



YOS Independent School
 YOS Lawnton and Goodna Campuses
 (A Queensland Non-State Independent School)

PRIVACY POLICY		CODE: PRIV2018
Scope of Application:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the school site; 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.	
Filing Instructions:	F Drive - F:\Programs\Independent Schools\Master School Folder\Current Policies and Procedures\Finalised Policies and Procedures	
Related policies / legislation:	<ul style="list-style-type: none"> • Privacy Act 1988 • Australian Privacy Principles • Privacy Amendment (Enhancing Privacy Protection) Act 2012 • YOS Independent School Child Protection Policy • Education (General Provisions) Act 2006 • TSA Privacy Act Compliance Policy • TSA Privacy Policy APP Australia 	
Forms	<ul style="list-style-type: none"> • YOS Privacy Notice and Consent Form • TSA Privacy Notice and Consent Form 	

Change record / revision history:

Version	Prepared/ reviewed by	Date reviewed	Approved by	Authorised by	Review date
18.1	Helen Boardman	December 2018	Darren McGhee	Thomas Austin	December 2020
18.2	Helen Boardman	Amendments: 23/04/2020			December 2020

This policy will document the Salvation Army's updated Privacy Policy and the Privacy Policy and Guidelines specifically for YOS Independent Schools (adapted from [Independent Schools QLD](#))



Privacy Policy APP Australia

Preamble

This document is a copy of information published to The Salvation Army Website at <http://www.salvationarmy.org.au/privacy>

Personal Information:

You should read this policy before providing us with any personal information or before using our website. By providing us with your personal information or by using the website, you are confirming your agreement to the policies and procedures described in this policy. From time to time it may be necessary for us to review and revise this policy. We reserve the right to change this policy at any time.

The Salvation Army as an Organisation:

Protecting your privacy is fundamental to the way we care for people. For the purpose of this Privacy Policy, 'The Salvation Army' (and 'we', 'our', 'us') means:

- The Salvation Army (being the unincorporated worldwide religious and charitable association)
- The Salvation Army (New South Wales) Property Trust Act 1929 (NSW)
- Salvation Army (Queensland) Property Trust Act 1930 (Qld)
- Salvation Army (Tasmania) Property Trust Act 1930 (Tas)
- The Salvation Army (Victoria) Property Trust Act 1930 (Vic)
- The Salvation Army (South Australia) Property Trust Act 1931 (SA)
- The Salvation Army (Western Australia) Property Trust Act 1931 (WA)
- Salvation Army Property Trust Act 1934 (ACT)
- Salvation Army (Northern Territory) Property Trust Act 2002 (NT)
- any organisations or bodies corporate owned or operated by any of the bodies above

Policy

Your Privacy is Important to Us

The Salvation Army is committed to upholding the Australian Privacy Principles contained in the Privacy Act 1988. We recognise the importance of privacy and community awareness regarding the collection, use, disclosure and security of personal and sensitive information which we may collect during the course of our many functions. This Privacy Policy sets out how we manage your personal and sensitive information and protect your privacy

The Information We Collect and Hold

The Salvation Army performs many functions and provides a wide range of services and programs across Australia. We will only collect personal and sensitive information that is necessary for us to carry out these functions and provide these services and programs. The type of information we may collect, hold and use, varies depending on the purpose for which it is collected but may include the following (amongst others):

Supporters: as a supporter of The Salvation Army's mission and activities, we may need to collect your name and contact details. As a valued financial supporter of our fundraising activities, we may also need to collect your bank account or credit card details

Service recipients: program participants or clients of our other services - as a recipient of, or participant in, one of our many services and programs (such as aged care, recovery, welfare, employment assistance, social or other services and programs), we may need to collect your name and contact details, information regarding your health, income status, religious beliefs, ethnicity and emergency contact details

Customers: as a customer at one of our many stores, we may need to collect your name and contact details at the time of purchase or in connection with your donation of goods

Personnel: as an officer, employee, volunteer or member of The Salvation Army, we may need to collect information about your name and contact details, bank account and taxation details, qualifications, previous experience and emergency contact details

How we collect and keep safe your personal and sensitive information

How we collect and store personal and sensitive information varies depending on the purpose for which it is collected. We may collect your personal information:

- directly from you, either in person, over the phone or by email
- from third parties where you have specifically authorised us to do so
- through our website including through forms on our website.

