

Association of Heads of Independent Girls' Schools of NSW (AHIGS) AHIGS Privacy Policy

The purpose of this policy is to ensure that in the course of AHIGS' activities, we manage and protect personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

This policy applies to all AHIGS staff, students of members' schools ('Students'), parents / guardians ('Parents'), contractors and volunteers.

AHIGS may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to AHIGS operations and practices and to make sure it remains appropriate to the changing environment in which AHIGS operates.

What kinds of information does AHIGS collect and how does AHIGS collect it?

The type of information AHIGS may collect and hold includes automatically generated IP address logs and usage information and other information, including health and sensitive information, about:

- Students and parents before, during and after participation in an AHIGS activity;
- Staff members, job applicants, volunteers and contractors; and
- other people who come into contact with AHIGS.

Personal Information you provide: AHIGS will generally collect personal information held about an individual by way of forms filled out by contractors, parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions, other parties may provide personal information.

Personal Information provided by other people: In some circumstances AHIGS may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or information from a members' school.

Exception in relation to employee records: Under the Privacy Act and the Health Records and Information Privacy Act 2002 (NSW), the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to AHIGS treatment of an employee record, where the treatment is directly related to a current or former employment relationship between AHIGS and the employee.

How will AHIGS use the personal information you provide?

AHIGS 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 of members' schools and Parents: In relation to personal information of students and parents, the primary purpose of collection is to enable AHIGS to provide access to activities and competitions for the students. This includes satisfying the needs of parents, the needs of the student and the needs of members' schools when performing its functions.

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

- to keep parents informed about matters related to their child's participation in activities, events and competitions, through correspondence and newsletters;
- day-to-day administration of activities, events or competitions;

- to satisfy AHIGS legal obligations and allow AHIGS to discharge its duty of care.

In some cases where AHIGS requests personal information about a student or parent, if the information requested is not provided, AHIGS may not be able to allow the student to participate in any AHIGS activity, event or competition.

Staff members, job applicants and contractors: In relation to personal information of staff members, job applicants, and contractors, AHIGS primary purpose of collection is to assess and (if successful) to engage the staff member, applicant or contractor, as the case may be.

The purposes for which AHIGS uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be;
- for payment of services;
- for insurance purposes;
- to satisfy AHIGS legal obligations, for example, in relation to child protection legislation and for a Working With Children (WWC) clearance.

Volunteers: AHIGS also obtains personal information about volunteers who assist the Association in its functions or conduct associated activities to assist the volunteer and AHIGS to work together.

Marketing and fundraising: AHIGS treats marketing and seeking donations for the future growth and development of AHIGS, as an important part of ensuring that AHIGS continues to function and that AHIGS events are of the highest quality. Personal information held by AHIGS may be disclosed to organisations that assist fundraising, for example, external fundraising organisations.

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

Who might AHIGS disclose personal information to and store your information with?

AHIGS may disclose personal information, including sensitive information, held about an individual to:

- members' schools including schools other than the student's school;
- government departments;
- medical practitioners;
- people providing services to AHIGS, including coaches;
- recipients of AHIGS publications, such as newsletters;
- parents;
- anyone you authorise AHIGS to disclose information to; and
- any person to whom we are required to disclose the information to by law.

Sending and storing information overseas:

AHIGS may disclose personal information about an individual to overseas recipients, for instance, to facilitate an overseas event, activity or competition. However, AHIGS 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 Australian Privacy Principles or other applicable privacy legislation.

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

How does AHIGS treat sensitive information?

In referring to '*sensitive information*', AHIGS means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical

beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.

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

Management, security and disposal of personal information

The staff of AHIGS are required to respect the confidentiality of personal information and the privacy of individuals.

AHIGS has in place steps to protect the personal information that it 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.

AHIGS has in place steps to delete or de-identify any personal information at the cessation of the relevant obligatory retention period.

Access and correction of personal information

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which AHIGS holds about them and to advise AHIGS 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 update any personal information that AHIGS holds about you or your child, please contact the AHIGS Executive Officer in writing. AHIGS may require you to verify your identity and specify what information you require. AHIGS 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, AHIGS 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

AHIGS respects every parent's right to make decisions concerning their child's participation in an AHIGS activity, event or competition.

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

Responding to Data Breaches

In the event that the Association becomes aware of, or has reasonable grounds to suspect, an unauthorised access to, or disclosure of, personal information, or the loss of personal information where the loss is likely to result in unauthorised access or disclosure of personal information, the Association will take appropriate, prompt action to investigate the breach and take remedial action in accordance with the response plan to:

- Confirm, contain and keep records of the data breach and do a preliminary assessment. Assess the data breach and evaluate the risks associated with the data breach including if serious harm is likely
- Consider notification requirements (the Office of Australian Information Commissioner ("OAIC") and any affected individuals
- Review the data breach or Eligible Data Breach to prevent future breaches.

Enquiries and complaints

If you would like further information about the way AHIGS manages the personal information it holds, or you wish to complain that you believe that AHIGS has breached the Australian Privacy Principles please contact the AHIGS Executive Officer at LG1, 56 Delhi Road, North Ryde, NSW, 2113.

AHIGS 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.