharge its duty of care;
- from medical forms, incident reports, documents pertaining to occupational health and safety requirements (including capacity to work certificates), and NSW Education Standards Authority or Working with Children clearance requirements, provided by the applicant, the employee, or any other third party authorised by the applicant or employee;
- from other parties (such as recruiters, job applicants, representatives or referees, or social media sites); and
- from publicly available sources.

6.1. Collection of personal information through CCTV

The School installs, uses and maintains CCTV cameras around the School campus in accordance with relevant surveillance laws. Where installed, CCTV cameras are appropriately sign-posted at all School entrances and exits, as well as in hallways and other open areas.

The School will only use or disclose CCTV footage collected about a person in accordance with applicable legislation which includes the *Surveillance Devices Act 2007* (NSW) and *Privacy Act 1988* (Cth) for such purposes that are necessary to:

- ensure the care, safety and welfare of staff and students;
- manage relationships between members of the School community (including staff, students, Parents and alumni); and
- to protect the School's lawful interests in a legal or disciplinary proceeding.

The School will exercise discretion and will not:

- disclose CCTV footage to Parents unless compelled by the relevant laws; and
- use or disclose records of private conversations or activities in situations where it is reasonably evident that the parties did not intend for the conversation or activity to be heard or observed by others.

6.2. Cookies and Analytics

The School may also collect data from its website using various technologies, including 'cookies'. A 'cookie' is a text file our website transmits to an individual's browser which is stored on the individual's computer as an anonymous tag identifying the individual's computer (but not the individual) to us. The browser may be configured to disable cookies, but some parts of our website may not function properly (or at all) if cookies are disabled.

7. HOW DO WE USE AND DISCLOSE THE PERSONAL INFORMATION WE COLLECT

As a general principle, and in accordance with our statutory obligations, we only use and disclose personal information for:

- the primary purpose for which the information was collected;
- a secondary purpose that is related to the primary purpose and for which you would reasonably expect us to use the collected information; or
- as otherwise permitted or authorised by law, including the APPs.

We will take reasonable steps to make individuals aware of the purpose for which the information collected may be used or disclosed, including by reference to this Privacy Policy.

In particular, we may disclose personal information to the following people, where appropriate:

- related entities such as the School and Foundation;
- people providing educational, support and health services to the School (either on or off campus) including specialist visiting teachers, sports coaches, volunteers and counsellors;
- third party service providers who provide online educational and assessment support services, document and data management services, training and support services, migration, administration, financial or educational services to the School;
- an approved schooling authority who manages the School's responsibilities under the Australian Education Regulation 2023 and the Australian Education Act 2013 (Cth) relating to students with a disability;
- assessment and educational authorities, including the NSW Education Standards Authority (NESA), Queensland Curriculum and Assessment Authority, 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);
- another school or staff at another school;
- government departments (both state and federal such as the Department of Home Affairs);
- insurance providers for Overseas Student Health Cover (OHSC) such as Allianz Care;
- medical practitioners such as GPs and Hospitals as needed;
- homestay providers;
- recipients of the School's publications, such as newsletters and magazines;
- students' or Parents and their emergency contacts;
- for the purposes of a Workers Compensation insurance claim to facilitate a return to work;
- third parties to whom you authorise us to disclose personal information;

- where authorised or required by law or court order, or other governmental order or process, such as where we believe in good faith that the law compels us to disclose information in order to:
 - lessen or prevent a serious threat to your life, health or safety or public health or safety, where it is impractical to obtain your consent;
 - take appropriate action in relation to suspected unlawful activity or serious misconduct;
 - to locate a person reported as missing;
 - to assert a legal or equitable claim; or
 - to conduct an alternative dispute resolution process; and
- where we are required to do so as a result of any obligations we owe under a contract.
- Anyone to whom we are required or authorised to disclose the information to by law, including child protection laws which include the Children and Young Persons (Care and Protection) Act 1998 (NSW), the Child Information Sharing Scheme (CISS) and the Family Violence Information Sharing Scheme (FVIS).

7.1. Student Images and Videos

From time to time, the School may collect photographs and videos of students, including footage from the School's CCTV cameras. These photographs and videos may be displayed from time to time around the School and published in the School's publications. However, student images will only be used in school-related media and will not be sent to third-parties (other than service providers) such as external media outlets without the express permission of the Parents. No student image linked with the student's name will be included in any marketing or promotional material, including on the School's website or social media accounts, without prior written consent.

Consent to the use of student images will be obtained from Parents at enrolment, and during the course of enrolment. Once granted, consent stands until such time it is changed during the School's consent renewal process, or expressly withdrawn in writing at other times. Due to complex challenges in managing the recording of any student images (e.g. at events), the School cannot accept partial consent and therefore consent will be treated as unequivocal. Any withdrawal of consent may affect a student's participation in certain School activities and will take effect from the time of withdrawal, and will not apply to any pre-existing collection, use or disclosure of a student's image or video.

Members of the School community acknowledge that even when authorisation is withheld then incidental, internal or unintentional use of images and recordings featuring that member (or a member's child) may still occur from time to time (particularly when a parent or child attends a photographed or recorded school-related activity or event).

Where reasonably practicable, the School will communicate prior to school-related activities or events about whether there will be any photography, live streaming or recording of the event.

