SOUTH EAST BRISBANE STEINER SCHOOL

Privacy Policy

Purpose:	South East Brisbane Steiner School (SEBSS or the school) is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the school and describes how the school uses and manages personal information provided to or collected by it.		
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the school site; and describes the type of information the school collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.		
References:	● Australian Privacy Principles ● *Privacy Act 1988* (Cth) ● SEBSS Record Retention Policy/Schedule ● SEBSS Child Protection Policy		
Status:	Approved	**Supersedes:**	Privacy Policy
Authorised by:	SEBSS Board	**Date of Authorisation:**	23 October 2025
Review Date:	Annually, or as appropriate, to reflect changing legislation and environment.	**Next Review Date:**	October 2026
Policy Owner:	SEBSS Board		

Exception in Relation to Employee Records:

Under the *Privacy Act 1988* (Cth) (Privacy Act), as amended, the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to SEBSS's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between SEBSS and employee.

Definitions

In this Privacy Policy, we observe the definitions as provided by the *Privacy Act*.

Personal information means information or opinion that is provided or recorded in any form and, whether true or not, about an individual whose identity is apparent, or can reasonably be determined from the information or opinion. For example, this includes all paper and electronic records, photographic and video recordings.

Sensitive information is defined as information relating to a person's racial or ethnic origin, political opinions, religion, trade union, or other professional, or trade association membership, sexual preferences, biometric information or criminal record that is also classified as personal information about an individual.

Health Information is defined as including information or opinion about a person's physical, mental or psychological health, or disability, which is also classified as personal information. This includes information or opinion about a person's health status and medical history, whether recorded or not.

Use means to handle or conduct an activity with personal information within the organisation's control.

Disclose means to share personal information with another person or organisation outside the entity that originally collected the information.

In this policy personal information refers to personal information, sensitive information and health information collectively unless otherwise specified.

Policy

SEBSS is committed to managing personal information as per the requirements of the *Privacy Act 1988* (the Act), including the Australian Privacy Principles.

What personal information is collected

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

- students and parents and/or guardians before, during and after the course of a student's enrolment at the school:
    - 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
    - Health information (e.g. details of disability and/or allergies, absence notes, medical reports, immunisation details, and names of doctors)
    - conduct and complaint records, or other behaviour notes, and school reports
    - information about referrals to government welfare agencies
    - counselling reports
    - health fund details and Medicare number
    - any court orders
    - volunteering information
    - photos and videos at school events
- job applicants, staff members, volunteers and contractors:
    - 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
    - photos and videos at school events
    - workplace surveillance information
    - work emails and private emails (when using work email address) and Internet browsing history.
- 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 personal information is collected

Personal information provided by students and families

SEBSS will generally collect personal information held about an individual by way of forms completed by parents/carers or students, face-to-face meetings and interviews, photos and video recordings, observations, emails and telephone calls.

Personal information provided by other people

In some circumstances SEBSS may be provided with personal information about an individual from a third party, for example a report provided by a medical professional, or a transfer note from another school.

How personal information is used

SEBSS will use personal information it collects for the primary purpose of collection. Personal information may also be used for a secondary purpose that is related to the primary purpose of collection, where this would be reasonably expected or has been consented to.

Students and Parents/Carers

In relation to personal information of students and parents/carers, SEBSS's primary purpose of collection is to enable the provision of schooling to enrolled students; fulfil the school's legal obligations including duty of care; and perform administrative activities. This includes satisfying the needs of students, parents/carers, and SEBSS, throughout the whole period a student is enrolled at the school.

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

Personal information such as academic and sporting achievements, student activity details and similar news, including photographs and videos, may be published in school newsletters and magazines, or the school website, or for marketing purposes (see Marketing below).

SEBSS will obtain permission from the student's parent and/or guardian (and from the student if appropriate) to include photographs or videos or other identifying information in promotional material or otherwise make publicly available.

Job applicants and potential contractors

In relation to personal information of job applicants and potential contractors, SEBSS's primary purpose of collection is to assess and (if successful) to engage with the applicant or contractor.

The purposes for which SEBSS uses personal information of job applicants and potential contractors, includes:

- administration of the individual's employment or contract
- insurance
- to satisfy the school's legal obligations e.g., in relation to child protection legislation.