We will always collect your personal information directly from you unless it is impracticable to do so. This would usually be done in person, over the telephone or by email.

Examples may include:

- copies of your written correspondence with us
- copies of receipts and/or transaction records in relation to your financial support of our fundraising activities
- copies of your application form, request for assistance and/or other associated documents (including documents generated during your participation in a program with, or otherwise during your interactions with us) and information that you may provide to us in relation to one of the many services and programs we offer
- copies of your volunteer agreement or employment agreement and any associated documents and information you provide to us in connection with your volunteering for or employment with The Salvation Army

We may keep copies of the above documents (in physical and/or electronic form, at our election) as is necessary to carry out our functions and provide our services and programs. All personal and sensitive information is securely stored at all times by us or an authorised external service provider and only authorised people will have access to the above documents and information.

Why we collect, hold and use personal and sensitive information

We may collect, hold, use and disclose personal and sensitive information for purposes necessary to carry out our functions and provide our services and programs. Generally, these purposes include:

- to keep in contact with you as a supporter of The Salvation Army and to inform you about the role and extent of our work and mission
- to manage our fundraising activities and for taxation record-keeping purposes associated with your donation to The Salvation Army
- to assess your welfare needs and to provide you with the welfare and community services and assistance we offer
- to provide you with the necessary care and assistance during your time as a resident of, or recipient of services from, one of our services, centres or facilities (such as aged care centres, recovery services, crisis accommodation services, etc.)
- to provide you with the services requested by you from us
- to facilitate and manage your purchase from, or donation of goods to, one of our stores
- to comply with necessary business and accounting standards
- to comply with our reporting obligations to the Australian Taxation Office and other government agencies and public sector bodies
- to facilitate and manage your employment relationship or volunteer arrangement with The Salvation Army

We are committed to maintaining your privacy and we will only use your personal and sensitive information for a permitted purpose for which we have collected the information. There is no obligation for you to provide us with any of your personal information however if you choose not to provide us with your personal information, we may not be able to provide you with the services that you require. You have the option of not identifying yourself or using a pseudonym when dealing with us in relation to a particular matter, unless we believe it is impracticable to do so in the circumstances. If you wish to deal with us in this manner, you must tell us in writing so that we can consider if your request is practicable.

How we may share your information

If necessary, to carry out our functions and provide our services and programs, we may need to disclose your personal and sensitive information to external service providers (such as information technology service providers, legal service providers, mailing houses, call centres, other community service providers, etc.) and other organisations.

We will only share your personal and sensitive information in accordance with your express consent and instructions, subject to the exclusions set out in the Australian Privacy Principles, or in accordance with the specific Privacy Notice provided to you by us at or near the time of collection of your personal and sensitive information.

We do not supply our database information to other marketing organisations not acting on our behalf.

How we use Google Remarketing

We do not collect any individual personal information on visitors to our website without your knowledge. We do collect non-personal information that allows us to log information about visitors to our website for statistical purposes, such as:

- the number of unique sessions as identified by server address and top-level domain name (e.g. .com, .gov, .org, etc.)
- the number of page hits
- the pages accessed or downloaded by session
- the type of browser being used

- the length of time spent on the site and on particular pages
- the device being used (e.g. desktop or mobile)
- the type of mobile device being used (e.g. iPhone 6).

In addition:

- we have implemented and use Display Advertising
- we use Remarketing with Google to advertise online
- third-party vendors, including Google, show our ads on sites across the Internet
- we and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimise, and serve ads based on someone's past behaviour to our website
- users can opt out by utilising Google's Opt-out Browser Add-on (<https://tools.google.com/dlpage/gaoptout/>) and/or Ads Preferences Manager (<https://www.google.com/settings/ads/>)

What international disclosure do we make?

The Salvation Army is an international movement with a presence in over 120 countries. While every effort is made to keep personal and sensitive information we hold in Australia only, in order to carry out our functions and provide our programs and services we may need to disclose personal and sensitive information to overseas recipients, unless expressly prohibited by law. In the unlikely event such disclosure is required, it will generally involve disclosure to international territories of The Salvation Army and only to the extent necessary to carry out our functions and provide our programs and services.

