KINCOPPAL – ROSE BAY
SCHOOL OF THE SACRED HEART

New South Head Road
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CRICOS Provider Code 02268M ABN 47 003 942 603

PRIVACY POLICY

Document Management

Legal and Regulatory Basis	Australian Privacy Principle 1 and applicable NSW health privacy requirements
Relevant to	Students, parents and guardians, prospective families, staff, job applicants, volunteers, contractors, alumni, donors and other members of the School community
Publication Location	Staff portal and KRB website A copy may also be made available in another appropriate form on request.
Version	Draft for approval
Date of Introduction	May 2014
Modification History	March 2015; May 2016; July 2018; May 2021; June 2026; October 2026 rewrite
Reviewed by	Governance and Risk Manager
Approved by	Governance, Risk and Safeguarding Committee
Review Cycle	This Policy is reviewed periodically and may be updated to reflect changes in law, regulatory guidance, technology, School operations or information-handling practices.
Related Documents	Information Collection Notices and other relevant School policies and notices as published by KRB from time to time.
Related Legislation	Privacy Act 1988 (Cth), including the Australian Privacy Principles and the Notifiable Data Breaches scheme; Health Records and Information Privacy Act 2002 (NSW), where applicable.

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1. Purpose

Kincoppal-Rose Bay School of the Sacred Heart (**'KRB' or 'the School'**) collects, holds, uses and discloses personal information in connection with its educational, pastoral, administrative, employment and operational activities.

This Policy explains generally:

- the kinds of personal information KRB may collect and hold;
- how KRB collects, uses and discloses personal information;
- how individuals may access or correct personal information;
- how privacy enquiries or complaints may be made; and
- whether personal information is likely to be disclosed overseas.

KRB manages personal information in accordance with applicable privacy laws.

This Policy is intended to provide a general overview of how KRB manages personal information. Additional information collection notices and privacy statements may apply to particular activities, services, platforms or programs operated by the School.

2. Scope and key terms

2.1 This Policy applies to personal information KRB holds about students, prospective students, parents and guardians, prospective families, job applicants, volunteers, contractors, alumni, donors and other people who interact with the School.

2.2 It also applies to personal information about current and former employees to the extent that the Privacy Act or another applicable law applies to that information. Some acts and practices relating directly to an employment relationship and an employee record may be exempt from the Australian Privacy Principles.

2.3 The definitions below are summaries only. Applicable legislation governs their legal meaning.

Type of Information	Description
Personal	is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information is true and whether or not it is recorded in a material form.
Sensitive	is a category of personal information that includes information about racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices, criminal record, health information and certain biometric information.
Health	is sensitive information about an individual's health, disability, injury, health services or wishes concerning future health services, and

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	personal information collected in providing a health service.

3. Privacy Policy

3.1 Open and Transparent Management

3.1.1 KRB takes reasonable steps to maintain practices, procedures and systems that support compliance with applicable privacy laws and enable privacy enquiries and complaints to be considered.

3.1.2 This Policy is available on the KRB website. A copy may be provided in another appropriate form on request.

3.1.3 KRB may amend this Policy from time to time. The current version published on the KRB website applies.

3.2 Kinds of Personal Information Collected

3.2.1 The School collects personal information reasonably necessary for its educational, pastoral, administrative, employment, fundraising, legal and operational functions. Depending on the circumstances, this may include identity and contact information, educational records, health information, financial information, employment-related information, security information, communications and other information reasonably required to support students, families, staff and the School's operations.

3.2.2 Depending on the person and the circumstances, this may include:

3.2.2.1 identity, contact, family, enrolment and emergency information

3.2.2.2 educational, attendance, assessment, behaviour, wellbeing and learning-support information

3.2.2.3 health, disability, counselling, safety and other sensitive information

3.2.2.4 financial, fee, payment, fundraising, alumni and community information

3.2.2.5 employment, recruitment, volunteer, contractor and professional information

3.2.2.6 information generated through authorised technology systems used by KRB.

