

## Privacy Policy

This statement outlines the privacy policy of the Association of Independent Schools of the ACT (AISACT) and describes how the Association uses and manages personal information provided to or collected by the Association.

The Association is bound by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Privacy Act). The Principles are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is managed.

Generally, 'personal information' is information or an opinion relating to an individual which can be used to identify that individual. 'Sensitive information' includes information relating to a person's racial or ethnic origin, political opinion, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, and health 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 agreed otherwise by the individual, or the use or disclosure of that sensitive information is allowed by law.

### **The type of information collected**

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

- Principals, staff and students of member schools;
- Job applicants, staff members of AISACT, volunteers and contractors;
- Other people who come into contact with AISACT.

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee's record. As a result, this Privacy Policy does not apply to AISACT's treatment of an employee's record, where the treatment is directly related to a current or former employment relationship between AISACT and an employee.

AISACT collects personal information about our clients/customers, suppliers, employees, contractors, other contacts and others about whom advice is to be given, to understand and meet their needs, to conduct our activities and to meet legal obligations.

AISACT will generally collect personal information about an individual by way of forms filled out by employees, school personnel, parents and students, face-to-face meetings and interviews, and telephone calls. On occasions, people other than those associated with member schools provide personal information.

In some circumstances AISACT may be provided with personal information about an individual from a third party; for example a report provided by a medical professional or a reference from another association or organisation.

## **The use of personal information**

AISACT will use personal information it collects for the purpose described at the time of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which the individual has consented.

In certain circumstances, AISACT may use aggregated data to meet its commitments as a service provider to independent schools and their students. In such circumstances, data will be aggregated in such a manner that personal information will not be accessible to third parties.

### **Students**

In relation to personal information of students, the primary purpose of collection is to enable AISACT to assess applications for funding or other program activities.

Where AISACT requests personal information about a student, this information is gathered for the primary purpose to enable AISACT to assess the student's eligibility for funding, services or other support. With the consent of parents [or guardians], independent schools in the ACT will provide AISACT with personal information, including sensitive information, about students for whom the Association is seeking or providing funding or support from or on behalf of Government and non-Government agencies. This information will be used solely for the purpose for which it is has been explicitly collected.

### **Job applicants, staff members, consultants and contractors**

In relation to personal information of job applicants, staff members, consultants and contractors, the Association's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member, consultant or contractor.

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

- In administering the individual's employment or contract;
- For insurance purposes;
- To provide information to Member schools;
- To satisfy the Association's legal requirements.

Personal information held about job applicants and contractors is collected solely for the primary purpose of assessing their claims to be engaged and will be used for no other purpose. Permission will be sought to hold the information for any extended period of time. Upon written request, AISACT will return all personal information to unsuccessful applicants. Such requests should be made no more than five working days following receipt of the letter notifying that the job application was unsuccessful.

## **School staff and governing bodies**

AISACT uses personal information about School Staff and Governing Bodies to provide services to Member schools including the provision of information, professional development, administration of programs, representation and advocacy and the promotion of independent schools to the public.

AISACT will not disclose personal information other than as necessary to perform the above tasks, or as required or authorised by law, or with permission.

## **Volunteers**

AISACT also obtains personal information about volunteers who assist AISACT in its functions or conduct associated activities that enable AISACT and volunteers to work together.

## **Personal Information provided by Other People**

In some circumstances the Association may be provided with personal information about an individual from a third party, for example a recommendation for a committee membership. The Association expects that the person providing the personal information has informed the person about whom the information is being provided of their intentions to do so.

## **Publicity**

The Association uses a minimal level of personal information, usually with the express knowledge of the individual, to keep members of independent school communities and members of the wider public informed of its achievements and activities. Sensitive information will not be used for this purpose without the consent of the individual.

## **Accessing and amending personal information held by the Association**

In accordance with the Privacy Act, an individual has the right to seek to access any personal information the Association holds about them and to advise the Association of any perceived inaccuracy with that information.

The APP's provide some exceptions to an individual's rights in this regard; for example, we will not provide information when this would have unreasonable impact upon the privacy of others. To make a request to access this information, individuals should contact us in writing. The AISACT will require individuals to verify their identity and to specify what information they require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

A person may seek to update their personal information held by AISACT by contacting the Executive Director at any time. The Australian Privacy Principles require that AISACT not store personal information any longer than is necessary.

The members of staff of the Association and individuals who serve on committees conducting the business of the Association are required to respect the confidentiality of personal information and the privacy of individuals.

The Association has in place procedures to protect the personal information it holds from misuse, loss, unauthorised access, modification or disclosure.

The Association endeavours to ensure that the personal information it holds is accurate, complete, current and not held for longer periods than is necessary.

### **Disclosure of personal information held by the Association**

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

- Member schools
- Government departments and education authorities
- People providing services to AISACT
- Recipients of AISACT publications, like newsletters and magazines
- Anyone to whom the individual authorises AISACT to disclose information.

Such information will only be disclosed in accordance with the clauses contained in this Policy.

The Association will not wilfully send personal information about an individual outside Australia without obtaining the consent of the individual.

### **Complaints handling**

An individual has the right to lodge a complaint with the Association about a perceived breach of the APPs by the Association. To make a complaint individuals should contact the Association in writing. Upon the receipt of such a complaint the Association will acknowledge the receipt of the complaint and ask the individual how they would like to see their complaint resolved.

The Association will work with the individual to resolve the complaint to the individual's satisfaction where practicable and possible to do so. In the event that a complaint is not able to be resolved the Association will advise the individual of the circumstances surrounding that decision.

If the individual is dissatisfied with the Association's decision about their complaint the individual can ask for reconsideration of that decision by the Association's governing body.

### **Disposal of personal information held by the Association**

In the circumstances where the Association holds personal information about an individual and the Association no longer needs that information for any purpose for which the information may be used or disclosed and the information is not contained within a Commonwealth record and where the Association is not required by or under an Australian law to retain the information – the Association will destroy the information or de-identify that information as soon as is reasonably practical to do so.

### **Links to Other Web Sites**

When using a link from the AISACT Website to the websites of third parties, those websites are not subject to AISACT privacy and security standards. Those third parties are responsible for informing users of their own privacy policies.

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

The current version of this policy is available at [www.ais.act.edu.au](http://www.ais.act.edu.au)