



PRIVACY POLICY

Tintern Grammar (**Tintern, us, we, our**) is bound by the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*. This privacy policy outlines how Tintern handles personal information.

We will update this privacy policy when our information handling practices change and publish updates on our website.

1. WHO WE ARE

- 1.1 We collect, hold, use and disclose personal information to carry out our functions or activities, which include:
- (a) provide education by establishing, owning and operating the school and Early Learning Centre, including by organising events and excursions;
 - (b) to advance Christian education in the Anglican tradition; and
 - (c) managing our students, staff, contractors and volunteers;
 - (d) communicating with parents, alumni and our community, for example, to send newsletters or organise events and fundraisers;
 - (e) meeting our duty of care to our students and staff; and
 - (f) managing enrolment, payment of fees and debt collection.

2. COLLECTING OF YOUR INFORMATION

- 2.1 We try to only collect the information we need for the particular function or activity we are carrying out. We mainly collect personal information directly from you, when you give it to us through paper forms, online forms or over the phone.
- 2.2 On occasion, we collect information indirectly – from third parties. For example:
- (a) when you sit a scholarship test, Tintern will collect information about your results from the third party;
 - (b) when you apply as an international student Tintern will often collect information from your Agent; and
 - (c) when you apply for an employment position, we may collect information from your referees.
- 2.3 We collect personal information when a student is enrolled at Tintern including the contact details, name and other personal information about both students and parents or guardians, and past school reports, evidence of academic and extra-curricular activities. We also regularly collect information about students, for example, via excursion forms, incident reports, and attendance and assessment records.
- 2.4 We may also collect photos and videos for our social media, or when these media projects form part of assessments. We may also collect court orders, parenting plans and legal correspondence regarding family arrangements for the purpose of meeting Tintern's duty of care.
- 2.5 We sometimes collect personal information from parents, alumni and other community members so we can contact them about what is happening at Tintern, and involve them in areas of their interest, such as becoming a volunteer, speaking at a career event, or attending a showcase or fundraising event.
- 2.6 We collect contact details, vaccination status and child safety information about all staff, contractors and volunteers who come to our premises. We will ask to collect this information before you start working with us.

Collecting sensitive information

- 2.7 Sometimes we may need to collect sensitive information about you, including information about your health, religious beliefs, work history via reference checks, criminal history via working with children clearances and police checks, racial or ethnic origin, political opinions, association memberships, and sexual orientation and genetic or biometric information. For example, if you want to be an employee, volunteer or other office bearer of Tintern we will need to conduct child safety clearance checks.

- 2.8 We also collect health information:
- (a) about immunisations at the time of enrolment, and as students become immunised;
 - (b) when students present to first aid or have allergies or anaphylaxis reactions;
 - (c) as part of our response to the COVID-19 pandemic;
 - (d) with parent consent if parents have medical or health conditions which may impact a student and how Tintern manages the health and wellbeing of the student; and
 - (e) to meet our legal obligations to make reasonable adjustments for students and staff who have a disability.
- 2.9 We may collect information about your racial or ethnic origin because we are required to collect information about cultural and linguistic (CALD) characteristics and occupation of parents and guardians for auditing and to meet conditions of government funding. We also collect visa information and information and living arrangements in relation to international students. This may include information about racial or ethnic origin.

Collecting through our website

- 2.10 Tintern's public website, www.tintern.vic.edu.au, is hosted in Australia. We will collect information that you provide to us when signing up to mailing lists and registering for our events, or when submitting an enquiry via our website.

Anonymity

- 2.11 Where possible, we will allow you to interact with us anonymously or using a pseudonym. However, for most of our functions and activities we usually need to collect your name and contact information. If you want to enrol your child at Tintern or work with us (including as a volunteer), it is not possible to interact with us anonymously due to our child safety practices.

3. SOCIAL NETWORKING SERVICES

- 3.1 We use social networking services such as Twitter, Facebook, Instagram, LinkedIn, WhatsApp, Vimeo, WeChat and YouTube to communicate with parents, and the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for [Twitter](#), [Facebook](#) and [YouTube](#) (a Google company) on their websites.

4. DISCLOSURE

- 4.1 Common situations in which we disclose information are detailed below.

Child safety

- 4.2 If you work with us (including as a volunteer), we may disclose personal information about you as part of our child safety requirements, as required or authorised by law. For example, Tintern is required by law to report information about reportable allegations under the Reportable Conduct Scheme to the Commission for Children and Young People. The School may also report to the Victorian Institute of Teachers, the Victorian Registration and Qualifications Authority, the Victorian Department of Education and Training, the Victorian Department of Families, Fairness and Housing, and Victoria Police.
- 4.3 If you are a student, we may disclose personal information about you for the purpose of providing education or maintaining your safety and wellbeing, or when required or authorised to do so by law. For example, there are reporting

obligations for individuals to report to the police under the *Crimes Act 1958 (Vic)*, such as the failure to disclose offence. We may also disclose personal information to other schools or organisations that work with children when required to do so under the Child Information Sharing Scheme.