3.3 How Personal Information is Collected

3.3.1 The School generally collects personal information directly from the individual or, for a student, from the student's parent or guardian. Information may be collected through forms, applications, interviews, meetings, telephone calls, emails, websites, portals, approved platforms, School activities and School systems.

3.3.2 The School may also collect personal information from third parties where lawful and reasonable, including previous schools, referees, medical and allied health

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practitioners, government agencies, regulators, service providers, contractors and people authorised to provide information.

3.3.3 Where KRB receives personal information that it did not request, KRB will handle that information in accordance with applicable privacy laws.

3.4 Website Use and Analytics

3.4.1 When individuals visit KRB's website, certain information may be collected automatically through cookies and similar technologies. This information may include browser type, device information, pages viewed, date and time of access and website usage patterns. KRB uses this information to operate, maintain, improve and secure its website and digital services. Individuals can manage cookie preferences through their browser settings. Some website functions may not operate as intended if cookies are disabled.

3.5 Purposes of Collection, Use and Disclosure

3.5.1 The purposes for which the School collects, holds, uses and discloses personal information depend on the School's relationship with the individual. They include:

- 3.5.1.1 providing education, co-curricular activities, boarding services where applicable and related School programs
- 3.5.1.2 supporting student learning, wellbeing, health, safety, pastoral care and participation
- 3.5.1.3 meeting duty of care, child protection, public health and emergency management obligations
- 3.5.1.4 administering enrolment, attendance, assessment, reporting, discipline, complaints and School operations
- 3.5.1.5 communicating with students, parents, guardians, staff and the wider School community
- 3.5.1.6 recruiting, engaging and managing staff, volunteers and contractors
- 3.5.1.7 meeting legal, regulatory, registration, funding, taxation, insurance and reporting obligations
- 3.5.1.8 managing incidents, investigations, complaints, risk, insurance claims and legal matters
- 3.5.1.9 supporting alumni relations, advancement, community engagement, events and fundraising
- 3.5.1.10 operating and securing technology, information systems and business continuity arrangements
- 3.5.1.11 planning, quality assurance, audit, research and improvement activities, using de-identified or aggregated information where practicable

3.5.2 If personal information requested by KRB is not provided, KRB may be unable to provide a service, process an application, support participation in an activity or otherwise deal with the individual as requested.

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3.6 Use and Disclosure

3.6.1 The School will generally use or disclose personal information for the primary purpose for which it was collected. It may also use or disclose information for a related secondary purpose that the individual would reasonably expect, with consent, or where otherwise permitted or required by law. For sensitive information, the secondary purpose must be directly related to the primary purpose.

3.6.2 Where reasonably necessary and lawful, personal information may be disclosed to:

- 3.6.2.1 government departments, regulators, education authorities and funding bodies
- 3.6.2.2 other schools, including when a student transfers
- 3.6.2.3 medical practitioners, allied health providers, counsellors and wellbeing professionals
- 3.6.2.4 service providers supporting learning, assessment, enrolment, administration, finance, communications, information technology, security and School operations
- 3.6.2.5 contractors, coaches, volunteers, specialist staff, consultants and professional advisers
- 3.6.2.6 insurers, legal advisers, auditors and other advisers
- 3.6.2.7 organisations assisting with alumni, advancement, fundraising, publications and School events
- 3.6.2.8 parents or guardians, subject to the student's welfare, maturity, privacy and applicable legal requirements
- 3.6.2.9 a person authorised by the individual
- 3.6.2.10 a person or body to whom disclosure is required or authorised by law

3.6.3 KRB does not sell personal information.

3.7 Students, Parents and Guardians

3.7.1 The School will usually communicate with parents and guardians and share information about a student so it can support the student's education, wellbeing and safety. The School may limit or withhold information where required or permitted by law, where disclosure may affect the safety, welfare or privacy of the student or another person, or where the School considers that the student has sufficient maturity and capacity, and disclosure without the student's consent would not be appropriate or permitted.

