



PENLEIGH AND ESSENDON GRAMMAR SCHOOL

## Privacy Policy

Penleigh and Essendon Grammar School ACN 006 038 071 (which, for the purpose of this Privacy Policy includes any of its Related Bodies Corporate, as that term is defined in the *Corporations Act 2001 (Cth)*) (**PEGS, we, us, our**) respects your privacy and is committed to protecting the personal (including sensitive) information that we hold about you.

We are bound by the *Privacy Act 1988 (Cth)* (**Privacy Act**), including the Privacy Amendment (Notifiable Data Breaches) Act 2017, and must comply with the Australian Privacy Principles (**APPs**). You can find out more information about the Privacy Act and the APPs at the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

This Privacy Policy sets out the manner in which we collect, use, disclose and manage your personal information.

By:

- making an enquiry with or about the school, including as a current or prospective student, parent or guardian;
- being registered, or registering your son or daughter or other child under your care on a waiting list;
- applying for a scholarship at the school;
- enrolling your child or other child under your care at the school;
- being enrolled as a student of the school;
- visiting our website ([www.pegs.vic.edu.au](http://www.pegs.vic.edu.au));
- arranging online participation in school activities;
- becoming a client or debtor of PEGS;
- supplying goods or services to us;
- entering into an agreement with us; and
- applying for or accepting a job, contract or voluntary role with us,

you are taken to have read, and agree to the collection, use, disclosure and handling of your personal information in accordance with this Privacy Policy.

PEGS collects and holds information about:

- students and parents and/or guardians before, during and after the course of a student's enrolment at PEGS;
- volunteers, contractors and service providers;
- job applicants and employees;

- people who are nominated as emergency contacts; and
- other people who come into contact with the school.

We endeavour to keep your personal information highly secure, and acknowledge that you have the right to be informed about how we deal with that information, so if on reading this policy, you are unclear as to any of the matters or simply want more information, please contact us by using the contact details provided at the end of this Privacy Policy.

### **What personal information we collect about you**

We aim to collect personal information only if it is reasonably necessary to providing the service, product or information you have requested from us.

**Personal information** has the meaning given to that term in the Privacy Act and includes information or an opinion (whether true or not) about an identified individual, or an individual who is reasonably identifiable.

In this Privacy Policy, ‘personal information’ also includes **sensitive information**, which is defined in the Privacy Act to include information or an opinion about an individual’s racial or ethnic origin, religious beliefs or affiliations, sexual orientation or practices, health information, or genetic information that is not otherwise health information.

### **For students, parents and other clients**

In the course of providing you with products and services, PEGS collects personal information in a variety of ways. For example, PEGS may collect personal information about you when you:

- make an enquiry with or about the school, including as a prospective student, parent or guardian;
- are registered, or register your son or daughter or other child under your care on a waiting list;
- apply for a scholarship at the school;
- enrol your child or other child under your care at our school;
- are enrolled as a student of the school;
- visit our website ([www.pegs.vic.edu.au](http://www.pegs.vic.edu.au))
- arrange online participation in school activities
- become a client or debtor of PEGS;
- supply goods or services to us; and
- enter into an agreement with us.

**In general** you can assume that we collect and hold the following personal information about you:

- your name;
- your address;
- your email address;
- your relationship, or potential relationship with PEGS; and
- your telephone number.

You have the option of not identifying yourself or of using a pseudonym when dealing with us but this may restrict the services we are able to provide to you.

If you are a **current or prospective student of PEGS**, we may also collect and hold the following personal information about you:

- age, date of birth and year level,
- relationship with the school, for example, siblings currently or previously enrolled in PEGS;
- Victorian Student Number;
- tax file number (if applicable);
- copy of or details from your birth certificate or passport;
- if you identify as Aboriginal or Torres Strait Islander;
- languages spoken at home;
- emergency contact information;
- academic, social, learning and behavioural information, including information collected from previous schools (if applicable);
- photographs and videos of you;
- your religion;
- medical information, including disabilities, medical conditions, psychological or emotional conditions, as well as the name of your treating medical practitioners, dietary requirements; and
- family circumstances, including marital status of parents and other information in relation to custody, access or intervention orders.

