The BUSY School Ltd

Privacy Policy

Purpose:	The BUSY School Ltd (School) is bound by the Australian Privacy Principles contained in the Commonwealth *Privacy Act*. This statement outlines the privacy policy of the School and describes how the School uses and manages personal information provided to or collected by it.		
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians/carers and students, contractors, and people visiting the School sites; and describes the type of information the School collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.		
Status:	Approved	Supersedes:	v4 (June 2023)
Authorised by:	Board Chair	Date of Authorisation:	January 2026
References:	• *Australian Privacy Principles* • *Privacy Act 1988* • The BUSY School (TBS) Child Protection Policy • TBS Student Code of Conduct • TBS Disability Discrimination Policy • Information Privacy Act 2009 (Qld) • Child Safe Organisations Act 2024 (Qld)		
Review Date:	Annually or as appropriate, to take account of new laws and technology, changes to School's operations and practices and to make sure it remains appropriate to the changing environment.		
		Next Review Date:	September 2026
Policy owner:	The BUSY School Ltd - Board of Directors		

Exception in Relation to Employee Records:

Under the *Privacy Act 1988* (Cth) (*Privacy Act*), the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to the School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and employee.

Policy

This Privacy Policy sets out how the School manages personal information provided to or collected by it. The School is bound by the Australian Privacy Principles contained in the *Privacy Act*. 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.

What kinds of personal information does the School collect and how does the School collect it?

The type of information the School collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents/carers before, during and after the course of a student's enrolment at the school, 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; and
  - photos and videos at School events.

- job applicants, employees, volunteers and contractors:
  - 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 and/or allergies, and 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 the school including name and contact details and any other information necessary for the particular contact with the school.

Personal information is only collected:

- if necessary for the school operations
- by lawful and fair means
- where practicable, only from the individual concerned

The School takes all reasonable steps to ensure that you are aware of the following provisions:

- the likely use of the information
- the right of access to the information
- the identity and contact details of the organisations
- any law requiring collection of the information; and
- the main consequences of failure to provide the information

How we collect personal information

Personal Information you provide:

The School 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. On occasions people other than parents/carers and students provide personal information.

Personal Information provided by other people:

In some circumstances the School may be provided with personal information about an individual from a third party, for example a report provided 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.

Personal information from other sources:

We may also collect personal information through surveillance activities (such as CCTV security cameras) and student email monitoring.

Purposes for which we collect, use and disclose personal information

The purposes for which the School collects, uses and discloses personal information depend on our relationship with the person and include the following:

Students and parents/carers:

- providing schooling and school activities;
- satisfying the needs of parents/carers, the needs of students and the needs of the school throughout the whole duration a student is enrolled at the School;
- making required reports to government authorities;
- keeping parents/carers informed about matters related to their young person's schooling through correspondence, apps, newsletters and magazines;
- day-to-day administration of the School;
- looking after students' educational, social and health wellbeing;
- seeking donations for the School (see the 'Fundraising' section of this Privacy Policy); and
- to satisfy the school's legal obligations and allow the school to discharge its duty of care.
- In some cases where the School requests personal information about a student or Parent/Carer, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

Volunteers:

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

Job applicants and contractors:

- assessing and (if successful) engaging the applicant or contractor;
- administering the individual's employment or contract;
- seeking donations for the School (see the 'Fundraising' section of this Privacy Policy);
- for insurance purposes; and
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

Who we disclose personal information to

The School may disclose personal information, including sensitive information, for educational, care and administrative purposes, and to seek support and advice. This may include to:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the school, including specialist visiting teachers, volunteers, and counsellors;
- organisations that assist us with fundraising (see the 'Fundraising' section of this Privacy Policy);
- 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 Microsoft Apps for Education and ensuring its proper use (see further the section below 'Sending and storing information overseas);

- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA);
- 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 the school;
- the provider of our information management and storage system and other information technology services;
- recipients of School publications, such as newsletters and magazines;
- students' parents/carers;
- anyone the person authorises the school to disclose information to; and
- anyone to whom TBS is required or authorised to disclose the information to by law, including child protection laws.

How we store personal information

The BUSY School stores personal information in hard copy and electronically. The School uses information management and storage systems provided by third party service providers. Personal information is stored with and accessible by the third-party service providers for the purpose of providing services to the School in connection with the systems.

