

1. Purpose

Wilderness School is committed to maintaining the privacy of the information it collects.

The purpose of this policy is to outline how Wilderness School (“**School, we or us**”) manages and uses personal information provided to, or collected by, the School. This policy also guides staff as to the standards to be applied in respect of handling personal information and ensures consistency in the Schools approach to privacy matters.

The School is bound by the Australian Privacy Principles (**APPs**) contained in the Commonwealth *Privacy Act 1988* (**Privacy Act**).

Under the Privacy Act, the APPs 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 will, however handle employee records with appropriate discretion and confidentiality.

The School may, from time to time, review and update this 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 educational environment. The current version of this Privacy Policy is published on our website.

2. Scope

This policy applies to all staff, parents, Board members, consultants, members, volunteers, contractors and visitors entering the workplace, and all events and activities conducted by the school, or those attended as representatives of the School, whether on or off site.

3. Implementation

3.1 Types of information collected

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

- students and parents and/or guardians (collectively referred to as “parents” in this Policy) before, during and after the course of a student’s enrolment at the School, which may include:
 - name, contact details (including next of kin), date of birth, gender, language background, previous school, religion
 - parents’ education, occupation and language background, nationality and country of birth
 - health information (e.g. details of disability and/or allergies, dietary requirements, absence notes, immunisation details)
 - medical information (including mental health information and names of doctors)
 - conduct and complaint records, school reports, counselling and behavioural notes
 - information about referrals to government welfare agencies
 - counselling reports
 - health fund details and Medicare number
 - results of assignments, tests and examinations
 - Family Court orders
 - criminal records
 - volunteering information
 - photos and videos at School events (including excursions; camps; trips)

- job applicants, volunteers and contractors which may include:
 - name, contact details (including next of kin), date of birth
 - information on job application
 - professional development history
 - evidence of qualifications and certifications
 - salary and payment information, including superannuation details
 - medical information including health fund details and/or Medicare
 - passport and visa details
 - complaint records and investigation reports
 - leave details
 - photos and videos at School events
 - workplace surveillance information
 - internet browsing history and emails sent/received using work email address
- other people who are involved with the School including name and contact details and any other information necessary for the particular contact with the School.

3.2 How we collect personal information

3.2.1 Personal Information you provide

The School will generally collect personal information held about an individual directly from the individual (or their Parent in the case of students) by paper or on-line forms, face-to-face meetings, emails and telephone calls. On occasions, people other than parents or students provide personal information.

Without this information we may be limited in our ability to fully execute our duty of care, or communicate effectively with nominated parties with urgent or relevant information.

3.2.2 Personal information provided by other people

In some circumstances the School may be provided with personal information about an individual from a third party, such as a report provided by a medical professional or a reference from another school. 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.

3.2.3 Personal information from other sources

We may also collect personal information through the School's security system (such as CCTV security cameras) and computer email monitoring,

3.3 Use of personal information you provide

The School will use personal information it collects for the primary purpose of that collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected or consented to by the provider of the information.

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

3.3.1 Students and Parents

The School's primary purpose of collecting personal information of students and parents is to enable the School to facilitate enrolment, provide schooling to students enrolled at the School, exercise its duty of care, and perform necessary associated administrative tasks, which will enable students to take part in all the activities of the School.

The purposes for which the School uses personal information of students and parents include:

- admissions and enrolment matters
- keeping parents informed about matters related to their child's schooling, through correspondence, newsletters, magazines and other publications
- making required reports to government authorities

- day-to-day administration of the School
- looking after students' educational, social and medical/health wellbeing
- informing the School's community of student academic, sport and co-curricular achievements
- drawing upon the expertise of members of the School community to assist with operations and functions
- seeking donations or financial support for the School
- promotion and marketing of the School
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

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

3.3.2 Job Applicants, Contractors and Volunteers

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

The purposes for which the School uses personal information of job applicants, volunteers and contractors include:

- administering the individual's engagement or contract
- insurance purposes
- seeking donations or financial support for the School
- promotion and marketing of the School
- to satisfy the School's legal obligations, for example, in relation to child protection legislation

The School may also obtain personal information about volunteers or members of groups who assist the School in its functions or conduct associated activities, such as Wilderness Old Scholars' Association events and functions, for the purposes of administering those voluntary activities.

3.4 Disclosure of Personal Information

The School may disclose personal information, including sensitive information, held about an individual 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
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- medical practitioners
- people providing administrative and financial services to the School
- people providing educational, support and health services to the School, including specialist visiting teachers, counsellors, sports coaches and volunteers
- 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 Apps for Education and ensuring it's proper use
- agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes
- providers of learning and assessment tools
- the provider of our student information system and learning management system engaged for remote technical support services
- recipients of School publications such as newsletters and magazines

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- students' parents
- anyone individuals authorise the School to disclose information to
- anyone to whom we are required to disclose the information by law, including child protection laws.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless agreed otherwise, or the use or disclosure of the sensitive information is allowed by law.

