

# CAMPBELLTOWN ANGLICAN SCHOOLS

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**BROUGHTON**  
ANGLICAN COLLEGE

*Life Through Christ*



ST PETER'S  
**Heart**

*Life Through Christ*



**ST PETER'S**  
ANGLICAN GRAMMAR

*Life Through Christ*

## **Privacy Policy**

CPo104

**CASC**

**Broughton Anglican College  
St Peter's Anglican Grammar  
St Peter's Heart  
Central Services**

## **1. Introduction**

Campbelltown Anglican Schools' Council develops and reviews policies necessary for the proper functioning, governing and operation of Campbelltown Anglican Schools to manage risk, provide strategic guidance, monitor strategic progress and operational performance and to satisfy its legal obligations (see *section 47*, NSW Education Act and the NESA Registration & Accreditation manual).

## **2. Policy Statement**

Campbelltown Anglican Schools collect, produce and collate private information to be used for business matters, to effectively manage the education of children and to maintain a high level of duty of care toward those children. This policy sets out how CAS manages personal information to meet the requirements of the Commonwealth Privacy Act 1988 and to act in good faith with the CAS community.

## **3. Biblical Basis**

Under God, The Council accepts the mandate and the responsibility for the welfare, encouragement and guidance of the staff and students of CAS, The Council and Central Services. It undertakes to fulfill that responsibility in a way that honours God, that faithfully reflects biblical understandings, and which demonstrates the Christian values of community, compassion, justice and righteousness.

All human authority flows from God to man and should be exercised with the understanding that He will hold everyone accountable on Judgement Day. God's commandments are very clear. Not only are we to be active participants in our surroundings, but we are to pray, give thanks for, respect, and honour all authority. *"For there is no authority except from God, and those which exist are established by God..."* (Romans 13:1b).

## **4. Expanded Policy**

### **4.1. Introduction**

This Privacy Policy sets out how Campbelltown Anglican Schools manage personal information either formally collected or voluntarily provided.

CAS are bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988. In relation to health records, CAS are also bound by the New South Wales Health Privacy Principles which are contained in the Health Records and Information Privacy Act 2002 (Health Records Act).

Under the Privacy Act and the Health Records Act, the Australian Privacy Principles and Health Privacy Principles do not apply to certain treatment of an employee record. As a result, this Privacy Policy does not apply to CAS treatment of an employee record held by CAS, where the treatment is directly related to a current or former employment relationship between CAS and the employee.

This policy will be regularly reviewed, and updated, if necessary, to ensure it remains relevant.

### **4.2. Kinds of personal information collected and methods of collection**

The type of information collected and held by CAS includes (but is not limited to) personal, health and other sensitive data. This information, unless otherwise specified, will be kept indefinitely.

- students, parents and carers before, during and after the period of a student's enrolment at CAS including:
  - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
  - parents'/carers' education, occupation and language background
  - medical information (e.g. details of disability, and / or allergies, absence notes, medical reports and names of doctors)
  - conduct and complaint records, or other behaviour notes, and school reports
  - information about referrals to government welfare agencies
  - counselling reports
  - health fund details and Medicare number
  - any court orders
  - volunteering information
  - photos and videos at Schools events
- job applicants (retained for minimum 6 months), staff members, volunteers and contractors, including:
  - name, contact details (including next of kin), date of birth, and religion
  - information on job application
  - professional development history
  - salary and payment information, including superannuation details
  - medical information (e.g. details of disability, allergies, or medical certificates)
  - complaint records and investigation reports
  - leave details
  - photos and videos at School events
  - workplace surveillance information
  - work emails and private emails (when using work email address) and Internet browsing history
- other people who come into contact with CAS, including name and contact details and any other information necessary for the particular contact with CAS.

#### 4.3. Personal information provided directly

CAS will generally collect personal information held about an individual by way of forms filled out by parents / carers or students, face-to-face meetings and interviews, emails and telephone calls.