The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information. See further the section below 'Sending and storing information overseas.'

Sending and Storing Information Overseas

The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a School exchange. However, the School 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)

The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve 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.

An example of such a cloud service provider is Microsoft 365, providing email and document editing apps, and stores and processes limited personal information for this purpose. School personnel and service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering Microsoft 365 and ensuring its proper use.

The School uses the 'Compass' school and student management system (Compass Education Pty Ltd) as the comprehensive data management system covering all enrolments, attendance, absences, student, parent/carer and staff records, reporting, communication and a wide range of other School functions. The robustness, reliability and commercial reputation of Compass ensures the integrity and security of the data and documents it holds and the security of the system with the School will be maintained by having regular and frequent system backups maintained in off-site ('cloud') storage. Compass Education Pty Ltd acknowledge the School retains ownership rights on all of our content but the Compass system is responsible for storage of the content and maintenance and support. The Compass Group comprises of entities across Australia, Canada, the UK and the European Economic Area (EEA) and as such data in relation to any support or maintenance request may be processed outside of Australia or the EEA.

Sensitive Information

In referring to 'sensitive information', the School means: information relating 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, that is also personal information; health information and biometric information about 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 you agree otherwise, or the use or disclosure of the sensitive information is required by law.

Fundraising and Marketing

The School treats seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to provide a quality learning environment in which both students and staff thrive. Personal information may be used to make an appeal to a person.

If a person does not want to receive fundraising communications or The BUSY School, please contact our Risk and Compliance (Privacy) Officer.

Security of personal information

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

These steps include:

- Restricting access to information on the School databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- Implementing physical security measures around the School buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implementing human recourses policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Data Breaches

It will be deemed that an 'eligible data breach' at the School has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (the affected individuals)
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result
- the information is lost in circumstances where:
    - unauthorised access to, or unauthorised disclosure of, the information is likely to occur
    - assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

What must the School do in the event of an 'eligible data breach'?

If the School suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then the School will be required to lodge a statement to the Office of the Australian Information Commissioner (Commissioner). Where practical to do so, the School entity will also notify the affected individuals. If it is not practicable to notify the affected individuals, the School will publish a copy of the statement on its website or publicise it in another manner.

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

Access and Correction of Personal Information

Under the *Privacy Act*, an individual has the right to seek and obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents/carers, but older students may seek access and correction themselves.

To make a request to access or to update any personal information the School holds about a parent/carer or student, the person contacts the Campus Principal in writing. The School may require a person to verify their identity and specify what information is required. The School may charge a reasonable fee for giving access to your personal information (but will not charge for the making of the request or to correct your personal information). If the information sought is extensive, the School will advise the likely cost in advance.

If TBS decides to refuse the request, TBS provides a written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.

Consent and Rights of Access to the Personal Information of Students

The School respects every parent's/carer's right to make decisions concerning their young person's education.

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/carers. the School will treat consent given by parents/carers as consent given on behalf of the student, and notice to parents/carers will act as notice given to the student.

As mentioned above, parents/carers may seek access to personal information held by the School about them or their young person by contacting the Campus Principal. However, there will be occasions when access is denied. Such occasions may include (but are not limited to) where the School believes the student has capacity to consent and the School is not permitted to disclose the information to the parent/carer without the student's consent, where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the School's duty of care to the student.

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/carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Withdrawal of Consent to Release of Personal Information

TBS employees will ensure that;

- students are informed of their right to withdraw their consent to release information at any time
- the process for withdrawal of consent be easy and accessible (i.e. verbal or in writing to an authorised TBS employee)
- the student is informed of the possible consequences of withdrawing their consent i.e. there may be limitations to the provision of services
- once student has withdrawn consent the organisation cannot rely on the student's past consent for any future use or disclosure of personal information

Enquiries and Complaints

If you would like further information about the way the School manages the personal information it holds, or wish to make a complaints about the School's breach of the Australian Privacy Principles contact the Campus Principal either via phone, email or mail at the relevant campus address (https://www.busyschools.qld.edu.au/contacts/). In line with The BUSY School Complaints Handling Policy and Complaints Handling Procedure, the School will investigate any complaint and will notify the complainant of the decision in relation to the complaint as soon as is practicable after it has been made.

