






## BLACKFRIARS PRIORY SCHOOL

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# Privacy Policy

## Policy Statement

Blackfriars Priory School (Blackfriars) has adopted the [SACCS Privacy Policy](#) in its entirety.

Blackfriars additionally provide the below Privacy Policy which sets out how Blackfriars manages personal information provided to or collected by it.

Blackfriars is bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (Privacy Act). Blackfriars may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Blackfriars' operations and practices and to make sure it remains appropriate to the changing school environment.

## Scope

This policy outlines the circumstances in which personal information, and sensitive information, are obtained, how that information is used and how requests to access and/or change that information is managed. This policy applies to all staff, volunteers and contractors of Blackfriars and its related bodies.

## Definitions

### *What is personal information?*

Personal information is any information or opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

### *What is sensitive information?*

Sensitive information is a subset of personal information that includes information or an opinion about an individual's:

- racial or ethnic origin; or
- political opinions; or
- membership of a political association; or

- religious beliefs or affiliations; or
- philosophical beliefs; or
- membership of a professional or trade association; or
- membership of a trade union; or
- sexual preferences or practices; or
- criminal record; or
- health information about an individual; or
- genetic information about an individual that is not otherwise health information.

Subject to some exceptions permitted by law, Blackfriars will obtain consent before collecting, using or disclosing sensitive information about an individual.

*What kinds of personal information does Blackfriars collect and how does Blackfriars collect it?*

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

- students (including former students) and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at Blackfriars; and
- job applicants, staff members, volunteers and contractors.

Personal Information you provide: Blackfriars will generally collect personal information held about an individual by way of documents or forms filled out by Parents, students or other individuals, face-to-face meetings and interviews, emails, letters and other forms of correspondence, websites, telephone calls and through financial transactions. Personal information collected by Blackfriars also includes contact details that are provided by parents, students and former students when they update their records, register for an event or subscribe to a service.

Personal Information provided by other people: In some circumstances, Blackfriars 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 or a referee for prospective employees.

Unsolicited information: Blackfriars may be provided with personal information without having sought it through normal means of collection, such as a result of misdirected post or emails, employment applications received that are not in response to an advertised vacancy or additional information provided which was not requested.

Unsolicited information obtained by Blackfriars will only be held, used and or disclosed if it is considered as personal information that could have been collected by normal means. Otherwise, such information will be destroyed, permanently deleted or de-identified to the extent lawfully and reasonably appropriate.

Exception in relation to employee records: Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to Blackfriars' treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Blackfriars and employee.

*How will the school use the personal information you provide?*

Blackfriars 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.

Students and Parents: In relation to personal information of students and Parents, Blackfriars' primary purpose of collection is to enable Blackfriars to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of Blackfriars. This includes satisfying the needs of Parents, the needs of the student and the needs of Blackfriars throughout the whole period the student is enrolled at Blackfriars.

The purposes for which Blackfriars uses personal information of students and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of Blackfriars;
- administering, processing and/or managing student application(s) and achievement(s) for awards, competitions, scholarship (whether such award or scholarship is provided by Blackfriars or any third party) and/or financial assistance, grants or bursaries, and if successful, administering and/or managing the student awards, scholarships and/or financial assistance, grants or bursaries;
- looking after students' educational, social and medical wellbeing;
- informing Blackfriars' Community of student academic, sport and co-curricular achievements;
- seeking donations and other fundraising activities and marketing for Blackfriars; and
- to satisfy Blackfriars' legal obligations and allow Blackfriars to discharge its duty of care.

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

Job applicants and contractors: In relation to personal information of job applicants and contractors, Blackfriars' primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be.

The purposes for which Blackfriars uses personal information of job applicants and contractors include:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and other fundraising activities, and marketing for Blackfriars; and
- satisfying Blackfriars' legal obligations; for example, in relation to child protection legislation.

**Volunteers:** Blackfriars also obtains personal information about volunteers who assist Blackfriars in its functions or conduct associated activities, such as the Blackfriars Old Scholars events and functions, to enable Blackfriars and the volunteers to work together.