How you can access and seek correction of your personal and sensitive information

You have the right to access your personal and sensitive information, subject to some exceptions allowed by law. If you would like to access or seek correction of your personal and sensitive information, please contact our Privacy Office at the contact details below. For security reasons you will be asked to put your request in writing.

To enable us to verify your request we require you to advise the following:

- Your full name
- Address
- Contact phone number
- The relevant department or service (if known) that your request relates to

There is no application fee for making a request to access your personal and sensitive information. While we do not normally charge for providing individuals with access to their personal and sensitive information, we reserve the right to charge you for our reasonable costs in complying with a request for access. These costs will not be excessive.

How you can complain about a breach of the Australian Privacy Principles?

We are committed to protecting your privacy and upholding the Australian Privacy Principles. If you believe we have breached the Australian Privacy Principles, please contact our Privacy Office with your concerns at the contact details below. We take all complaints very seriously and we will endeavour to respond to your complaint and address your concerns as soon as reasonably practicable.

How we comply with the Notifiable Data Breaches Scheme

We will notify you in the event your personal information is involved in a data breach that is likely to result in serious harm. This notification will include recommendations about the

steps you should take in response to the breach. We will also notify The Australian Information Commissioner of eligible data breaches. Each suspected data breach reported to us will be assessed to determine whether it is likely to result in serious harm, and as a result require notification.

How you can contact our Privacy Office

We welcome and appreciate your feedback or comments in relation to our Privacy Policy and the collection of personal and sensitive information. If you have any questions in relation to privacy please contact our Privacy Office for your state or territory at the contact details below:



Privacy Office, The Salvation Army, PO Box 479, BLACKBURN, VIC, 3130

Email: privacy@aus.salvationarmy.org

Telephone: 1800 961 088 between 9:00am and 4:30pm Monday to Friday

School Specific Privacy Policy

This School Specific Privacy Policy sets out how YOS Independent School manages personal information provided to or collected by it. YOS Independent School is bound by the Australian Privacy Principles contained in the *Privacy Act*. YOS Independent School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changed to YOS Independent School's operations and practices and to make sure it remains appropriate to the changing school environment.



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

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

- Students and parents and/or carers before, during and after the course of a student's enrolment at the School:
 - Name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
 - Parents education and occupation
 - Medical information (eg details of disability, allergies, asthma, diabetes, epilepsy, medical reports)
 - School reports, conduct records, behaviour reports, information about referrals to government welfare agencies
 - Counselling reports
 - Health fund details and Medicare number
 - Any court orders or legal issues
 - Volunteering and/or work information
 - Photos and videos at school events
- Job applicants, staff members, 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 (eg details of disability, allergies, 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 provided by other people:

In some circumstances YOS Independent School may be provided with personal information about an individual from a third party, for example, a report provided by a medical professional or a reference from another school.

How will the School use the personal information you provide?

YOS Independent School will use personal information it collects from you for the primary purpose of collection, and 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

Students and Parents

In relation to personal information of students and parents, YOS Independent School's primary purpose of collection is to enable YOS Independent School to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the school. This includes satisfying the needs of parents/carers, the needs of the student and the needs of YOS Independent School throughout the whole period the student is enrolled at the school.

The purpose for which YOS Independent School uses personal information of students and parents/carers include:

- To keep parents/carers informed about matters related to their child's schooling, through correspondence and newsletters
- Day-to-day administration of YOS Independent School
- Looking after student's educational, social and emotional and medical well-being
- To satisfy YOS Independent School's legal obligations and allow the school to discharge its duty of care

In some cases, where YOS Independent School requests personal information about a student or parent, if the information requested is not provided, YOS Independent 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.

On occasions, information such as academic, sporting, improvement achievements, student activities and similar news is published in our School newsletter and on our website. This may include photographs and videos of student activities such as school camps and excursions. The School will obtain permission [annually] from the student's parent/guardian (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.

Volunteers

The School also obtains personal information about volunteers who assist YOS Independent School in its functions or conduct associated activities, such as graduation preparation or general reception duties, to enable YOS Independent School and the volunteers to work together.

Who might the School disclose Personal Information to and store your information with?

