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### 1. Introduction

This Privacy Policy sets out how Australian Boarding Schools International ('**ABSI**') manages personal information provided to or collected by it, and how to contact us if you have any privacy concerns.

ABSI is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth).

Some parts of this privacy policy will apply to personal information held by ABSI about its employees to a limited extent.

# 2. What kinds of personal information does ABSI collect?

ABSI will collect different types of personal information from you, depending on how you interact with us. The type of information ABSI collects and holds includes (but is not limited to) personal information about:

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at ABSI;
- job applicants, staff members, volunteers and contractors; ABSI schools and
- other people who come into contact with ABSI.

The types of personal information ABSI collects may include your name, contact details and financial details, as well as information about schools that have appointed ABSI.

ABSI will only collect sensitive information (which is a category of personal information that includes information about things like an individual's health, religious beliefs, criminal record and racial or ethnic origin) from an individual with their <u>consent</u> and where reasonably necessary for one of ABSI's or an ABSI school's requirements/functions.

ABSI may collect personal information because we are required or authorised by an Australian law or court or tribunal order to do so. ABSI will tell you if this is the case and let you know the details of the law, court or tribunal order.

### 2.1. Personal Information you provide

ABSI will generally collect personal information directly from the individual such as through the completion of forms by Parents or students, completion of application forms for prospective staff, face-to-face meetings and interviews, emails and telephone calls, and documentation between ABSI and a school.

### 2.2. Personal Information collected from third parties

ABSI may collect information about a student from their Parent(s). In some circumstances, ABSI may collect 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 report about an individual's use of School devices.

### 2.3. Anonymity

If it is lawful and practicable to do so, ABSI may offer individuals the opportunity of dealing with ABSI anonymously or by using a pseudonym, such as when an individual makes a general inquiry about ABSI. However, in some cases where ABSI requests personal information about a student or Parent, if the information requested is not provided, ABSI may not be able to enrol or continue the enrolment of the student, or permit the student to take part in a particular activity.



# 3. How will ABSI use the personal information you provide?

ABSI will use personal information it collects from you for the primary purpose of collection, and generally for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

### 3.1. Students, Parents, ABSI schools

In relation to personal information of students and Parents, ABSI's primary purpose of collection is to enable enrolment consideration for the student. This includes satisfying the needs of Parents, the needs of the student and the needs of an ABSI School throughout the whole period the student is enrolled at a school. The purposes for which ABSI collects, uses, holds and discloses personal information of students and Parents include:

- to provide information to an ABSI school for the purposes of enrolment consideration;
- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- o looking after students' educational, social and medical wellbeing;
- to enable past pupils to be in contact with those from their year group via alumni events / communications;
- to enable and conduct Year Group reunions as required overseas on behalf of the ABSI school/s; and
- to satisfy the ABSI's legal obligations and allow ABSI to discharge its duty of care.

#### 3.2. Volunteers

ABSI also collects, uses, holds and discloses personal information about volunteers who assist ABSI in its functions or conduct associated activities, such as alumni associations, to enable ABSI and the volunteers to work together.

### 3.3. Marketing

ABSI treats marketing and development of ABSI as an important part of ensuring that families and education agencies globally, continue to provide a up-to-date information about each ABSI school choice.

### 3.4. Prospective staff

ABSI, in progressing an application of prospective staff (including contractors and volunteers), also collects and uses personal and sensitive information of the candidate. With the applicant's consent, this may include a criminal record check about the individual, which is used to assess the applicant's suitability for employment or engagement with ABSI.



ABSI may use your personal information to send you marketing or promotions/event information and ABSI or school publications (such as newsletters and magazines). You can contact us at any time (see details below) if you no longer wish to receive marketing or promotion/event information from us.

## 4. Who might ABSI disclose personal information to?

There are a range of people and organisations ABSI may disclose personal information to. The particular party ABSI discloses personal information to will depend on the dealings the individual has with us. For example, ABSI may disclose personal information, including sensitive information in certain circumstances, held about an individual to:

- an ABSI school or another school;
- government departments;
- medical practitioners;
- people providing services to ABSI or an ABSI school, including specialist visiting teachers, counsellors, sports coaches, English language colleges;
- recipients of ABSI publications, such as newsletters and magazines;
- Parents:
- anyone you authorise ABSI or an ABSI school to disclose information to;
- ABSI's insurers;
- service providers who provide us with business, technology, marketing, operational, professional and other services; and
- anyone to whom we are required to disclose the information to by law.

### 4.1. Sending information overseas

ABSI may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with technology service providers which are situated outside Australia or to facilitate a school exchange or enrolment. We only disclose personal information to our overseas service providers when it is necessary for the services they provide to us.

When we disclose your personal information overseas, we are required to take measures to ensure that your information will be protected.