#### 4.4. Personal information provided by others

4.4.1. In some circumstances, personal information about an individual may be provided by a third party, for example, a report by a medical professional, a

reference from another school or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

4.4.2. CAS may collect personal information through monitoring of student ICT accounts or CCTV.

#### 4.5. CCTV Surveillance

4.5.1. CAS uses CCTV surveillance across the campuses, including some teaching and learning spaces, to support the safety and wellbeing of students, staff, and visitors. Cameras may use audio recording; however, audio capability varies by location.

4.5.2. Surveillance signage is displayed at the entrances to audio-monitored areas.

4.5.3. Recorded footage and live feeds may be accessed only by authorised personnel. The ICT team, the CEO, the COO/CFO, and the Property and Facilities Manager may view both recorded and live footage. Partisan Protective Security may view live footage only.

4.5.4. All requests to view CCTV footage must be made in writing and must copy the Principal, CEO, COO/CFO, and Property and Facilities Manager.

4.5.5. The school keeps a record of all people who have viewed CCTV footage, including the specific footage accessed. Where CCTV is accessed via the ICT administrator account, the system logs this access as "administrator."

4.5.6. Recordings are securely stored by the school and may be disclosed to investigators, law enforcement agencies, or courts where required.

4.5.7. Individuals whose personal information is captured in CCTV footage may request access to that footage, subject to applicable privacy laws and school procedures.

4.5.8. Audio surveillance is not used in areas where private conversations are likely to occur, such as counselling offices or staff rooms.

#### 4.6. Students, Parents and Carers

The purposes for which CAS use personal information of students, parents and carers include:

- to keep parents and carers informed about matters related to their child's schooling, through correspondence, newsletters and magazines,
- day-to-day administration of CAS,
- looking after students' educational, social and medical wellbeing,
- seeking donations and marketing for CAS and
- to satisfy CAS' legal obligations and allow CAS to discharge its duty of care.

Enrolment (or continued enrolment) and participation in some activities is dependent on the provision of specific personal information.

#### 4.7. Job applicants and contractors

The purposes for which CAS use personal information of job applicants and contractors include:

- assessing and (if successful) engaging the applicant or contractor,
- administering the individual's employment or contract,
- for insurance purposes,
- seeking donations and marketing for CAS,
- satisfying CAS' legal obligations, for example, in relation to child protection legislation.

#### 4.8. Volunteers

CAS also obtains personal information about volunteers who assist CAS in its functions or conduct associated activities, including CAS' Parent Committee and the Alumni Committee, to enable CAS and the volunteers to work together. This includes:

- to contact you about, and administer, the volunteer position,
- for insurance purposes and
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

#### 4.9. To whom CAS discloses personal information and how it is stored

CAS may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools. From time-to-time CAS will share student-related information with external schools and prescribed bodies under the provisions of The Children and Young Persons (Care and Protection) Act 1998, chapter 16.
- government departments (including for policy and funding purposes),
- medical practitioners,
- people providing educational, support and health services to CAS, including specialist visiting teachers, sports coaches, volunteers and counsellors,
- providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection, students with additional needs and for the purpose of administering Google Apps for Education and ensuring its proper use (see further the section below 'Sending and storing information overseas'),
- providers of assessment and learning tools,
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN),
- agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes,
- people providing administrative and financial services to CAS,

- the provider of our information management and storage system and other information technology services,
- recipients of Schools' publications, such as newsletters and the yearbook,
- the students' parents or carers,
- anyone an individual authorises CAS to disclose information to,
- anyone to whom CAS are authorised or are required by law (including child protection laws) to disclose information.

Personal information is collected by Campbelltown Anglican Schools (CAS) and is used within the organisation to facilitate business operations and the ongoing care and education of students. For continuity, personal information is accessible across the organisation (St Peter's and Broughton campuses and Central Office).

