

Privacy Policy	
Contact Officer	Head of Finance, Systems and Administration, Head of Marketing and Community Relations

Purpose	
Overview	
Scope	

Policy	<p>MLC School is bound by the Australian Privacy Principles contained in the Privacy Act 1988. The policy outlines how MLC School collects, uses and manages personal information.</p> <p>The School may from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the School’s operations and practices and to make sure it remains appropriate to the changing school environment.</p> <p>Collection of Personal Information The School collects and holds personal information, including sensitive information about:</p> <ul style="list-style-type: none"> • Students and their parents and/or guardians, during and after the course of a student’s enrolment at MLC School • Job applicants, staff members, volunteers and contractors • Other people who come in contact with the School <p><u>Personal information you provide:</u> The School will generally collect personal information about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, and telephone calls. On occasions, people other than parents and students provide personal information.</p> <p>Some laws governing or relating to the operation of schools required that certain information be collected. These include Public Health and Mandatory Notification laws.</p> <p>Health information about students is ‘sensitive’ information within the terms of the Privacy Act 1988. We ask you to provide medical reports about students from time to time. On occasions Health information may be disclosed to staff to enable the School to discharge its duty of care.</p> <p><u>Personal information provided by other people:</u> In some circumstances the School may collect personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.</p>
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If you provide the School with the personal information about other people, such as doctors or emergency contact, we encourage to inform them that you are disclosing that information to the School and why, that they can access that information if they wish, and that the School does not usually disclose the information to third parties.

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

Use of Personal Information

The School 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 reasonable expected, or to which you have consented.

Students and Parent/Guardians: The School's primary purpose of collecting personal information in relation to students and parents/guardians is to enable the School to provide schooling for the student. This includes satisfying both the needs of parents/guardians and the needs of the student throughout the whole period the student is enrolled at the School.

Photographs of a student may be placed in the School's records, displayed from time to time around the School (including footage on the School's CCTV monitors) and published in school publications, including *Excelsior*, the My MLC School Portal and weekly e-newsletter. For promotional and other marketing material including the School's public website, facebook, video footage and the digital version of Lucis, specific consent will be obtained if the student's identity could be established within the design framework. No student image linked with the student's name will be included in any marketing or promotional material or vehicle without prior written consent.

The purposes for which the School uses personal information of students and parents/guardians include:

- To keep parents/guardians informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- Day-to-day administration
- Looking after a student's educational, social and medical well-being
- Seeking donations and marketing for the School

- To satisfy the School's legal obligations and allow the School to discharge its duty of care.

The School may not be able to enroll or continue the enrolment of a student if necessary information about the student or parent/guardian is not provided.

Job applicants and contractors: In relation to personal information of job applicants and contractors, the School's primary purpose of collection is to access and (if successful) to engage the applicant or contractor.

The purposes for which the School uses personal information of job applicants and contractors include:

- Administering the individual's contract
- Satisfying insurance requirements
- Seeking funds, and marketing for the sShool
- Satisfying the School's legal obligations, for example, in relation to child protection legislation.

Volunteers: The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, to enable the School and the volunteers to work together.

Marketing and fundraising: The School from time to time engages in fundraising activities. Unless a parent/guardian decides to opt out, information received from you, including personal information, may be used to make an appeal to you. (Unless a parent/guardian decides to opt out, it may also be disclosed to organisations that assist in the School's fundraising activities but solely for that purpose, not for their own marketing purposes.)

Parents/guardians, staff, families of prospective students, contractors and other members of the wider school community may from time to time receive marketing material including promotional information. School publications, like newsletters and magazines, which include personal information and visual images, may be used for marketing purposes.

Disclosure of Personal Information

Personal information collected from students may from time to time be disclosed to their parents or guardians. On occasions, information such as academic and sporting achievements, student activities and other news is published in school newsletters, magazines and on our community websites.

For administrative and educational purposes the School from

time to time discloses personal and sensitive information to others including schools, government departments, medical practitioners, and people providing service to the School, including specialist visiting teacher, and (sports) coaches.

With consent, the School may disclose personal information held about a student and/or parent/guardian to:

- Recipients of school publications, like newsletters and magazines
- Media professionals
- Parent associations/committees
- Other parents or guardians for the purpose of distributing a year level contact list or school directory
- Anyone you authorise the School to disclose information to.

Sending information overseas: The School will not send personal information about an individual outside Australia without:

- Obtaining consent of the individual (in some cases, consent will be implied)
- Otherwise complying with the Australian Privacy Principles

The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involves the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

These services store and process limited personal information which is only full name and email address to enable authentication and functionality. Full privacy including disclosure statements can be found on their websites.