If you are a **current or prospective parent of PEGS**, we may also collect and hold the following personal information about you:

- bank account (including credit card) details;
- tax file number;
- occupation and employer; and
- relationship with the school, for example, if you are a past student of PEGS.

If you are an **applicant for a scholarship** at the school, we will collect your name, address, age, current school, statement of abilities and your test scores. This may include information from Australian Council for Educational Research (**ACER**) or other providers, NAPLAN results and school reports. The school also records information about personal achievements, for instance in the areas of drama, music or sport. Also we collect some of this information from all students entering the school.

If you are a **graduating student**, we may collect and hold information about your activities after school, including your year of graduation, address and contact information, tertiary courses and institutions in which you are enrolled, employment and career aims.

## **How we collect personal information**

Unless it is unreasonable or impracticable to do so, we collect your personal information from you directly, including by using cookies on our Website.

In many cases, however, the information that we collect about students or prospective students is collected from a parent or legal guardian of that student.

In some cases we may collect personal information from third parties such as:

- people other than parents who are related to students such as grandparents or guardians;
- medical and health practitioners such as psychologists, speech therapists, occupational therapists (however we will only collect this information with your or your parent or guardian's consent);
- external examination agencies
- the legal system including courts (for example, in relation to intervention orders or court proceedings);
- credit reporting bodies such as VEDA (please see our Credit Reporting Policy);
- Victorian Curriculum and Assessment Authority (VCAA); and
- Victorian Tertiary Admissions Centre (VTAC).

In relation to enrolling students, PEGS may collect personal information from the student's previous school (including from the student's teacher) to obtain information about the student's academic progress and any other information that may help the student's transition. This information is requested by PEGS and is provided subject to the permission of the parents/guardians and the other school.

In some cases we will be required or authorised by Australian law, or the order of a court or tribunal to collect personal information about you.

In some cases, PEGS may receive unsolicited personal information about you (for example, from a previous school or other provider). When unsolicited information is received, we will assess whether we are permitted by law to collect that information. If not, the information will be destroyed or de-identified.

We will take such steps as are reasonable in the circumstances to notify you that we have collected personal information about you and of any matters relevant to the collection, as soon as practicable after we have collected it, unless it is obvious from the circumstances that you would know or would expect us to have the information.

## **How We Use Cookies**

We may use cookies on some areas of our Website. A cookie is a small file saved on your computer's hard drive. When you return to our website, the data saved in the cookie is sent back to the website. These details would be encrypted. We use cookies to gauge visitor traffic, trends and to help us serve you more efficiently if you revisit the Website. The cookies we use in no way give us access to your computer or any information about you, other than the information you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the Website.

## **Purpose of collection**

We collect personal information about students, parents and guardians primarily to enable the provision of education services for students.

If you are a **student, parent or guardian**, (including a prospective parent, guardian or student) and it is reasonable to expect that we would use or disclose personal information in relation to you, your son or daughter or other child for whom you are responsible for the provision of education services, we may also use or disclose that information to:

- keep parents informed about matters relating to their child's schooling, including the issue of academic reports;
- promote a student's education and social and medical well-being;
- contact you in the case of an emergency involving your son or daughter;
- provide you with goods, services and information that you request from us;
- provide you with information about PEGS' products and services and to promote, advertise and market our products and services;
- develop and improve our services;
- provide you with information about, and administer a scholarship program;
- invite you to events hosted by PEGS and inform you of developments at PEGS and other services that we can provide; and
- assist you with enquiries or complaints.

With reference to associations affiliated with the school like Friends of PEGS, the Former Students' Association and PEGS Business Network, we will use your personal information to keep you connected with the school, including inviting you to events hosted by PEGS and inform you of developments at PEGS and other services that we can provide to you.

Information collected through our Website about visitors to that site may be used by PEGS for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are at our Website.

If you are a student, parent or guardian (past, present or future), we may otherwise collect and use your personal information to comply with any law, including the VRQA regulations for school registration, regulations imposed by the Victorian and Commonwealth Governments from time to time, regulations administered by VCAA from time to time in relation to NAPLAN and VCE, and to comply with any lawful request of a law enforcement agency or government authority.

