



## 1. Introduction

Girton Grammar School (GGS) is bound by the Australian Privacy Principles contained in the Privacy Act. In relation to health records, GGS is also bound by the Health Privacy Principles which are contained in the Health Records Act.

GGS may, from time to time, review and update this Privacy Policy 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.

## 2. Purpose

This policy sets out the approaches used by GGS in the management of personal information and the steps to be taken to seek to be compliant with the relevant legislation.

## 3. Definitions

Child Information Sharing Scheme (CISS): The CISS was established by the Victorian Government in 2018 and applies to all Victorian schools and early childhood education and care services. The Scheme enables organisations to share confidential information (defined as health and personal information) to promote the wellbeing and safety of children.

personal information about individuals and how it is collected, held, used and disclosed.

- Confidentiality means the passing or holding of information which has been conveyed in confidence, which is not readily available publicly. There is no specific confidentiality legislation in Australia. Confidentiality, and breaches thereof, are beyond the scope of this Policy. Issues pertaining to confidentiality can be raised with any member of the School's Executive Team. Confidentiality and privacy do overlap. In these instances, the Privacy Policy should be applied.

Staff: Staff includes teaching, administration and support staff, permanent and casual staff, contractors, coaches, volunteers, teacher candidates, trainees and work experience students.

## 4. Scope

This policy applies to all members of the school community including staff, students, parents, caregivers, school board members, volunteers, contracted parties and third-party providers.

## 5. Collection of Personal Information

### 5.1 Collection and holding of personal information

The type of information GGS collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- 5.1.1 Students, parents, caregivers and/or guardians.

- Volunteering information.
- Photos and videos at GGS events.
- Job applicants, staff members, volunteers and contractors, including:
  - Name, contact details (including next of kin), date of birth, and religion
  - Information on job application
  - Professional development history
  - Salary and payment information, including superannuation details
  - Medical information (e.g. details of disability and/or allergies, and medical certificates)
  - Complaint records and investigation reports
  - Leave details.

Workplace surveillance information; work emails and private emails (when using work email address) and Internet browsing history.

Other people who come into contact with GGS, including name and contact details and any other information necessary for the particular contact with GGS.

It is the policy of GGS to remain compliant with Australian Privacy Principles at all times.

At times, GGS may collect additional information in order to reduce specific risks that arise.

The information referred to above may include sensitive personal information. Sensitive personal information will only be collected where it is necessary to do so and will be used, held and disclosed in the circumstances referred to above where:

- Consent has been provided (which may be implied in certain circumstances), or
- Such use, holding and disclosure is reasonably to be expected or is necessary to enable the School to satisfy its legal obligations or is otherwise permitted by law.

## 5.2 How GGS collects personal information

GGS collects personal information in ways that include (but are not limited to) information obtained:

- 5.2.1 In the course of the enrolment process.
- 5.2.2 From face-to-face meetings.
- 5.2.3 Over the telephone and internet (including email).
- 5.2.4 During the school year by way of forms filled out electronically or manually by parents and/or guardians and students.
- 5.2.5 Through the School's intranet portal.
- 5.2.6 From third persons such as medical practitioners and health professionals, lawyers and other legal personnel.
- 5.2.7

5.2.10 Incidentally in the operating of the school.

### 5.3 Personal information derived from students

There may be occasions when GGS collects personal information about students directly from them, such as when a student attends a school counsellor, teacher, or pastoral care provider.

## 6. Use of Personal Information

GGS

- 6.2.3 Administering the individual's employment or contract, as the case may be.
- 6.2.4 Providing a reference.
- 6.2.5 Assisting with the administration of GGS operations.
- 6.2.6 Enabling GGS to comply with its legal obligations

- Anyone you authorise GGS to disclose information to.
- Anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

7.1 Child Information Sharing Scheme and Family Violence Information Sharing Scheme  
The Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS) apply to all Victorian schools.

GGS will request access to and disclose confidential information with other information sharing entities (ISEs), providing it meets the threshold requirements.

All of the threshold requirements must be met before sharing confidential information. These include:

- 7.1.1 The purpose of sharing information is to promote the wellbeing and safety of a child.
- 7.1.2 The information may assist the organisation to make a decision, assessment or plan, conduct an investigation, provide a service or manage any risk in relation to a child.
- 7.1.3 T

purpose. School personnel may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.

#### 7.5 Exception in relation to employee records

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record.

The exemption applies if GGS act or practice is directly related to:

- 7.4.1 Either a current or former employment relationship between the employer and the individual; or
- 7.4.2 An employee record held by the organisation relating to the individual.

## 8. Sensitive Information

In referring to 'sensitive information', GGS means:

- Racial or ethnic origin
- Political opinions
- Religion
- Trade union or other professional or trade association membership

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or to update any personal information GGS holds about you or your child, please contact the Principal by telephone or in writing. GGS may require you to verify your identity and specify what information you require. GGS 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, GGS 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.

## 11. Consent

GGS respects every parent's right to make decisions concerning their child's education.

Generally, GGS will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. GGS 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 GGS about them or their child by contacting the Principal by telephone or in writing. However, there may be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable





Review Timeline:	Every three years (2025)
Master document location:	Astra

Version number	Date	Description
1	January 2020	Document created & Published
2	January 2022	Amended
3	June 2024	Reviewed & Updated

Audience	Publication location
Girton staff	Astra policies page / Litmos
Girton Community	

## Appendix A

### PROCESS TO FOLLOW WHEN A REQUEST TO SHARE INFORMATION HAS BEEN RECEIVED

- Step 1: Check that the organization seeking the information is an 'Information Sharing Entity' (ISE) referred