#### 4.10. Sending and storing information overseas

CAS stores personal information in hard copy and electronically. Where third party information management systems are used, personal information is accessible by the third party for the purpose of providing services to CAS.

CAS may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or tour. However, CAS 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.

Cloud service providers (e.g. Office365, EnrolHQ, TASS) are used to store personal information and to provide other services to CAS. Email, instant messaging and education and assessment applications require limited personal information to authenticate users for such services. Personal information used for this purpose may be stored in cloud servers which may be situated outside Australia.

Full privacy including disclosure statements can be found on these providers' websites.

#### 4.11. How does CAS treat sensitive information?

*Sensitive information* relates 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, or health information and biometric data concerning 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 agreement is obtained to extend these options, or the use or disclosure of the sensitive information is allowed by law.

#### 4.12. Management and security of personal information

CAS staff are required to respect the confidentiality of students', parents' and carers' personal information and the privacy of individuals.

CAS have in place steps to protect the personal information from misuse, interference, loss, unauthorised access, modification or disclosure. These include various methods of locked storage for paper records and passworded access, encryption, firewalls etc. for digital records.

#### 4.13. Access and correction of personal information

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information which CAS holds about them and to advise CAS of any perceived inaccuracy.

Students will generally be able to access and update their personal information through their parents and carers, but older students may seek access and correction themselves.

Some exceptions to this are set out in the Act.

To request access or to update any personal information please contact Student Services Centre in writing. Email [ssc@broughton.nsw.edu.au](mailto:ssc@broughton.nsw.edu.au) or [administration@stpeters.nsw.edu.au](mailto:administration@stpeters.nsw.edu.au).

- CAS may require verification of identity
- Individuals must specify the information required.
- CAS may charge a fee to cover the cost of verifying the applicant, locating, retrieving, reviewing and copying the requested material. Where the information sought is extensive, CAS will advise the likely cost in advance.
- If CAS cannot enable access to the requested information, a written notice explaining the reasons for refusal will be provided.

#### 4.14. Consent and rights of access to students' personal information

CAS respects every parent's and carer's right to make decisions concerning their child's education.

Generally, CAS will refer any requests for consent and notices in relation to the personal information of a student to the student's parents or carers. CAS will treat consent given by parents or carers as consent given on behalf of the student, and notice to parents or carers will act as notice given to the student.

CAS may, at their discretion, on the request of a student, grant that student access to information held by CAS about them or allow a student to give or withhold consent to the use of their personal information, independently of their parents or carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

#### 4.15. Enquiries and Complaints

Further information about the way CAS manages the personal information, or its adherence to the Australian Privacy Principles, please contact Central Services.

CAS will investigate complaints and will notify complainants of relevant decisions as soon as is practicable after the concern has been made.

## 5. Stakeholders

- Campbelltown Anglican Schools Council (The Council)
- all staff employed by The Council
- contracted staff
- students
- parents and carers
- visitors

## 6. Communication Plan and Visibility

- This policy can be accessed by staff through CAS-Central.
- It is publicly available on CAS websites

## 7. Ownership and approval of policy

This policy is the property of CASC and is to be approved by CASC.

## 8. Evaluation and Review

The policy will be reviewed annually by the CEO in partnership with CASC.

<b>Approving authority</b>	CASC
<b>Date reviewed</b>	03/02/2026
<b>Version number</b>	V2.3
<b>Summary of changes</b>	Section 4.5 rewritten to provide more detail.
<b>Next review (Date)</b>	03/02/2027
<b>Document Advisor (Name and title)</b>	Peter Lee – Risk, Compliance and Quality Assurance Manager Saif Samaan – ICT Manager Mikala Ryan – Risk and Compliance Officer

## 9. Definitions

All definitions can be found in CPo111 Definitions Policy.

## 10. Related documents

- Standard Collection Notice
- Media Release Forms
- CPo111 Definitions Policy

## 11. Appendices

Nil