Where reasonably possible, we will provide you with a choice to opt-out of any of the above. We will disclose any use of personal information for direct marketing purposes and will respect your request to decline to receive these marketing communications, however by doing so, you may miss out on opportunities made available to the school community.

## **Sharing of your personal information**

We may provide your personal or other information collected to external providers of services that we may use to operate the school and manage our school and business systems. These services include file storage service providers, database and mailing service providers, couriers and/or freight service providers, printers, call centers,

providers of payment processing and identity verification services, providers of school facilities and IT technicians who may need access when providing on-site support (although it is our general practice for them to work under supervision).

As a **student or a parent or guardian** of a student at PEGS, we may also disclose your personal or other information to the following third parties:

- Department of Education and Training;
- Australian Children's Education & Care Quality Authority (ACECQUA);
- VCAA, in relation to NAPLAN and VCE, including information for special provision applications;
- VTAC, in relation to Special Entry Access Scheme applications;
- ACER for online testing;
- educational organisations for the purpose of educational research (such as the PISA Survey);
- Department of Health and Human Services (including Child Protection) and Child First;
- third parties who provide training opportunities for students and employment advice;
- the media, in relation to VCE results and other achievements;
- people that have been nominated as emergency contacts;
- co-curricular support staff, including drama, dance and sport;
- overseas tour providers for tours on which students participate;
- online providers of educational and administrative resources and tools including but not limited to Google (through the Google Docs, Gmail and Google Drive products), Auralia, Learning Field, Pixevety, Spydus, Clickview, Schoolbox, Education Perfect, Oxford Online, Passtab, Synergetic, Trybooking and Visualcoaching P/L;
- web builders and managers;
- paramedic and other medical personnel in any situation requiring emergency care; and
- audio-visual providers who are engaged by PEGS, for the purpose of organising and taking school photographs and other products.

We may disclose your personal information to these third parties so that they can assist us with providing the best possible service to you or your son or daughter. In many cases PEGS is required by law to provide information to these organisations. Those companies will be permitted to access only the personal information they need to deliver the service to PEGS or to you. PEGS takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

As a **student or past student**, if you use PEGS as a referee in an application for employment or further education including residential college placing, we will

confirm that you attended PEGS and the years of attendance, your academic record and any other information that is requested in this process.

### **Disclosure of Information**

Where requested, and if required or permitted by law, we may also provide information to Victoria Police and Australian Federal Police and Department of Veteran Affairs.

We will disclose your personal information overseas if you request us to do so, for example, in the case of an international exchange program. If you travel on a school trip, your information may also be disclosed overseas where relevant (usually for medical reasons). In both cases, it should be obvious to which country the information is being disclosed.

We are not otherwise likely to disclose your information to overseas recipients unless it is with your consent, or the disclosure is required or authorised by law. We will only disclose to overseas recipients if we reasonably believe that the recipient is subject to a law or scheme or contractual obligation that will protect your personal information in a way that is substantially similar to the way the APPs protect your personal information, or we have your consent.

The privacy and collection practices of entities to which we disclose personal information are governed by their own privacy policies and collection notices.

We will not otherwise disclose information about you unless the disclosure:

- is required or authorised by law; or
- you have consented to our disclosing the information about you.

### **Quality of your personal information**

We aim to ensure that your personal information is accurate, complete, relevant, up to date and not misleading. To assist us in this, you need to provide true, accurate, current and complete information about yourself to us as requested and properly update the information to keep it true, accurate, current and complete. We will ask you at least annually to review and update the personal information that we hold about you and your children, however we request that you let us know immediately when personal information (particularly sensitive information, including family circumstances) changes.

If you believe that the information we hold is inaccurate or incomplete, please contact us and we will take steps to correct the information.

In the event that we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information claiming that you believe the information is inaccurate, incomplete or out of date.

### **Securing your personal information**

We are committed to maintaining the security and confidentiality of your personal information and we will take reasonable precautions to protect your personal information from unauthorised access, disclosure, use, alteration or loss.

We will take all reasonable steps to guard your information against potential exposure resulting from a data breach that is likely to result in serious harm. We will

notify you if such a data breach is suspected, an assessment will be completed and we will recommend any steps to be taken by you in response.