**Marketing and fundraising:** Blackfriars treats marketing and seeking donations and conducting other fundraising activities for the future growth and development of Blackfriars, as an important part of ensuring that Blackfriars continues to provide a quality learning environment in which both students and staff thrive.

Personal information held by Blackfriars may be disclosed to organisations that assist in the Blackfriars' marketing and fundraising, for example, Blackfriars Old Scholars or, on occasions, external marketing and fundraising organisations.

Parents, staff, contractors and other members of the wider Blackfriars' community may from time to time receive fundraising information. Blackfriars' publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

**Sensitive information:** Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, save for the following exceptions: (1) you agree to the information being used for a different purpose; or (2) the use or disclosure of the sensitive information is required or permitted by law.

*Who might Blackfriars disclose personal information to and store your information with?*

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

- other schools and teachers at those schools;
- government departments;
- medical practitioners;
- people providing educational, support and health services to Blackfriars, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority;

- people providing administrative, marketing, fundraising and financial services to Blackfriars;
- recipients of Blackfriars publications, such as newsletters and magazines;
- students' Parents;
- anyone you authorise Blackfriars to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Sending and storing information overseas: Blackfriars may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Blackfriars 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);
- being reasonably satisfied that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Blackfriars may use online or 'cloud' service providers to store personal information and to provide services to Blackfriars 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.

### **Management and security of personal information**

Blackfriars' staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

The Australian Privacy Principles require Blackfriars not to store personal information longer than necessary.

Blackfriars has in place steps to protect the personal information Blackfriars holds from misuse, interference and loss, computerised access, modification or disclosure, by use of various methods including locked storage of paper records and password access rights to computerised records.

### *Updating, access and correction of personal information*

Blackfriars endeavours to ensure that the personal information it holds is accurate, complete and up to date. Parents and students are asked to inform Blackfriars of any changes to their personal information (including student health information). Under the Privacy Act, an individual has the right to seek and obtain access to any personal information which Blackfriars holds about them

and to advise Blackfriars of any perceived inaccuracy. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

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 Blackfriars holds about you or your child, please contact Blackfriars' by telephone on 8169 3900 or [email: admin@bps.sa.edu.au](mailto:admin@bps.sa.edu.au)

Blackfriars may require you to verify your identity and specify what information you require. Blackfriars 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, Blackfriars 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.

#### *Consent and rights of access to the personal information of students*

- Blackfriars respects every Parent's right to make decisions concerning their child's education.

Generally, Blackfriars will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. Blackfriars 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.

However, around the time of graduation of a student from Blackfriars, Blackfriars may seek the consent of a student in relation to their personal information directly so that Blackfriars may maintain contact with that student, including for the purposes referred to in this policy.

Parents may seek access to personal information held by Blackfriars about them or their child by contacting the Privacy Officer 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 impact on the privacy of others, or where the release may result in a breach of Blackfriars' duty of care to the student.

Blackfriars may, at its discretion and on the request of a student grant that student access to information held by Blackfriars 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 have any concerns or would like further information about the way Blackfriars manages the personal information it holds, or wish to make any complaint or enquiry about Blackfriars' compliance with the Australian Privacy Principles, please contact Blackfriars' by telephone on 8169 3900 or [email: admin@bps.sa.edu.au](mailto:admin@bps.sa.edu.au)

Blackfriars will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is reasonably practicable after it has been made. In order to properly investigate the complaint, Blackfriars may seek further information from you.

If you are not satisfied with the decision of Blackfriars you may refer the complaint to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, [www.oaic.gov.au](http://www.oaic.gov.au).

## **Policy implementation**

Responsibility for implementation, monitoring and review of the policy and procedures is vested at the level of the following roles:

- Principal
- Deputy Principal

## **Policy review**

- Frequency: Every 2 years
- Next review date: June 2025

## **Approval authority / Policy owner**

Blackfriars Priory School