Volunteers

SEBSS collects personal information about volunteers who assist the school's functions or conduct associated activities, such as alumni associations. The purposes for which SEBSS uses personal information of volunteers, includes:

- to contact the volunteer, and administer, the volunteer position
- for insurance purposes
- to satisfy the school's legal obligations, e.g., in relation to child protection legislation.

Fundraising

SEBSS may collect personal information from parents, staff, alumni, contractors and members of the school when seeking donations or undertaking fundraising activities.

Personal information held by SEBSS may be disclosed to organisations that assist in the school's fundraising.

Marketing

SEBSS may use or disclose the personal information that it holds about an individual, including students, staff, parents, volunteers, alumni and other members of the school community, for the purpose of direct marketing, with the consent of the relevant parties.

Personal information in this context may include photographs and videos featured in school publications, such as newsletters, magazines, online and social media, and other marketing collateral.

When SEBSS collects personal information from a third party, this information will only be used for the purposes of direct marketing, with the consent of the relevant parties. In this case, SEBSS will provide an opt-out option.

Disclosure and Storage of Personal Information

SEBSS may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes.

This may include:

- another school or staff at another school
- 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, counsellors and providers of learning and assessment tools
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA), the Queensland Curriculum and Assessment Authority (QCAA), and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- people providing administrative and financial services to SEBSS
- recipients of School publications, such as newsletters and magazines
- students' parents/carers or guardians
- anyone parents/carers authorise SEBSS to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws

Disclosure and Storage of personal information overseas

SEBSS may disclose your personal information to overseas recipients in the course of providing services. Under the Privacy Act, SEBSS is required to take reasonable steps to ensure that any overseas recipient does not breach the Australian Privacy Principles (APPs).

In some cases, the Australian Government may designate certain countries or international frameworks as having substantially similar privacy protections to those in Australia. If a recipient is located in a country that has been officially whitelisted by the Minister, SEBSS may rely on that designation to satisfy our obligations under the Privacy Act.

As of the date of this policy, no countries have been formally whitelisted. Therefore, SEBSS continues to assess and ensures that any overseas recipient handles personal information in accordance with the APPs.

SEBSS may use online or 'cloud' service providers to store personal information and to provide services to SEBSS that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Personal information may be disclosed, when necessary, to these service providers to enable authentication of users that access their services. This personal information may be stored in the 'cloud' which means it may reside on a cloud service provider's server, which may be situated outside Australia.

SEBSS uses centralised information management and storage systems (Systems) provided by third party service providers. Personal information is disclosed and stored with third party service providers for the purpose of providing services to the school in connection with the Systems.

Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. School personnel and the AIS and its service providers 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.

The data centres where the personal information is likely to be kept are located in the USA, Taiwan, Singapore, Ireland, Netherlands and Belgium.

Management and Security of personal information

SEBSS's staff are required to respect the confidentiality of students' and parent/carers' personal information and the privacy of individuals. SEBSS has in place steps, including technical and organisational measures, to protect the personal information held, from misuse, interference and loss; unauthorised access; and modification or disclosure by use of various methods, including locked storage of paper records, and password access rights to computerised records.

Data Breaches

SEBSS will deem an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of personal information, or a loss of personal information, held by the school
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

Eligible data breach assessment/investigation

If SEBSS suspects that an eligible data breach has occurred, it will take reasonable steps to assess/investigate within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then SEBSS will be required to lodge a statement to the Privacy Commissioner (Commissioner). Where practical to do so, the school will also notify the affected individuals. If it is not practicable to notify the affected individuals, SEBSS will publish a copy of the statement on its website or publicise it in another manner.

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

Access and Correction of Personal Information

Under the Privacy Act, an individual has the right to seek and obtain access to any personal information which SEBSS holds about them and to advise of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents/carers, but older students may seek access and correction themselves.

To make a request to access or to update any personal information SEBSS holds, please contact the [School Principal] in writing. SEBSS may require you to verify your identity and specify what information you require. A reasonable fee may be charged to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the likely cost will be advised in advance.