Confidentiality is regularly discussed with staff, and access to personal information is only shared on a “need to know” basis. In addition, we have the following security measures in place to protect your personal information:

- all data systems are protected by a combination of ICT security measures including permission based password protected access to information and appropriate firewall and other intrusion protection systems;
- our offices and filing cabinets are securely locked;
- in many cases, sensitive information is stored separately from other personal information and access is limited to specific personnel;
- our offices are monitored regularly by a security service;
- our Website and servers are protected by a firewall; and
- our employees agree to the statement on confidentiality as published on the Website when they begin employment at PEGS and this agreement is ongoing. Action is also taken to maintain appropriate protection of personal information associated with use of ICT and social media by employees.

We will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed. In the case of student files however, in many cases this information may be securely archived indefinitely.

**Additional information for staff members, job applicants, contractors and volunteers.**

We aim to collect personal information only if it is reasonably necessary to your work performance and we acknowledge your right to keep certain information to yourself.

**Collection of information**

In general employees can assume that we collect and hold the following personal information:

- your name;
- your address;
- your email address;
- your telephone number;
- your qualifications;
- your skills;
- your approval for working with children;
- records of a Police check where applicable;
- the terms of your employment;
- details of banking, taxation and superannuation related to payment of your salary;
- details of your performance, your conduct relating to work, and your capacity to perform duties.

The school has rights and obligations to collect information about your capacity to perform duties.

- During the course of a job application we may collect information from prior employees and educational institutions.



- During the course of your employment information may be collected by monitoring your work practices. Monitoring will always occur fairly, respectfully and lawfully and only after you have been told that it will occur. Information collected in this manner will be used for legitimate purposes only.

As an employee, if you use PEGS as a referee in an application for employment or further education, we will confirm your record of service and provide any other information that is requested in this process.

### **Maintaining the privacy of others**

Personal information about students, their parents, members of staff, job applicants, contractors and volunteers should never be shared inappropriately. You must ensure that in all communications, including via electronic and social media, your conduct does not breach privacy expectations and is not offensive, derogatory or damaging to the school or individuals. This includes statements shared on social media outside the workplace and on personal devices as well as at work.

### **Changes to this Privacy Policy**

PEGS reserves the right to make amendments to this Privacy Policy at any time for any reason. We will publish any updated Privacy Policy on our Website.

### **Accessing and correcting your personal information**

You have a right to request access to, or the correction of, personal information that we hold about you, or your son or daughter, or other child under your care, subject to exceptions allowed by law. If you would like to do so, please let us know. You may be required to put your request in writing for security reasons.

We will give you access to, or correct, your personal information unless there is a lawful reason for refusing your request for access or correction. If we refuse your request we will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

If you make a request for access to personal information about a student and you are not that student's parent or legal guardian, we will require the consent of the student or their parent or legal guardian before providing you with access to that information.

### **Change in control of PEGS**

If we sell or otherwise transfer part or the whole of PEGS or our assets to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your personal information that is collected by PEGS may be disclosed to a third party, prospective buyer, transferee or insolvency practitioner and that this is reasonable to enable that party to continue or manage the business.

### **Complaints**

If you have a complaint about our collection, use or disclosure of your personal information, or you wish to make a complaint about a breach of the APPs, please contact our Privacy Officer at the details set out below.

In your complaint, please set out the details of your complaint and your contact details. Our Privacy Officer will contact you to acknowledge your request and ask for any

other applicable information. Our Privacy Officer will then investigate the issue and advise you in writing of the outcome.

You can also make a complaint to the Office of the Australian Information Commissioner (or any statutory successor). Further information is available at [www.oaic.gov.au](http://www.oaic.gov.au).

### **Contacting us**

PEGS welcomes your comments regarding this Privacy Policy. If you have any questions about this Privacy Policy and would like further information, please contact us by any of the following means.

Post:  
Privacy Officer  
Penleigh and Essendon Grammar School  
PO Box 417  
Niddrie VIC 3042

Email:  
[nina.bilewicz@pegs.vic.edu.au](mailto:nina.bilewicz@pegs.vic.edu.au)

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To be reviewed: August 2020*