



OLD GRAMMARIANS' ASSOCIATION (OGA) PRIVACY POLICY

MARCH 2014

Personal Information is information that identifies an individual or could identify an individual. A name or address is an obvious example. In some cases, a date of birth and post code may be enough to identify an individual. Personal information can include, but is not limited to, medical records, bank account details, photographs, videos and information about where the individual works.

What kinds of personal information does the OGA collect and hold?

The type of personal information, including sensitive information, that the OGA collects and holds, is that which is necessary or directly related to the OGA's primary function of promoting unity and good fellowship amongst OGA members, furthering the interests and prosperity of the School and enhancing the operation of the School.

For former students and families this includes name, address and contact details, and other information that may be provided unsolicited by the individual such as change of marital status or occupation. For parents/guardians this includes names and contact details. For staff members this includes address, contact details for themselves. For volunteers and contractors this includes names, contact and company details, mandatory registrations and in some instances bank account details.

How the OGA collects personal information.

The OGA will generally collect personal information held about an individual by way of forms filled out by parents or students, staff members, or by face-to-face meetings and interviews, telephone calls, email communications and/or via the Bunbury Cathedral Grammar School website and portal. In some circumstances the OGA may be provided with personal information about an individual from a third party. Unless verified, reliance will not be made upon information so received.

How the OGA treats sensitive information.

In referring to 'sensitive information', this includes, but is not limited to, information relating to a person's racial or ethnic origin, political affiliations, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, and health information about an individual, that is also personal information.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the individual agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

How the OGA holds personal information.

The OGA's Committee and Bunbury Cathedral Grammar School OGA officers are required to respect the confidentiality of personal information and the privacy of individuals.

The OGA holds personal information provided by individuals in one, or both, of two formats. The first is the format in which the information was provided, whether this is via a School form, an email, letter, school website/portal communication or a recorded phone message. The second format is within the OGA's Information Management System, Synergetic. Hard copies of personal information are held on personal files, or files created for specific information management purposes. These are secured in controlled access areas.

Access to personal information entered into Synergetic is controlled by password access and security levels assigned to each staff member. The level of access for each staff member is determined by their role within the OGA and their operational requirement to know specific personal information about an individual.

The purpose for which the OGA collects, holds, uses and discloses personal information

The OGA will use personal information it collects from the individual for the primary purpose of promoting unity and good fellowship amongst OGA members, furthering the interests and prosperity of the School and enhancing the operation of the School, and for such other reasonably expected related secondary purposes, or for which the individual has consented. These purposes include informing OGA members about our activities and the activities of Bunbury Cathedral Grammar School and to keep OGA members informed about other members.

In relation to personal information, the OGA's primary purpose of collection is to enable the OGA to continue OGA membership.

The purposes for which the OGA may use the personal information of OGA members and their parents/guardians include:

- to keep OGA members informed about OGA and Bunbury Cathedral Grammar School matters through reunion invitations, correspondence, newsletters, magazines and the OGA's website;
- day-to-day administration;
- seeking donations and marketing for the OGA and/or Bunbury Cathedral Grammar School and to assist with fundraising activities;
- to satisfy the OGA's legal and legislative obligations;
- to publish details about and photos of OGA members in the Grammarian Magazine or on the digital media sites of the OGA and/or Bunbury Cathedral Grammar School;
- to maintain and publish an OGA list or directory.

The OGA provides the opportunity in all written communication, for individuals to opt out of the publication of their personal details and/or image in any form whatsoever.

In some cases where the OGA requests personal information about an OGA member, if the information requested is not obtained, the OGA may not be able to continue the membership of the individual.

Contractors

In relation to personal information of contractors, the OGA's primary purpose of collection is to assess and engage the contractor. The purpose for which the OGA uses personal information of contractors includes:

- administering the individual's contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for the OGA;
- to satisfy the OGA's legal obligations.

Volunteers

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

Marketing and Fundraising

The OGA treats marketing and seeking donations for the future growth and development of the OGA, as an important part of ensuring that the OGA continues to function well and promote the objects of the OGA. Personal information held by the OGA may be disclosed to an organisation that assists in fundraising on behalf of the OGA or Bunbury Cathedral Grammar School and its Foundation.

The OGA provides the opportunity in all written communication, for individuals to opt out of any fundraising or solicitation marketing.

To whom might the OGA disclose personal information?

The OGA may disclose personal information, **not** including sensitive information, held about an individual to:

- other OGA members
- anyone the individual or parent/guardian authorises the OGA to disclose information to.

How an individual may access personal information about the individual that is held by the OGA and seek the correction of such information.

An individual has the right to obtain access to any personal information which the OGA holds about them and to advise the OGA of any perceived inaccuracy. There are some exceptions to this right, as set out in the Australian Privacy Principles. The OGA may require the individual to verify their identity and specify what information they require. The OGA may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the OGA will advise the likely cost in advance. OGA Members, volunteers and contractors may seek access to their personal information by contacting the President of the OGA in writing.

The OGA is required to respond to a request for access to personal information within 30 days of the request or within a reasonable period after the request is made. The OGA may, under certain circumstances, refuse to give access to personal information as requested or to give access in the manner requested by the individual. If this occurs, the OGA must give the individual a written notice that states the reason for the refusal and the mechanisms available to the individual to complain about the refusal and any other related matter prescribed by the regulations.

Correction of personal information

If under the Australian Privacy Principles the OGA believes that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading or the individual requests the OGA to correct the information, the OGA must take such steps as reasonable in the circumstances to correct the information.

The OGA endeavours to ensure that the personal information it holds is accurate, complete, up-to-date and relevant. The OGA annually requests that individuals confirm or update critical personal information. In addition a person may seek to update their personal information held by the OGA, at any time, by contacting the Administration Office of the OGA or via the OGA's parent portal. Contractors can contact the President of the OGA. The OGA is required to respond to a request to correct personal information within 30 days of the request or within a reasonable period after the request is made.

The OGA may, under certain circumstances, refuse to correct personal information as requested by the individual or, their parent/guardian if the individual is a student. If this occurs, the OGA must give the individual a written notice that states the reason for the refusal and the mechanisms available to the individual to complain about the refusal and any other related matter prescribed by the regulations.

Is the OGA likely to disclose personal information to overseas recipients?

The OGA is unlikely to disclose personal information to overseas recipients. In the occurrence of such situation, the OGA would endeavour to:

- obtain the consent of the individual (in some cases this consent will be implied); or
- otherwise comply with the Australian Privacy Principles which requires the OGA to take such steps as are reasonable in the circumstances to ensure any overseas recipient of personal information does not breach the Australian Privacy Principles. The OGA accepts this requirement and will also seek the prior consent of the individual as appropriate should a disclosure of personal information to an overseas recipient be required.

How an individual may complain about a Breach of the Australian Privacy Principles that bind the OGA, and how the OGA will deal with such a complaint.

Any complaint relating to the OGA's compliance with the Australian Privacy Principles must be addressed in writing directly to the President of the OGA. Such matters may include, but not be limited to, the OGA's refusal to provide access to an individual's personal information or refusal to correct an individual's personal information.

If the individual is not satisfied with the outcome offered by the OGA, the individual may make a complaint to the Australian Information Commissioner under section 36 of the Privacy Act.

Additional information on the Australian Privacy Principles and the Office of the Australian Information Commissioner is available at www.oaic.gov.au.