If a person is not satisfied with the response from TBS, a complaint can be made to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

Privacy contact details

All information about privacy issues can be forwarded to:

The BUSY School Risk and Compliance Officer- Email: schoolprivacy@busyschools.com.au

Version Control

Version no.	Date Effective	Approved by	Changes
1.0	September 2020	▪ Approved by TBS Board of Directors	▪ Initial draft version
2.0	September 2021	▪ Endorsed by TBS Governance, Compliance and Strategy Committee ▪ Approved by TBS Board of Directors	▪ Aligned to ISQ template ▪ Removed reference to NAPLAN ▪ Added alumni section ▪ Version control/Formatting
3.0	September 2022	▪ Endorsed by TBS Governance, Compliance and Strategy Committee ▪ Approved by TBS Board of Directors	▪ Reviewed against ISQ template ▪ Updated terminology aligning to School operations and policies / procedures ▪ Added new email address ▪ Formatting/Grammar/Version control
4.0	June 2023	▪ Endorsed by TBS Governance, Compliance and Strategy Committee ▪ Approved by TBS Board of Directors	▪ Updated to reflect ISQ Privacy Compliance Manual ▪ Formatting/Grammar/Version control
5.0	January 2026	▪ Endorsed by TBS Governance, Compliance and Strategy Committee ▪ Approved by TBS Board of Directors	▪ Reviewed against recent regulatory changes and subsequent requirements

Appendix 1

Standard Collection Notice

The BUSY School (School) collects personal information, including sensitive information about students and parents, guardians or carers before and during the course of a student's enrolment at the School. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the School to provide schooling to students enrolled at the School, exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School.

Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.

Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.

Health information about students is sensitive information within the terms of the Australian Privacy Principles (APPs) under the *Privacy Act* 1988. We may ask you to provide medical reports about students from time to time.

The School may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:

- other schools and teachers at those schools;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the School, including specialist visiting teachers, coaches, volunteers, and counsellors;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and the Queensland Curriculum and Assessment Authority (QCAA)
- people providing administrative and financial services to the School;
- anyone you authorise the School to disclose information to; and
- anyone to whom the School is required or authorised by law, including child protection laws, to disclose the information.

Personal information collected from students is regularly disclosed to their parents, guardians or carers.

The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve 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 reside on a cloud service provider's servers which may be situated outside Australia.

The BUSY School's Privacy Policy, accessible on the School's website, sets out how parents, guardians, carers or students may seek access to and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as 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 a student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.

The BUSY School's Privacy Policy also sets out how parents, guardians, carers and students can make a complaint about a breach of the APPs and how the complaint will be handled.

The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.

On occasions information such as student academic and sporting achievements, student activities and similar news is published in the School's newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, School camps and School excursions. The School will as far as reasonably practicable obtain permissions upon enrolment from the student's parent, guardian or carer (and from the student if appropriate) if we would like to include such

photographs or videos or other identifying material in our promotional material or otherwise make this material available to the public such as on the internet.

We may include students' and students' parents', guardians' or carers' contact details in a class list and School directory.

If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why.

APPENDIX 2

Alumni Association Collection Notice

1. The BUSY School (School) Alumni Association may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of the School and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your involvement with the School as alumni.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the School to assist in its fundraising activities. If you do not agree to this, please advise us now.
4. The School may publish details about you in publications and on our website. If you do not agree to this, you must advise us now.
5. The BUSY School's Privacy Policy, accessible on the website (www.busyschools.qld.edu.au) contains details of how you may seek access to and correction of your personal information which the School has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. 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 reside on a cloud service provider's servers which may be situated outside Australia.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

APPENDIX 3

Employment Collection Notice

1. In applying for this position, you will be providing The BUSY School (School) with personal information. We can be contacted via phone on 1300 176 472 or email: privacy@busyschools.com.au.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The BUSY School's Privacy Policy, accessible on the school's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted.
5. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. The school may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. 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 reside on a cloud service provider's servers which may be situated outside Australia.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the school and why.

APPENDIX 4

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to The BUSY School (School), you will be providing the School with personal information. We can be contacted via phone on 1300 176 472 or email privacy@busyschools.com.au.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for seven years.
4. The BUSY School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
5. We will not disclose this information to a third party without your consent unless otherwise permitted to.
6. We are required to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect other personal information about you in accordance with these laws.
7. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve 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 reside on a cloud service provider's servers which may be situated outside Australia.
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.