

EMPLOYEE PRIVACY POLICY

PURPOSE

Tintern Grammar is committed to respecting the privacy of all members of the Tintern Grammar community and of the personal information collected in order to carry out its purposes, functions and activities. This policy sets out Tintern's commitment to respecting privacy and how that commitment is to be carried out.

COMMENCEMENT AND VARIATION

This policy commenced operation on 1 December, 2009 and replaces all previous privacy policies of the School. This policy is subject to variation by Tintern Grammar from time to time. Amended policies will be communicated to all affected parties.

PRIVACY LAWS AND TINTERN GRAMMAR

The Privacy Act 1988 (Cth.) (the 'Act') contains ten National Privacy Principles (NPPs) which apply to parts of the private sector, regulating the way in which private sector operators are required to handle personal information. In some circumstances, the handling of employee records in relation to current and former employment relationships by an employer is exempt from the NPPs. While Tintern Grammar is not bound by the NPPs in relation to the handling of employee records, Tintern Grammar supports the NPPs as part of its commitment to respecting the privacy of employees.

COLLECTION OF PERSONAL/SENSITIVE INFORMATION

Tintern Grammar will only collect personal/sensitive information that is necessary and incidental to the School's purposes, functions and activities. Tintern Grammar will collect personal information about an individual only by lawful and fair means and not in an unreasonably intrusive manner. So far as it is reasonably practicable to do so, information collected will be directly from the individual concerned or members of their immediate family. Tintern Grammar will take reasonable steps to ensure that an individual is aware of the purposes for which the information is collected.

Personal information is information or an opinion (whether recorded in a material form or not) about an individual whose identity is apparent or can reasonably be ascertained, from the information or opinion.

Sensitive information is a special category of personal information. It is information or an opinion about an individual's:

- Racial or ethnic origin
- Political opinions
- Membership of a political association
- Religious beliefs or affiliations
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual preferences or practices
- Criminal record

Sensitive information also includes health information about an individual; or genetic information about an individual that is not otherwise health information.

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Tintern Grammar will not collect sensitive information without the individuals' consent unless the collection of such information is required under law or for any other authorised reason as prescribed in the NPPs in the *Privacy Act 1988* (Cth.) (the 'Act').

Tintern Grammar collects personal information from/about past, current and prospective staff (including casuals), students, parents/guardians of students, other schools, benefactors and external contractors. Personal information that Tintern Grammar collects includes:

- Names
- Identification Numbers
- Addresses
- Email Addresses
- Telephone Numbers
- Emergency Contacts
- Photographic Identification
- Qualifications / Skills
- Medical Information
- Working with Children Checks / Police Checks

USE AND DISCLOSURE OF PERSONAL INFORMATION

Use of Personal/Sensitive Information

The primary purpose of collecting personal information is to enable Tintern Grammar to carry out its purposes, functions and activities. Tintern Grammar will not disclose personal information to third parties without the consent of the individual or their parent/guardian, except where the disclosure is required under law or for any other authorised reason as prescribed in the NPPs.

Access to Personal Information

Tintern Grammar will provide access to personal information under:

- Freedom of Information legislation
- Legislative Obligations
- Individual Consent Arrangements
- Request by the individual to access their own file (to the extent allowed under the NPPs)
- Tintern staff will only be provided with access to personal information where it is a necessary function of their role.

No Consent Provided

Tintern Grammar will only collect information without the consent of the individual or their parent/guardian where it is impracticable to gain such consent.

Removal of Information

Tintern Grammar will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure.

Tintern Grammar will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information was provided. All reasonable steps will be taken to destroy or permanently de-identify personal information if it is no longer needed for any purpose.

STAFF OBLIGATIONS

If a staff member collects, uses, discloses or handles personal information on the School's behalf, the staff member must meet the relevant requirements of the NPPs. Staff members

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must only collect, handle, use, disclose and store the information for the agreed purposes only. It is expected that any such information or documents shall be regarded as confidential and shall remain the property of the School at all times. Therefore, such information or documents shall not be copied, transmitted, disclosed or communicated to any person or external entity not authorised to access such documents or information.

PRIVACY COMPLAINTS HANDLING PROCEDURE

If an individual considers that there has been a breach of this policy or of the NPPs in respect to that individual, a written complaint must be forwarded to the Principal within twenty-one (21) days of the time the complainant first became aware of the apparent breach. The complaint must specify details of the apparent breach in writing.

The Principal will undertake to investigate the alleged breach and must make a determination on a complaint within thirty (30) days of receipt of the complaint. The complainant will be advised of the outcome in writing. If the Principal determines that there has been a breach of the policy he or she will advise the relevant Tintern staff members, who are directly involved, of the outcome including any action required in order to remedy the breach. Tintern Grammar will endeavour to assure confidentiality in relation to all complaints and matters will only be discussed with relevant staff members who are involved in the complaint.

Disciplinary action, up to and including the termination of employment, may be applied to staff members who are found to be in breach of this policy or of the NPPs.

RELATED MATERIAL

The Privacy Act 1988

Approval

Policy Approved By:	Tintern Grammar Executive
Date Approved:	December, 2009
Revised:	July, 2016
Next Revision Date:	July, 2018