# 5. Management and security of personal information

We mostly hold personal information electronically in our IT systems, secure servers and databases, but we also hold personal information in paper records. ABSI has in place steps to protect the personal information ABSI holds from misuse, interference and loss, unauthorised access, modification or disclosure including locked storage of paper records and password access rights to computerised records. ABSI's staff are also required to respect the confidentiality of students', Parents' personal information and information about each ABSI school and staff as individuals of the an ABSI school.



#### 6. Data breach notification

In the event of any loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, ABSI will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act.

## 7. Access and correction of personal information

An individual has the right to request access to any personal information which ABSI holds about them and ask ABSI to correct any inaccuracies.

To make a request to access or update any personal information ABSI holds about you or your child, please contact the Managing Director in writing (see details below). ABSI will require you to verify your identity and specify what information you require. ABSI cannot give you information about anyone else.

Making a request is free. However, ABSI may charge a reasonable fee to cover the cost of locating, retrieving, reviewing and copying any material requested. The fee will not be excessive, and ABSI will advise the likely cost in advance.

We will allow access or make the changes requested unless we consider the Privacy Act or another relevant law requires us to withhold the information, or not make the changes. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal. If we refuse you access or to correct your personal information, you can make a complaint about this, by following the complaint procedures in this privacy policy (see details below).

# 8. Consent and Rights of Access to the Personal Information of Students

ABSI respects every Parent's right to make decisions concerning their child's education. Generally, ABSI will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents or to an education agent representing the Parent.

ABSI will treat consent given by Parents as consent given on behalf of the student, and notice to Parents will act as notice given to the student. Parents may seek access to personal information held by ABSI about them or their child by contacting the Managing Director of ABSI (see details below). However, there will be occasions when access is denied. Such occasions would include 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 ABSI's duty of care to the student.

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



### 9. Enquiries and Complaints

If you would like further information about the way ABSI manages the personal information it holds, or wish to complain that you believe that ABSI has breached the Australian Privacy Principles, please contact:

Managing Director
Australian Boarding Schools International
0437305640
PO Box 290, Margate, Tas. 7054
annie@australianboardingschools.com.au

ABSI will investigate any complaint, and respond to you as soon as we can. We will try to do this within 10 working days of receiving your complaint. If this is not possible, we will contact you and let you know when we will respond to your complaint. We will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

ABSI takes any privacy complaint seriously and will deal with all complaints fairly and promptly. However, if you are not satisfied with our response to your complaint you can refer your complaint to the Ombudsman Tasmania (in writing):

https://www.ombudsman.tas.gov.au/complaints

Phone: 1800 001 170

# 10. Using other websites

ABSI's website may contain links or references to other websites to which this privacy policy may not apply. You should review the privacy policy of each of those websites and assess whether those policies are acceptable to you before using those websites.

#### 11. ABSI Schools

Each school appointing ABSI will have its own privacy and collection policy. You should review the privacy policy of each of those schools and assess whether those policies are acceptable to you regarding the privacy and collection of personal information.



# 12. Policy Management

ABSI may, from time to time, review and update this document to take account of new laws and technology, changes to ABSI's operations and practices and to make sure it remains appropriate to a changing environment.

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### Distribution

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V2.1	ABSI Procedures Manual	17 Dec 2022
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### Annexure A - Standard Information Collection Notice

### 1. Standard Information Collection Notice

- Australian Boarding Schools International (ABSI) collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at an ABSI School.
- 2. ABSI collects this information via a variety of means, including the documents and forms submitted by you, by written notes or notes of conversations with academic, pastoral or administrative staff of an ABSI school. In some circumstances, ABSI may collect personal information about you from a third party, for example a report provided by a medical professional, a reference from another school or a report from an English language course provider.
- 3. We may be required to collect personal information in accordance with legislation in accordance with each state/territory Education Act, Public Health Act, and Child Protection Act.
- 4. The primary purpose of collecting this information is to enable ABSI to provide information to an ABSI school for the purpose of considering a student for enrolment and/or to enable a student to take part in activities of an ABSI School or an ABSI event.
- 5. If we do not obtain the information referred to above we may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.
- 6. On occasions information such as academic and sporting achievements, student activities and similar news is published in an ABSI or an ABSI School newsletter and magazine or website. Photographs of student activities such as sporting events, school camps and school excursions may be taken for publication in an ABSI or school newsletter and magazine or website.
- 7. ABSI from time to time discloses personal and sensitive information to the types of entities listed in our privacy policy, for administrative and educational purposes including to facilitate the transfer of a student to another school. This includes disclosure to other schools, government departments, medical practitioners, and people providing services to an ABSI School or to ABSI, including specialist visiting teachers, coaches, volunteers and counsellors or English language providers. ABSI may also share information with appointed education agents/counsellors of the family.
- 8. ABSI may disclose your personal information to its technology service providers who may be based overseas, and/or store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
- 9. The ABSI Privacy Policy (available at: https://www.australianboardingschools.com.au/ also sets out:
  - a) how you may seek access to or correction of personal information collected about you; and
  - b) how you may complain about ABSI's management of your personal information.
- 10. We can be contacted at:

PO Box 290

Margate, TAS. 7054

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