PRIVACY POLICY

Purpose

This Privacy Policy sets out how RedGum – The Waldorf School of Central Victoria (RedGum or the School) manages personal information and your rights in relation to your personal information, including how to complain and how we deal with complaints.

The School is bound by 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 Health Privacy Principles which are contained in the Health Records Act 2001 (Vic)

Under the Privacy Act, the Australian Privacy Principles do not apply to certain treatment of an employee record. As a result, this Privacy Policy does not apply to the School's treatment of an employee record held by the School, where the treatment is directly related to a current or former employment relationship between the School and the employee. The School handles staff health records in accordance with the Health Privacy Principles in the Health Records Act.

The School 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. The current version of this Privacy Policy is published on our website.

Kinds of personal information we collect

The types of information the School collects includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the School, including:
    - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
    - parents' education, occupation, language spoken at home, nationality and country of birth;
    - student health information (e.g., details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports and names of doctors);
    - results of student assignments, tests and examinations;

    - student conduct and complaint records, or other behaviour notes, and school reports;
    - information about referrals to government welfare agencies;
    - student counselling reports;
    - health fund details and Medicare number;
    - any Family Court orders;
    - criminal records;
    - volunteering information; and
    - photos and videos at School events;
- job applicants, 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;
    - health information (e.g., details of disability and/or allergies, and medical certificates);
    - complaint records and investigation reports;
    - leave details;
    - photos and videos at School events;
    - workplace surveillance information; and
    - work emails and private emails (when using work email address) and Internet browsing history; and
- other people who come into contact with the School, including name and contact details and any other information necessary for the particular contact with the School.

How we collect personal information

Personal information you provide: The School generally collects personal information about an individual directly from the individual (or their Parent in the case of students). This includes by way of forms, face-to-face meetings and interviews, emails and telephone calls.

Personal information provided by other people: In some circumstances the School may be provided with personal information about an individual from a third party, for example a report provided by a medical professional, a reference from another school or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

Personal information from other sources: We may also collect personal information through activities such as CCTV security cameras if they were to be installed and student email monitoring.

Purposes for which we collect, use and disclose personal information

The purposes for which the School collects, uses and discloses personal information depend on our relationship with you and include the following:

Students and Parents:

- providing schooling and school activities;
- satisfying the needs of Parents, the needs of students and the needs of the School throughout the whole period a student is enrolled at the School;
- making required reports to government authorities;
- keeping Parents informed about matters related to their child's schooling, through correspondence, apps, newsletters and magazines;
- day-to-day administration of the School;
- looking after students' educational, social and health wellbeing;
- seeking donations for the School (see the 'Fundraising' section of this Privacy Policy);
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

Volunteers:

- to contact you about, and administer, the volunteer position;
- for insurance purposes; and
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

Job applicants and contractors:

- assessing and (if successful) engaging the applicant or contractor;
- administering the individual's employment or contract;
- seeking donations for the School (see the 'Fundraising' section of this Privacy Policy);]
- for insurance purposes; and
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

Who we disclose personal information to

The School may disclose personal information, including sensitive information, for educational, care and administrative purposes, and to seek support and advice. This may include to:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
- government departments (including for policy and funding purposes);

- medical practitioners;
- people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
- organisations that assist us with fundraising (see the 'Fundraising' section of this Privacy Policy);
- providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection, students with additional needs and for the purpose of administering Google Apps for Education and ensuring its proper use (see further the section below 'Sending and storing information overseas);
- providers of learning and assessment tools;
- assessment and educational authorities, including 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);
- agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;
- people providing administrative and financial services to the School;
- the provider of our information management and storage system and other information technology services;
- recipients of School publications, such as newsletters and magazines;
- students' parents or guardians;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

How we store personal information

We store your personal information in hard copy and electronically. We use information management and storage systems provided by third party service providers. Personal information is stored with and accessible by the third party service providers for the purpose of providing services to the School in connection with the systems.

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. See further the section below 'Sending and storing information overseas.'

Sending and storing information overseas

The School may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate a school exchange.

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. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services and provide technical support. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Microsoft 365. Microsoft 365 provides Microsoft Outlook, and stores and processes limited personal information for this 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 Microsoft 365 and ensuring its proper use.

Fundraising

The School treats seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to provide a quality learning environment in which both students and staff thrive. Your personal information may be used to make an appeal to you. If you do not want to receive fundraising communications from us, please contact the Principal.

Security of personal information

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

These steps include:

- Restricting access to information on the School databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.

- Implementing human recourses policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Access and correction of personal information

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to seek access to, and/or correction of, any personal information which the School holds about them. 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, update or correct any personal information the School holds about you or your child, please contact the School Principal by email (principal@redgum.vic.edu.au) or telephone (+61) 03 5479 2000. The School may require you to verify your identity and specify what information you require. The School may charge a reasonable fee for giving access to your personal information (but will not charge for the making of the request or to correct your personal information). If the information sought is extensive, the School will advise the likely cost in advance. If we decide to refuse your request, we will provide you with written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.

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. Generally, 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 Principal] by telephone or in writing (details in the section above 'Access and correction of personal information'). However, there may be occasions when access is denied. Such occasions may include (but are not limited to) where the student has the capacity to consent and the School is not permitted to disclose the information to the Parent without the student's consent (note that this is generally taken to be at or from the age of 15), 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.

Enquiries and complaints

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles or the Health Privacy Principles please contact the School Principal by email (principal@redgum.vic.edu.au or telephone (+61) 03 5479 2000. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

Document Control

Document ID	RedGum Privacy Policy
Owner/Approver:	N. Johnson
Author:	N. Johnson
Effective Date:	August 2023
Revision Due Date:	August 2025

Version History

Version	Effective Date	Description of changes from previous version	Authors
0.1	August 2023	Draft	N. Johnson
1.0	13 August 2023	Adopted by board with minor word amendments	N. Johnson
1.1	17 January 2025	Standard formatting applied Document and Version control added	H. Ashwell
1.2	January 2026	New name and logo	H Ashwell