3.7.2 The School will generally direct notices and consent requests concerning a younger student to the student's parent or guardian. Privacy law recognises that, depending on age and maturity, a student may be capable of making certain decisions regarding their personal information. The School may allow an older or sufficiently mature student to give or withhold consent, seek access or request correction independently, having regard to the student's age, maturity, circumstances, welfare and applicable law.

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3.8 Sensitive and Health Information

3.8.1 The School will collect sensitive information, including health information, only with consent or where collection is otherwise permitted or required by law. It will use and disclose sensitive information only for the purpose for which it was collected, a directly related purpose that would reasonably be expected, with consent, or where otherwise permitted or required by law.

3.8.2 Access to sensitive and health information will be limited to people who need the information for an authorised purpose. Additional safeguards may be applied according to the sensitivity of the information and the potential harm that could arise from misuse or disclosure.

3.9 Counselling and Wellbeing Records

3.9.1 KRB may collect and hold counselling, pastoral care, wellbeing, health and safeguarding information concerning students.

3.9.2 Students and, where appropriate, parents or guardians may be informed about how information associated with a counselling or wellbeing service is handled, including relevant limits on confidentiality.

3.9.3 KRB may use or disclose counselling or wellbeing information with consent, for an appropriately related purpose, to support a student's health, safety or welfare, or where otherwise permitted or required by law.

3.9.4 Where an external provider delivers a service, that provider may also have separate privacy obligations and may provide its own privacy information.

3.10 Surveillance and Digital Monitoring

3.10.1 KRB may use CCTV, access-control systems and authorised monitoring of School devices, systems, networks, email and internet use for purposes including safety, security, safeguarding, system administration, acceptable use, incident management, investigation and legal compliance.

3.10.2 Surveillance and monitoring will be undertaken in accordance with applicable law. Where required, KRB will provide notice through relevant policies, notices, signage, contracts or other communications.

3.10.3 Further information about particular surveillance or monitoring activities may be provided separately.

3.11 School Community Directories, Photographs and Publications

3.11.1 KRB may collect and use photographs, video or audio recordings, student work, names, achievements and other information for educational, administrative, archival, community, communication and publication purposes.

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3.11.2 KRB may provide notices, seek consent or offer choices concerning particular uses where required by law or considered appropriate by the School.

3.11.3 Individuals may contact KRB about a current permission, preference or concern. KRB will consider such requests having regard to applicable law, existing publications, contractual arrangements, technical limitations and the circumstances of the proposed use.

3.11.4 KRB may prepare class lists, directories or similar materials for authorised School community purposes. Information included in those materials may be limited or omitted where required by law or considered appropriate by KRB.

3.12 Sharing with Other Schools and Disclosures Required or Authorised by Law

3.12.1 KRB may disclose personal information to another school where reasonably necessary to facilitate a transfer, support a student's education, health, safety or welfare, or otherwise perform KRB's functions, provided the disclosure is permitted or required by law.

3.12.2 KRB may also use or disclose personal information where permitted or required by legislation, a court or tribunal order, or another applicable legal obligation or authority.

3.13 Fundraising and Direct Marketing

3.13.1 KRB may use personal information to communicate about School activities, events, alumni engagement, community programs, advancement and fundraising.

3.13.2 KRB may also disclose limited personal information to service providers engaged to assist with those activities.

3.13.3 Where required by law, a direct marketing communication will include a means of requesting that similar communications cease. A person may contact KRB using the details in this Policy to update their communication preferences.

3.13.4 KRB will comply with applicable laws relating to electronic communications and direct marketing.

3.13.5 A request to stop receiving marketing or fundraising communications will not necessarily apply to communications concerning education, student wellbeing or safety, enrolment, employment, administration, contractual matters or legal obligations.