Sensitive Information

No sensitive information will be disclosed without the approval of the Principal or a delegate of the Principal. In referring to 'sensitive information' the School means information relating to a person's racial or ethnic origin, political opinions, religion, philosophical beliefs, trade union or other professional or trade association membership, sexual orientation or practices, criminal record, health, genetics and biometrics.

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 and Security of Personal Information

The School's staff are required to respect the confidentiality of student's, parent's and guardian's personal information and the privacy of individuals.

The School has in place steps to protect the personal information the School holds from misuse, loss, unauthorised access, modification or disclosure, by use of various methods including locked storage of paper records and passworded access rights to computerised records.

The School may utilise Third Party providers to deliver online applications for students and staff. Consequently, details may be transferred, stored and processed in Australia or any other country utilised by these Third Party providers.

Updating Information

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the School at any time. If the School is unwilling to amend personal information then you may request a written explanation and, if not satisfied, may contact the Principal. The Australian Privacy Principles require the School not to store personal information longer than necessary.

Access to Personal Information

Under the Privacy Act 1988, an individual has the right to request access to any personal information that the School holds about them and advise the School of any perceived inaccuracy.

Parents/guardians may seek access to personal information collected about them and their daughter by contacting the School. Students may also seek access to personal information about them.

However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the student, or where students have provided information in confidence.

	<p>The School may, at its discretion, on the request of a student grant that student access to information held by the School about them or allow a student to give or withhold consent to the use of their personal information independently of their parents/guardians. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.</p> <p>To make a request to access any information the School holds about you or your child, please contact the Principal in writing.</p> <p>The School may require you to verify your identity and specify what information you require or wish to view.</p> <p>Consent Generally, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The School will treat consent given by parents as consent given on behalf of the student and notice to parent will act as notice given to the student.</p> <p>Enquiries and Complaints Information about the way the School manages the personal information it holds, or to make a complaint regarding a breach of the APPS, contact the Principal in writing. A response will be provided as soon as reasonably possible, but no later than 30 days after receipt of a complaint. If the response is not acceptable then the complaint may be taken to the Office of the Australian Information Commissioner (OAIC).</p> <p>MLC School's Privacy Policy document is available in hard copy from the Head of Finance, Systems and Administration and is published on our website www.mlcsyd.nsw.edu.au</p>
<p>Digital Information</p>	<p>Personal Information We Collect When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as "Device Information."</p> <p>We collect Device Information using the following technologies:</p> <ul style="list-style-type: none"> • Cookies: We may use cookies on our Site from time to time. Cookies are text files placed in your computer's

browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie.

- **Web beacons:** We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

More Detail:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- "Log files" track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web beacons," "tags," and "pixels" are electronic files used to record information about how you browse the Site.

Additionally, when you fill out an online form in order to make an enquiry, or book a tour, we collect certain information from you, including your name, address, email address, and phone number. We refer to this information as "Enquiry Information."

When we talk about "Personal Information" in this Privacy Policy, we are talking both about Device Information and Enquiry Information.

How Do We Use Your Personal Information?

We use the Device Information that we collect to help us improve and optimise our Site (for example, by generating analytics about how our site visitors browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

We also use device information in order to serve re-marketing



ad campaigns through online platforms such as Google Ads and Facebook. For example, if you have visited our Site previously, we may serve you an appropriate advertisement within your social media and online feeds, based on the pages of the site you visited such as 'enrolments'.

Sharing Your Personal Information
MLC School does not sell or rent personal information. Personal information is not disclosed to any organisation outside of MLC School for any purpose other than those purposes set out above without first obtaining customer consent or unless required by law.

We use Google Analytics to help us understand how our customers use the Site – you can read more about how Google uses your Personal Information here:
<https://www.google.com/intl/en/policies/privacy/> .

You can also opt-out of Google Analytics here:
<https://tools.google.com/dlpage/gaoptout>.

Behavioural Advertising
As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by clicking on the following links:
Facebook: <https://www.facebook.com/settings/?tab=ads>
Google: <https://www.google.com/settings/ads/anonymous>
Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/> .

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by visiting <https://www.mlcsyd.nsw.edu.au/contact-us/provide-feedback-or-complaint>

Section	Administration
Date of Approval	April 2018, March 2020
Date of Next Review	
Related Policies,	Privacy Act 1988, Health Records and Information Act 2002



Forms, Guidelines, etc.	
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