Personal information collected from students is regularly disclosed to their parents. On occasions, information regarding academic and sporting achievements, student activities and similar news is published in School newsletters, magazines and on our website.

Photographs of student activities such as sporting events, school camps and school excursions may be taken for publication in School newsletters and magazines and on our website. The School will obtain permission from parents prior to publication of photographs of students.

3.4.1 Sending and Storing Information Overseas

The School may disclose personal information about an individual to overseas recipients to facilitate a school exchange, visit or trip outside Australia. Consent to provide information will be implied through agreement to the conditions relating to the exchange or trip.

The School may use online or 'cloud' service providers situated inside or outside of Australia to store personal information and to provide services to the School that involve the use of personal information, such as email, instant messaging and education and assessment applications. Where possible, the School's preference is to engage service providers that reside or store the data in Australia. Some limited personal information may also be provided to these service providers to enable them to authenticate users who access their services. An example of such cloud service providers is Microsoft. Microsoft supplies the School with Office 365 and Cloud Storage capability. School personnel and the School's service providers may have the ability to access, monitor, use or disclose emails, communications (i.e. instant messaging), documents and associated administrative data for the purposes of administering Office 365 and ensuring its proper use.

3.4.2 Marketing and 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. Personal information held by the School may be disclosed to organisations that assist in the School's marketing and fundraising, for example, the Wilderness School Foundation Incorporated and, on occasions, external marketing and fundraising organisations. Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

Members of the broader community may elect to not be contacted by the School concerning marketing and fundraising matters. All emails to the broader community concerning marketing and fundraising provide the option to opt out from future communications. Where such persons no longer wish to be contacted by the School, their preferences will be updated in our database.

3.5 Management and Security of Personal Information

The School's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

The School has in place steps to protect the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods.

These steps include:

- Restricting access to information on the School database 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 on the premises (including the Boarding House office), that these files are stored in lockable cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis
- Implementing physical security measures around the School buildings and grounds to prevent break-ins

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- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality, 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 APPs or a similar privacy regime

If the School holds personal information about an individual and no longer needs the information for any purpose for which the information may be used or disclosed, if the information is not contained in a Commonwealth record, and the School is not required by law to retain the information, the School will take steps reasonable in the circumstances to destroy the information or to ensure that the information is de-identified.

3.6 Access and Correction of Personal Information

Under the Privacy Act, an individual has the right to seek access to, and/or the 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 with sufficient maturity 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's Privacy Officer by telephone or in writing. The School may require you to verify your identity and specify what information you require. It is the responsibility of individuals to contact the School to update any personal information held by the School. The School may charge a reasonable fee to cover the cost of verifying an application for information and locating, retrieving, reviewing, updating and copying any material requested (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 cannot provide an applicant with access to that information, we shall provide a written explanation of the reason(s) for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.

3.7 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. 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 Privacy Officer by telephone or in writing. However, there may be occasions when access is denied. Such occasions could include, but are not limited to, 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, upon 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, as determined by the School's Privacy Officer.

3.8 Enquiries and Complaints

Further information about the way the School manages the personal information it holds or inquiries related to the School's compliance with the APPs should be directed to the School's Privacy Officer. Please contact the Business Manager who acts as the School's Privacy Officer by email, post or telephone using the following contact details: Wilderness School, ATTN: The Business Manager, 30 Hawkers Road, Medindie SA 5081, PO Box 93 Walkerville SA 5081, Phone +61 8 8344 6688, info@wilderness.com.au

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.

4. Definitions

Personal Information – means information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not, and whether the information is recorded in a material form or not. It includes all personal information regardless of its source which identifies an individual or allows an individual to be identified.

Personal information does not include information which has been de-identified so that the individual is no longer identifiable either from the information or from the information when combined with other information reasonably available to the School.

Health Information – Health information is a subset of sensitive information. It is any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided, currently or in the future, to an individual that is also personal information. Health information also includes personal information collected in the course of providing a health service.

Sensitive information – means personal information relating to:

- racial or ethnic origin
- political opinions
- membership of a political association
- religion
- trade union or other professional or trade association membership
- philosophical beliefs
- sexual orientation or practices
- criminal record
- health information, genetic information and biometric information

5. References

- [Standard Collection Notice](#)
- [Employment Collection Notice](#)
- [Contractor Collection Notice](#)

6. Applicable Standards and Legislation

- [Commonwealth Privacy Act 1988](#)
- [Australian Privacy Principles](#)

Policy Title	Privacy Policy & Standard Collection Notice
Version Number	GSP0036a_Version 4.0
Approved by	Principal

Standard Collection Notice

This notice explains how the School handles the personal information of students and parents.

How and Why the School Collects Personal Information

The School collects personal information, including health and 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, through technology systems or in the course of conversations.

The School will generally collect personal information held about an individual directly from the individual (or their parent in the case of students). On occasion, the School may also collect personal information from third parties, such as other educational facilities, authorities, or service providers.