Social media and photos

4.4 We may disclose your personal information on our social media platforms. It is Tintern's policy to only disclose first names of children on social media. We use a media release form to seek your consent to using photos in which you are reasonably recognisable. When publishing photos for large media programs, we seek updated consent. Parents can update permissions regarding the use of photos at any time via the school Portal.

Our community

4.5 If you express interest in our alumni associations or community groups, we will disclose your contact details so they can get in touch with you.

Software providers and data storage

4.6 We disclose information to some software providers (SaaS). For example, we use the LinkSafe Contractor Management system to collect and store contractor and volunteer information including names, insurance, OH&S documentation, working with children clearances and police checks, trade certifications and vaccination status. LinkSafe's privacy policy is available here: <https://linksafe.com.au/privacy-policy/>.

4.7 We use Synergetic to store information about students and parents and guardians, including financial information.

Debt collection

4.8 We disclose your personal information to our collection agency to assist with collecting payment of fees. We disclose copies of legal documents, such as the enrolment agreement, your contact information and information about changes in relationships.

4.9 We may also collect information about you and your family's financial circumstances if you apply for a scholarship or bursary. This information is collected by Edstart.

Disclosure of sensitive information

4.10 Sensitive information includes information about your health, disability, sexual orientation or practices, or racial or ethnic origins. We only disclose your sensitive information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect or if you agree, for example, to enrol a student in an education course with a non-school senior secondary provider so the student can complete a VET course.

5. DISCLOSURE OF PERSONAL INFORMATION OVERSEAS

- 5.1 We store our information in Australia as our servers are hosted in Australia.
- 5.2 When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.
- 5.3 We sometimes disclose personal information overseas, for example, when we are organising an overseas trip for students, or when enrolling international students. Enrolling international students may involve disclosing personal information to Agents who represent international students.

6. QUALITY OF PERSONAL INFORMATION

6.1 To ensure the personal information we collect is accurate, up-to-date and complete, we promptly update personal information when you tell us something may have changed.

6.2 We also regularly review the quality of personal information, for example, contractors are requested to update their details every 12 months. Parents have access to the portal to update details when they change and may be reminded from time to time, for example, prior to a school camp.

6.3 Contractors and parents have a personal login from which they can update their personal information; either via LinkSafe or Synergetic.

7. STORAGE AND SECURITY OF PERSONAL INFORMATION

7.1 We hold personal information on our cloud storage system, on servers located in Australia, and in physical records stored at Tintern. We retain effective control over any personal information held on our cloud, and the information is handled in accordance with the Australian Privacy Principles.

7.2 We take steps to protect the security of the personal information we hold from both internal and external threats by assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information (data breaches), and taking measures to address those risks.

7.3 Examples of how we limit the risk of data breaches include:

- (a) restrictions on who has access to different types of information (access controls);
- (b) bcc-ing parents and guardians to avoid disclosing email addresses;
- (c) requiring staff to delete photos from personal devices once uploaded to school systems;
- (d) requiring digital information to be stored in Tintern databases (such as Synergetic and Pixevity) or on Tintern devices, and not locally on personal devices;
- (e) strict password requirements, and
- (f) locks on physical storage facilities such as filing cabinets.

7.4 We destroy or archive personal information in a secure manner (for example, we use document destruction bins) when we no longer need it. We are required to archive – and not delete – any information about child safety or child abuse.

8. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

- 8.1 You have the right to ask for access to personal information we hold about you, and ask us to correct that personal information. You can ask for access or correction by contacting Tintern and we will respond within 30 days.
- 8.2 We confirm your identity before we provide access to, or correct, your personal information.
- 8.3 Parents and guardians can update their personal information directly via their portal access to Synergetic. Parents have access to the portal to update details when they change and may be reminded from time to time, for example, prior to a school camp.
- 8.4 We will ask you to verify your identity before we give you access to your information or correct it. If we refuse your request, we will tell you the reasons in writing.

9. HOW TO MAKE A COMPLAINT

9.1 If you wish to complain to us about how we have handled your personal information, you can contact us via the contact details below. Privacy complaints are dealt with care, according to Tintern's Complaints Policy.

Privacy Officer
Principal's Office
Email: principal@tintern.vic.edu.au
Phone: 9845 7777
90 Alexandra Road, Ringwood East 3135