If access to that information cannot be provided, written notice explaining the reasons for refusal will be provided.

The school will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

Consent and Rights of Access to the Personal Information of Students

SEBSS respects every parent/carer's right to make decisions concerning their child's education. Generally, any requests for consent and notices in relation to the personal information of a student will be referred to the student's parents/carers. SEBSS will treat consent given by parents/carers as consent given on behalf of the student and notice to parents/carers will act as notice given to the student.

As mentioned above, parents/carers may seek access to personal information held about them or their child by contacting the [School Principal] by telephone or in writing. However, there will be occasions when access is denied. Such occasions may include (but are not limited to):

- where release of the information would have an unreasonable impact on the privacy of others

- where the school believes the student has capacity to consent and the school is not permitted to disclose the information to the parent/carer without the student's consent
- where the release may result in a breach of the school's duty of care to a student.

The school may, at its discretion, on the request of a student, grant that student access to information held by SEBSS about them or allow a student to give or withhold consent to the use of their personal information, independently of their parents/carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Enquiries and Complaints

For further information about the way SEBSS manages personal information, please contact the Principal.

To make a complaint about SEBSS's breach of the Australian Privacy Principles refer to SEBSS Complaints Handling Policy.

Further information is available from the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

APPENDIX 1

Standard Collection Notice

How and Why the School Collects Personal Information

1. The School collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the School. This may be in writing or in the course of conversations.
2. The primary purpose of collecting this information is to enable the School to provide schooling to students enrolled at the school, exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School.
3. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
4. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
5. Health information about students is sensitive information within the terms of the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988*. We may ask you to provide medical reports about students from time to time.
6. A student's enrolment may be delayed or prevented if the School cannot collect certain personal information. This is particularly so where the information is relevant to the health and safety of the student, other students and/or staff.
7. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why.

To Whom Does the School Disclose Information

8. The School may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
    - other schools and teachers at those schools;
    - 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;
    - 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);
    - People providing other information technology services to the School (see also para [12] to [13] or [14] below);
    - people providing administrative and financial services to the School;
    - anyone you authorise the School to disclose information to; and
    - anyone to whom the School is required or authorised by law, including child protection laws, to disclose the information.
8. Personal information collected from students is regularly disclosed to their parents or guardians.

9. School activities and news (including student achievements) are frequently published in the School's journals, newsletters and magazines, on our intranet or otherwise shared with the School community (current, future and past students, parents and teachers). This may include personal information (including photographs and videos) of students and parents involved in School activities such as academic and sporting events and achievements, concerts and plays, school camps and school excursions. The School will obtain permissions if we would like to include photographs or views of students (or parents) in our promotional material or otherwise make this material available to the public such as on the internet.
10. The School may include students' and students' parents' contact details in a class list and School directory.

Overseas Storage and/or Disclosure

11. 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. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
12. The School may disclose your personal information to overseas recipients in the course of providing our services. Under the Privacy Act, SEBSS is required to take reasonable steps to ensure that any overseas recipient does not breach the Australian Privacy Principles (APPs). In some cases, the Australian Government may designate certain countries or international frameworks as having substantially similar privacy protections to those in Australia. If a recipient is located in a country that has been officially whitelisted by the Minister, the School may rely on that designation to satisfy our obligations under the Privacy Act. As of the date of this notice, no countries have been formally whitelisted. Therefore, the School continues to assess and ensures that any overseas recipient handles your personal information in accordance with the APPs.

Your Rights and How to Complain

15. The School's Privacy Policy, accessible on the School's website, sets out how parents or students may seek access to and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to a student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
16. The School's Privacy Policy also sets out how parents and students can make a complaint about a breach of the APPs and how the complaint will be handled.

Fundraising

17. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. [It may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose].
18. The School will not disclose your personal information to third parties for their own marketing purposes without your consent.

APPENDIX 2

Employment Collection Notice

1. In applying for this position, you will be providing SEBSS with personal information.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted.
5. 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 email services. 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 reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
6. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

APPENDIX 3

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the School, you will be providing SEBSS with personal information.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for [insert amount of time].
4. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
5. We will not disclose this information to a third party without your consent unless otherwise permitted to.
6. 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. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.