7.2. Third-party service providers

When Lindisfarne engages third parties to provide products and/or services to the School or the Foundation, such as IT service providers and payment processors, such third parties may have access to personal information that Lindisfarne holds about individuals. Lindisfarne does not authorise those third parties to use any personal

information disclosed to or accessed by the third party for any purpose other than to facilitate the third party's completion of its obligations owed to the Lindisfarne.

8. DISCLOSURE OF PERSONAL INFORMATION OVERSEAS

The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or hosting of an international student. However, the School will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual or their Parents (in some cases this consent will be implied); and
- otherwise complying with the APPs or other applicable privacy legislation.

The School may use online or 'cloud' service providers to store or back-up 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. 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 the cloud service provider's servers, which are usually situated in data centres within Australia. However, in some cases it may be necessary for personal information to be stored in data centres located overseas. In those circumstances, we will take reasonable steps to ensure the service provider complies with Australian privacy laws or is subject to an overseas scheme that protects personal information in a similar way.

From time to time, domestic and international students may attend an overseas excursion as part of their curriculum at the School, which requires disclosure of information to overseas medical practitioners. The School may also employ a third party for the purposes of supporting international student recruitment.

Lindisfarne does not otherwise disclose or allow a third party located outside Australia to access the personal information that Lindisfarne holds.

8.1. Direct marketing

Marketing and seeking donations for the future growth and development of the School is an important part of ensuring that the School continues to provide a quality learning environment in which both students and staff thrive.

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising communications from the School or the Foundation. The School may also disclose your contact details to organisations that assist in the School's fundraising, for example, the alumni organisation or, on occasions, external fundraising organisations.

9. SECURITY AND RETENTION OF PERSONAL INFORMATION

Lindisfarne takes the security seriously and takes reasonable steps to protect any personal information it holds from misuse, interference and loss. This includes:

- physical security measures such as locking cabinets and restricting access to employees in the School premises; and
- technology security measures such as restricting access, employing passwords and multi-factor authentication measures to protect electronic records.

Lindisfarne's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of all individuals who interact with the School.

10. ACCESSING THE PERSONAL INFORMATION WE HOLD

An individual is entitled to access the personal information we hold about that individual. All enquiries should be directed to the School's Director of Human Resources or Deputy Principal (see below).

We will respond to such requests within a reasonable period of time. We are entitled under the APPs to charge a reasonable fee to cover the costs we incur in providing access but this is usually not required.

We reserve the right to refuse access where an exception applies, for example, where releasing the information would unreasonably impact the privacy of another individual. Alternatively, we reserve the right to redact the information made available, to protect the privacy of other individuals. We also reserve the right to verify the identity of the person requesting the information and their entitlement to access it.

11. CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

The School respects every Parent's right to make decisions concerning their child's education. Generally, the School will refer any requests 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.

Parents may seek access to personal information held by the School about them or their child by contacting the School's Director of Staffing or Deputy Principal (see below). However, there may 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 the School's duty of care to the student.

The School may, at its discretion, on the request of a 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 normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

12. QUALITY OF THE PERSONAL INFORMATION WE HOLD

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy, completeness and currency of the information we hold largely depends on the accuracy of the information

supplied to us or which we collect.

If at any time you discover that any information held about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you can request correction of the information by contacting the School's Director of Human Resources or Deputy Principal (see below). The School reserves the right to verify your identity before processing a correction request.

13. LODGING A COMPLAINT

If you wish to make a complaint to Lindisfarne about how we handle your personal information we ask that you make the complaint in writing to the School's Director of Human Resources or Deputy Principal (see below).

Lindisfarne will promptly acknowledge receipt and will respond to you within a reasonable time period (generally within 30 days). Where the complaint requires a more detailed investigation, the complaint may take longer to resolve, and we will keep you updated as to progress.

We reserve the right to verify the identity of the individual making the complaint and to seek further information from the complainant about the circumstances of the complaint. We also reserve the right to refuse to investigate or to otherwise deal with a complaint where permitted under the Privacy Act. For example, Lindisfarne may refuse to investigate or to otherwise deal with a complaint if the School considers the complaint to be vexatious or frivolous.

If you are not satisfied with our response to your complaint, or you consider that Lindisfarne may have breached the APPs or the Privacy Act, you can make a complaint to the Office of the Australian Information Commissioner ("OAIC").

Office of the Australian Information Commissioner

Postal address: GPO Box 5288 Sydney NSW 2001

Phone: 1300 363 992

Email: foi@oaic.gov.au

Website: www.oaic.gov.au

How to contact us

If you have a query in relation to this Privacy Policy or wish to make a complaint, please contact:

Director of Staffing or Deputy Principal

(07) 5590 5099

principal@lindisfarne.nsw.edu.au

PO Box 996, Banora Point NSW 2486

14. POLICY ADMINISTRATION

This policy will be reviewed periodically, or in the event of any information or incident that indicates the need for a review, or following relevant legislative or organisational change.

HUMA001 Lindisfarne Privacy Policy	
Policy Version	Version 5
Date of Formulation	July 2014
Date of Last Review	Oct 2024
Date of Next Review	Oct 2026
Owner	Stuart Marquardt
Position Held	Principal
Approved by the Principal	