

# SOUTH EASTERN INDEPENDENT SCHOOLS ASSOCATION

### PRIVACY POLICY

# 1. PURPOSE

South Eastern Independent Schools Association (SEISA) organises and administers interschool sport and cultural activities between its member schools. In the performance of this function, SEISA may collect and store the personal information of people who participate in our programs.

The purpose of this policy is to ensure that in the course of activities facilitated by SEISA, we manage and protect personal information in accordance with the Privacy Act 1988 (Cth) (PrivacyAct) and the 13 Australian Privacy Principles (APPs).

This policy outlines how SEISA collects, manages, and stores personal information.

# 2. THE KIND OF INFORMATION THAT WE COLLECT

SEISA may collect and hold personal information about:

- Staff at member schools
- Students enrolled at member schools
- Job applicants, staff, consultants/contractors

Information that we collect will only be collected if needed to carry out the operations of our association. Information collected and stored may include:

- Name
- Date of Birth/Age
- Gender
- School Name and year level
- Photographs/videos from SEISA events
- Working with Children Checks/VIT cards
- Bank details
- Email address
- Phone number
- Health (Accident/Illness) Information

# 3. HOW WE COLLECT AND HOLD YOUR PERSONAL INFORMATION

Personal information may be collected:

- Directly from students/staff/contractors
- By staff at member schools
- By SEISA Staff or member school staff (e.g. photographs at SEISA events).





SEISA may be provided with personal information without having sought it through our normal means of collection. This is known as "unsolicited information" and is often collected by:

- misdirected postal mail letters, notes, documents
- misdirected electronic mail emails, electronic messages
- employment applications sent to us that are not in response to an advertised vacancy
- additional information provided to us which was not requested.

Unsolicited information obtained by SEISA will only be held, used and or disclosed if itis considered as personal information that could have been collected by normal means. If that unsolicited information could not have been collected by normal means, then we will destroy, permanently delete or de-identify the personal information as appropriate.

### 4. HOW WE STORE AND REMOVE DATA

The Australian Privacy Principles (APP) state that there should be a clear and justifiable reason for collecting personal information, and that there should be an ongoing need for it. SEISA collects and stores personal information only when necessary. Any information collected is stored in a variety of formats including, but not limited to:

- Hard copy files
- Personal devices, including laptop computers
- third-party storage providers such as cloud storage facilities
- paper based files

SEISA takes all reasonable steps to ensure the protection of personal information that we hold from misuse, loss, unauthorised access, modification or disclosure.

In Australia, privacy policies require that personal information is destroyed or de-identified when it is no longer needed. SEISA is committed to reviewing information that is stored on a regular basis and ensuring.

All personal information will be de-identified or destroyed when no longer required for the operation of our association. The SEISA privacy officer will conduct regular audits of the information that is stored to ensure what is held is still required.

If the information is stored in a hard copy (such as a paper-based register of contact tracing information or printed copies of COVID-19 digital certificates), secure disposal might include methods such as secure shredding before recycling or throwing away.

If the information is stored electronically, such as in cloud-based storage, servers, USBs or with a third-party provider, SEISA will ensure that the digital records are permanently destroyed, including in any back-up system or offsite storage.

# 5. DISCLOSURE OF PERSONAL INFORMATION

Personal information is used for the purposes for which it was given to SEISA or for purposes which are directly related to one or more of our functions or activities.





Personal information may be disclosed to government agencies, other parents, other schools, recipients of SEISA publications, visiting teachers, counsellors and coaches, our service providers, agents, contractors, business partners, related entities and other recipients from time to time, if the individual:

- has given consent, or
- would reasonably expect the personal information to be disclosed in that manner.

SEISA may disclose personal information without consent or in a manner which an individual would reasonably expect if:

- We are required to do so by law.
- The disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety.
- Another permitted general situation applies.
- Disclosure is reasonably necessary for a law enforcement related activity.
- Another permitted health situation exists.

#### Disclosure of your personal information to overseas recipients

Personal information about an individual may be disclosed to an overseas organisation in the course of providing our services, for example when storing information with a "cloud service provider" which stores data outside of Australia.

Where this occurs, we will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- we have the individual's consent (which may be implied)
- we have satisfied ourselves that the overseas recipient is compliant with the APPs, or a similar privacy regime
- we form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety, or
- we are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

#### 6. PERMISSION TO PUBLISH

During SEISA events, and interschool co-curricular activities, SEISA staff and member school staff members may photograph, film or record students participating in events and activities. This record helps us celebrate student participation and achievement, record results and then share these with the broader SEISA community.





Before publishing personal information to social media or the SEISA website, SEISA staff will check with member schools regarding the permissions granted relating to individual students.

Images of staff and students will be collected using a variety of equipment that may include (but not limited to) video cameras, digital cameras and smartphones.

Images of staff and students may be used in publications that are accessible to the public via:

- SEISA website
- SEISA Social Media channels (including, but not limited to, Instagram, Facebook, Twitter and You Tube).

SEISA will use staff and student images reasonably, appropriately and sensitively, in accordance with any privacy and safety considerations.

Member schools are required to inform the SEISA staff/event manager when:

- students are participating in SEISA events and
- the student's parent/guardian has withdrawn consent for the school to use that student's image in photography/videography or other recordings.

# 7. WITHDRAWING CONSENT

If at any time a parent/guardian or student has any concern about the use of any images an email should be sent to the SEISA Executive Officer - <u>eo@seisa.com.au</u>

Please note however:

- If the images have already been published and are in the public domain, it may not be possible for consent to be withdrawn.
- There may be occasions when SEISA will photograph, film or otherwise record students at large group events (such as SEISA music) which are then made available to the SEISA community through shared online platforms (e.g. google drive). If you child participates in these events, they may appear in recordings.

### 8. HOW TO CONTACT US

SEISA can be contacted about this privacy policy by:

- Emailing our Privacy Officer, Pam Sellings <u>eo@seisa.com.au</u>
- Writing to our Privacy Officer, Pam Sellings, SEISA, C/- 150 Bowen St. Warragul, 3820.
- You can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information you need or provide the assistance you might otherwise receive.





### Policy status and review

The SEISA Executive is responsible for reviewing and updating this policy at least every two years.

# Approval

Created date	29 November 2024
Endorsed by	SEISA Principals
Endorsed on	29 November 2024
Next review date	29 November 2025