3.14 Artificial Intelligence Technology

3.14.1 KRB may use artificial intelligence (AI) and other technology tools to support teaching and learning, administration, communication, security and School operations. Where personal information is handled through these tools, KRB will

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manage that information in accordance with applicable privacy laws and appropriate safeguards. KRB does not currently use AI systems as the sole basis for making decisions that significantly affect an individual's rights or interests.

3.15 Storage, Cloud Services and Overseas Disclosure

3.15.1 KRB holds personal information in physical and electronic form, including through service providers that support educational, administrative, communication, security and other School functions.

3.15.2 KRB may use cloud-based or technology service providers that store or process personal information outside Australia. Where personal information is disclosed overseas, KRB will take reasonable steps required by applicable privacy law, including APP 8 where applicable.

3.16 Privacy and Data Breaches

3.16.1 A privacy or data breach may involve the loss of, unauthorised access to, or unauthorised disclosure of personal information. KRB takes privacy and information security incidents seriously. If KRB becomes aware of an actual or suspected privacy or data breach, it will assess and respond to the incident in accordance with applicable privacy laws and relevant School procedures. Where required by law, KRB will notify affected individuals and relevant regulators, including under the Notifiable Data Breaches scheme.

3.17 Security, Data Quality and Government Identifiers

3.17.1 KRB takes reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure, having regard to the nature of the information, the circumstances in which it is held and applicable legal requirements.

3.17.2 KRB also takes reasonable steps to ensure that personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

3.17.3 Individuals are encouraged to notify KRB if they believe personal information held about them is inaccurate or requires updating.

3.17.4 KRB handles government-related identifiers in accordance with applicable law and does not adopt a government-related identifier as its own identifier unless permitted by law.

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3.18 Anonymity and Pseudonymity

3.18.1 Where required by the Australian Privacy Principles, KRB will provide individuals with the option of not identifying themselves or of using a pseudonym when dealing with the School.

3.18.2 This option may not be available where KRB is required or authorised by law to deal with an identified individual, or where it is impracticable for KRB to deal with a person who has not identified themselves.

3.18.3 In many circumstances, including enrolment, student care, employment, payments, contractual dealings, access or correction requests and the investigation of complaints, KRB will need to know the individual's identity.

4. Access and Correction

4.1 An individual may request access to personal information KRB holds about them or request correction of information they believe is inaccurate, out of date, incomplete, irrelevant or misleading.

4.2 Requests should be directed to the Privacy Officer using the contact details in this Policy. KRB may request information reasonably necessary to verify identity, locate the relevant records and assess the request.

4.3 KRB will respond within the period required by applicable law or, where no specific period applies, within a reasonable period.

4.4 Access may be provided in an appropriate form. KRB may refuse or limit access or correction where permitted or required by law. Where required, KRB will provide written reasons and information about available complaint mechanisms.

4.5 Fees may apply where permitted by law. KRB will advise the requester before imposing a fee.

5. Privacy Complaints

5.1 Privacy enquiries and complaints may be directed to the Privacy Officer using the contact details in this Policy.

5.2 To assist KRB to consider a complaint, the person should provide sufficient information to identify the matter and the outcome sought. KRB may request further information where reasonably necessary.

5.3 KRB will consider the complaint and respond within the period required by applicable law or otherwise within a reasonable period.

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5.4 If the person is not satisfied with KRB's response, they may be entitled to contact the Office of the Australian Information Commissioner, the NSW Privacy Commissioner or another regulator with jurisdiction.

6. Contact Details

6.1 Privacy enquiries, access requests, correction requests and privacy complaints may be directed to:

Privacy Contact	Privacy Officer
School	Kincoppal-Rose Bay School of the Sacred Heart
Email	privacy@krb.nsw.edu.au
Phone	(02) 9388 6000 - ask for the Head of Junior School or Head of Senior School where the matter concerns a current student
Website	www.krb.nsw.edu.au
Policies	https://www.krb.nsw.edu.au/about-us/our-policies/