



The Scots College

Sydney Australia

Privacy Policy

This Privacy Policy sets out how The Scots College will collect, use and manage personal information. The College's privacy obligations are governed by the *Privacy Act 1988 (Cth)* (Privacy Act), Australian Privacy Principles (Privacy Principles) and the *Health Records and Information Privacy Act 2002 (NSW)* (Health Records Act) (collectively, Privacy Laws).

Who Does This Policy Apply To?

This Policy applies to all individuals whom we have dealings with including students, parents and carers, prospective parents and carers, job applicants, staff, volunteers, alumni, contractors, visitors and others who come into contact with the College and who provide personal information (as defined in the Privacy Laws) to The Scots College.

What Kinds of Personal Information Do We Collect?

The types of information the College collects, stores and uses include but is not limited to:

- name and date of birth, address and contact details including next of kin/emergency contact, gender, language, culture, religion and other family relationships;
- parent details including contact details, education and occupation;
- health information including medical records and immunisation records and individual health care plans;
- counselling records;
- health fund details and Medicare number;
- court orders;
- photos and videos;
- education and employment history;
- police and Working with Children Checks;
- salary, superannuation and bank details;
- complaint records and investigation reports; and
- workplace IT surveillance data.



How Do We Collect Your Personal Information?

The Scots College collects personal information directly from you via school forms, email monitoring, letters, telephone conversations, meetings, our website and through surveillance such as using CCTV cameras on the school premises. We may also collect personal information from other sources such as medical professionals, financial transactions and third parties nominated by you such as referees or representatives.

Sometimes we may be provided unsolicited personal information which is personal information received without having taken active steps to collect that information. In the event we receive unsolicited personal information, we will only store, use and/or disclose that information if we could have collected that information following the Privacy Laws. If we determine we could not have collected the unsolicited personal information, we will destroy or de-identify the unsolicited personal information.

We may collect information based on how individuals use our website. The College uses cookies and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns and to record statistics on website traffic.

How We Use Personal Information

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include but are not limited to:

- provide education, pastoral care, extracurricular and health services;
- administration and management of those services including billing and insurance functions;
- direct communication with parents, carers and students;
- comply with legal obligations including child protection obligations and protect our lawful interests;
- provide updates to parents and carers as to school and community matters through correspondence, newsletters and magazines;
- provide ongoing information, marketing, promotional and fundraising activities;
- support the activities of school associations such as The Scots College Old Boys Union;
- support the activities of The Scots College Foundation;

- support community-based causes and activities, charities and other causes in connection with The Scots College's functions or activities including The Scots College Women's Association;
- creation of class lists;
- improvement of our day-to-day operations including training our staff, systems development, programs and services development, planning, research and statistical analysis;
- employment of staff;
- engaging contractors and volunteers; and
- monitor and measure the use of our websites or apps.

How We Store and Secure Personal Information

The Scots College has implemented appropriate physical, electronic and administrative safeguards to protect your personal information from loss, misuse, alteration, theft, unauthorised access, or unauthorised disclosure. The security of your personal information is important to us and we evaluate our safeguards on an ongoing basis to help minimise risks as they become known. However, we cannot unconditionally guarantee the security of personal information collected and stored by us.

We expect our employees, volunteers and agents who handle personal information to comply with the Privacy Laws. Matters of privacy and confidentiality are addressed in our contractual arrangements with employees and services external to the College.

The Scots College has implemented internal policies and procedures that employees and volunteers must comply with when handling personal information. All of your personal information is stored by The Scots College securely in either hard copy or electronic form with protections such as firewalls, password authentication, encryption and physical security and access restrictions. Once the College no longer needs the personal information held by us, we will take reasonable steps to destroy or de-identify the personal information.

The Scots College may also store personal information in the 'cloud' which may mean that it resides on servers that are situated outside Australia.

Our website may contain links to other third-party websites outside The Scots College. We are not responsible for the information stored, accessed, used or disclosed on such websites and we cannot comment on their privacy policies.

Who Might We Disclose Personal Information To?

In some circumstances, we may disclose personal information, where it is reasonably necessary to carry our functions, including sensitive information to:

- employees, volunteers, contractors or other representatives and service providers such as visiting teachers, counsellors and coaches;
- medical and allied health practitioners;
- organisations associated with The Scots College;
- other parents and carers and recipients of school publications
- other schools;
- recipients of school publications;
- agents, contractors or service providers who provide operational services to The Scots College or who help provide our services to you such as accounting, cloud storage and processing, data processing and data analysis, marketing and consumer analysis, website, information technology or other relevant services.
- professional advisers, bankers and solicitors;
- law enforcement agencies, government bodies or third parties as agreed or authorised by law;
- insurers, courts, tribunals and regulatory authorities as agreed or authorised by law; and
- any other party to whom you authorise us to disclose your personal information.

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, the College 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); or
- otherwise complying with the Privacy Laws.

Personal Information of Students

The Privacy Laws do not differentiate between adults and children and do not specify an age at which individuals can make their own decisions about their personal information.

At The Scots College, we take a common sense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents or carers. We will treat notices provided to parents or carers as notices provided to students and we will treat consents provided by parents or carers as consents provided by a student.

We are however cognisant of the fact that children do have rights under the Privacy Act and that in certain circumstances (especially when dealing with older students and sensitive information), it will be appropriate to seek and obtain consent directly from students. We also acknowledge that there

may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents or carers.

There may also be occasions where parents or carers are denied access to personal information with respect to their children because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the College's duty of care to the student.

How We Ensure the Quality of Your Personal Information

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis, we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

How to Gain Access to Your Personal Information

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us. Upon receiving such a request, we will take steps to verify your identity before granting access or correcting the information.

If we do not agree to provide you with access or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

We may charge a fee to cover the cost of verifying your request and locating, retrieving, reviewing, copying and supplying any material requested. Additionally, that fee will be communicated to you as soon as reasonably possible after it has been determined.

How We Protect Your Personal Information Amongst Parents and Carers

Parents and carers are given the opportunity each year to opt in or opt out of the disclosure of their contact details as part of the class lists. If parents or carers opt in to provide their contact details to

class parents, The Scots College does not have any responsibility for what a parent or carer may do with those contact details which are being provided to a student's class.

Privacy Complaints

If you wish to make a complaint about a breach by us of the Australian Privacy Principles you may do so by providing your written notification by email, letter, facsimile or by personal delivery to any one of our contact details as noted below as soon as possible.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

If the individual is not satisfied with our response, you may refer the complaint to the Office of the Australian Information Commissioner (OAIC) at <https://www.oaic.gov.au/>. A complaint can be made using the OAIC online Privacy Complaint form or by mail, fax or email. A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

How to Contact Us

Email	privacy@scots.college
Phone	+61 2 9391 7600
Write to	The Privacy Officer (external), Locked Bag 5001, Bellevue Hill NSW 2023.

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

Changes to Our Privacy and Information Handling Practices

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website at www.scots.college regularly for any changes.

This Privacy Policy was last reviewed on 7 November 2023