YOS Independent School may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes. This may include to:

- Another school or staff at another school
- 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, counsellors, other youth workers and providers of learning and assessment tools
- Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA), Independent Schools Queensland (ISQ), Non State Schools Accreditation Board (NSSAB), Queensland Curriculum and Assessment Authority (QCAA), Queensland Department of Employment, Small Business and Training (DESBT) and National Centre for Vocational Educational Research (NCVER)
- People providing administrative and financial services to YOS Independent School
- Recipients of School publications such as our newsletter
- Students' parents/carers
- Anyone you authorise YOS Independent School to disclose information to
- Anyone to whom we are required or authorised to disclose the information by law, including child protection laws

Consent and Rights of Access to Personal Information of Students

YOS Independent School respects every parent's right to make decisions concerning their child's education. Generally, YOS Independent School will refer any requests for consent and notices in relation to the personal information of a student to the students' parents. YOS Independent School 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.

As mentioned above, parents may seek access to personal information held by YOS Independent School about them or their child by contacting Darren McGhee, School Principal. 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 the YOS Independent School's duty of care to a student.

The School may, at its discretion, on the request of a student, grant that student access to information held by YOS Independent School about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parent/carer. This would normally be done when the maturity of the student and/or the student's personal circumstances warrant it.

Appendix 1

Standard Collection Notice

1. The School collects personal information, including sensitive information about students and parents/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/publicity and perform necessary associated administrative activities, which will enable students to take part in all activities of the School
2. 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
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, Public Health and Child Protection laws
4. 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
5. The School may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. These may include:
 - Other schools and teachers at those schools
 - Government departments (including for policy and funding purposes)
 - The Salvation Army, the local Corps and other related Salvation Army agencies within the YOS Independent School's community
 - Medical practitioners
 - People providing educational, emotional 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), Independent Schools Queensland (ISQ), Non State Schools Accreditation Board (NSSAB), Queensland Curriculum and Assessment Authority (QCAA), Queensland Department of Employment, Small Business and Training (DESBT) and National Centre for Vocational Educational Research (NCVER)
 - 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
6. Personal information collected from students is regularly disclosed to their parents/carers
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. The personal information may reside on a cloud service provider's server which may be situated outside Australia
8. The School's Privacy Policy, accessible on the School's website, sets out how parents/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

9. The School's Privacy Policy also sets out how parents/carers and students can make a complaint about a breach of the APPs and how the complaint will be handled
10. 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
11. On occasions information such as academic and sporting achievements, student activities and similar news is published in the School newsletters and on our website this may include photographs and videos of student activities such as school camps, excursions and graduation. The School will obtain permission (annually) from the students' parents/carer and/or from the student if appropriate, if we would like to include such photographs or videos in our promotional material or otherwise make this material available to the public such as on the Internet
12. If you provide the School with the personal details of others, such as doctor, other medical practitioners or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why

Appendix 2

Employment Collection Notice

1. In applying for this position, you will be providing YOS Independent School with personal information. We can be contacted at our Lawnton Campus 27-29 Lawnton Pocket Road, Lawnton QLD 4501, email yoslawnton@ae.salvationarmy.org, telephone 07 3285 8522 or at our Goodna Campus 27 Smiths Road, Goodna QLD 4300, email yoslawnton@ae.salvationarmy.org, telephone 07 3280 8800
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 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, (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. The personal information may reside on a cloud service provider's server 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

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the School, you will be providing YOS Independent School with personal information. We can be contacted at our Lawnton Campus 27-29 Lawnton Pocket Road, Lawnton QLD 4501, email yoslawnton@ae.salvationarmy.org, telephone 07 3285 8522 or at our Goodna Campus 27 Smiths Road, Goodna QLD 4300, email yoslawnton@ae.salvationarmy.org, telephone 07 3280 8800
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 up to 1 year after contractor/volunteer ceased relationship with YOS Independent School
4. The 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 conduct a criminal record check, 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 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 email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. The personal information may reside on a cloud service provider's server 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

[YOS Privacy Notice and Consent Form](#)

(click on the link to access the form)

[TSA Privacy Notice and Consent Form](#)

(click on the link to access the form)

These forms are to be used whenever we collect personal information. They are to be read in conjunction with this Privacy Policy