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.

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, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School.

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. 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.

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.

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.

To Whom the School Discloses Personal Information

The School may disclose personal and sensitive information for educational, administrative and support purposes. 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
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- medical practitioners
- people providing administrative and financial services to the School
- people providing educational, support and health services to the School, including specialist visiting teachers, specialist advisors, counsellors, sports coaches and volunteers
- providers of learning and assessment tools
- providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection and students with additional needs
- agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;
- recipients of School publications such as newsletters and magazines, on our intranet site
- students' parents or guardians
- anyone individuals authorise the School to disclose information to
- anyone to whom we are required to disclose the information by law, including child protection laws.

Personal information collected from students is regularly disclosed to their parents or guardians.

The School separately obtains permissions for photographs and videos of students as part of the enrollment process and obtains permissions to include photographs or videos in our promotional material, including making it available publicly on the internet.

Overseas Storage and/or Disclosure

The School may use online or 'cloud' service providers situated inside or outside of Australia to store personal information and to provide services to the School that involve the use of personal information, such as email, instant messaging and education and assessment applications. Where possible, the School's preference is to engage service providers that reside or store the data in Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.

Fundraising

The School may engage in fundraising activities. Personal information may be disclosed to organisations that assist in the School's fundraising activities solely for that purpose.

Further details about the collection and use of personal information is set out in the School's Privacy Policy, which is available on the School's website www.wilderness.com.au or from Wilderness School email info@wilderness.com.au or phone 8344 6688.

Your Rights and How to Complain

The School's Privacy Policy, accessible on the School's website, sets out how you can:

- seek access to and correction of personal information held by the School; and
- make a privacy complaint and how we will handle the complaint.

Employment Collection Notice (for job applicants)

By submitting a job application or otherwise providing your personal information, you consent to Wilderness School ("School, we or us") collecting, holding, using and disclosing your personal information as described in this notice and our Privacy Policy. If the School is unable to collect, handle, use and disclose personal information about you as set out in this notice and the Privacy Policy, we may be limited in our ability to assess your application.

Personal information may be collected directly from you through a written job application, in the course of conversations or formal interviews, and other methods of selection including psychometric testing or assessment tasks. The School may collect personal information about you from third parties in the course of checking your qualifications and employment references and where, permitted by law, from criminal record checks and other checks required under child protection laws.

Before providing the School with personal information about another person (e.g., employer references), please obtain their consent and explain to them the purpose of the disclosure.

If your application for a specific position is unsuccessful, the School will keep your application on file for a period of up to 12 months after that position has been filled. The purpose of keeping your application on file is to consider your suitability for other positions that arise during the period.

The School may disclose personal information about job applicants for recruitment, administrative and support purposes. This may include disclosures in the course of checking your qualifications and employment references and where permitted by law conducting criminal record checks, and any other checks required under School's Child Protection Policy and related legislation.

We will not disclose your personal information to a third party without your consent unless otherwise permitted. However, 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. We may disclose some limited personal information to service providers, like Microsoft, who supplies the School with Office 365 and Cloud Storage capability, 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 inside or outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.

The School's Privacy Policy, accessible on the School's website, contains details of how you may seek access to and correction of your personal information which the School holds, as well as how you can make a privacy complaint and how we will handle the complaint.

Contractor Collection Notice

By submitting a job application or otherwise providing your personal information, you consent to Wilderness School ("School, we or us") collecting, holding, using and disclosing your personal information as described in this notice and our Privacy Policy. If the School is unable to collect, handle, use and disclose personal information about you as set out in this notice and the Privacy Policy, we may be limited in our ability to assess your application.

The School collects information about job applicants in order to assess their suitability for employment. Such personal information may be collected directly from you through a written job application and resume, in the course of conversations or formal interviews, and other methods of selection including psychometric testing or assessment tasks. The School may collect personal information about you from third parties in the course of checking your qualifications and employment references and where, permitted by law, from criminal record checks and other checks required under child protection laws.

Before providing the School with personal information about another person (e.g., employer references), please obtain their consent and explain to them the purpose of the disclosure.

If your application for a specific position is unsuccessful, the School will keep your application on file for a period of up to 12 months after that position has been filled. The purpose of keeping your application on file is to consider your suitability for other positions that arise during the period.

The School may disclose personal information about job applicants for recruitment, administrative and support purposes. This may include disclosures in the course of checking your qualifications and employment references and where permitted by law conducting criminal record checks, and any other checks required under School's Child Protection Policy and related legislation.

We will not disclose your personal information to a third party without your consent unless otherwise permitted. However, 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. We may disclose some limited personal information to service providers, like Microsoft, who supplies the School with Office 365 and Cloud Storage capability, 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 inside or outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.

The School's Privacy Policy, accessible on the School's website, contains details of how you may seek access to and correction of your personal information which the School holds, as well as how you can make a privacy complaint and how we will handle the complaint.