

Overview

The Canberra Grammar School Foundation (CGS Foundation) is required to collect sufficient information from its donors to enable the administration and processing of donations to the Foundation. The CGS Foundation also uses information collected and stored by its related body, the Canberra Grammar School (the School), where consent has been received from an individual to disclose this information to the CGS Foundation. Information is used in the following ways:

- To seek donations for CGS Foundation fundraising projects
- To undertake day-to-day administration and provide administrative records to donors
- To communicate with the School community regarding CGS Foundation events
- To facilitate community building for the CGS Foundation and the School
- To circulate other information relevant to the primary functions of the CGS Foundation.

The CGS Foundation understands its responsibility to manage and use this information judiciously and with confidentiality.

This Policy outlines the CGS Foundation's approach to using and managing personal information in its possession. The CGS Foundation is bound by the National Privacy Principles contained in the Privacy Act and implements policies and systems to ensure the safe keeping of personal information. This Policy provides direction to staff as to how to use personal information and the limitations in sharing this information.

Objective

This Policy provides direction for the appropriate and secure management of personal information provided to or collected by the CGS Foundation

Relevant Legislation

Privacy Act 1988

National Privacy Principles 2014

Working With Children And Young People – Volunteering – ACT Government Policy

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Policy

The CGS Foundation is bound by the National Privacy Principles contained in the Privacy Act 1988. This Policy outlines the CGS Foundation's approach to using and managing personal information in its possession. The CGS Foundation is required to use the personal information it collects only for the purpose(s) for which it was obtained and to share it in accordance with relevant laws.

The CGS Foundation may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the CGS Foundation's operations and practices and to make sure this policy remains appropriate. It also has procedures in place to ensure that the information is collected, managed and stored in a secure manner.

Responsibilities

This Policy is applicable to all staff, CGS Foundation donors, and the Canberra Grammar School community.

Whilst the Head of Canberra Grammar School has overarching responsibility for this policy document, the following are also responsible for monitoring this document in relation to their roles and responsibilities and for ensuring that it is updated as required.

- Canberra Grammar School Business Director
- CGS Foundation Manager
- Canberra Grammar School Operations Manager

Definitions

'Sensitive information' means information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record; and health information about an individual.

'Staff' refers to all teaching, support and other staff members, collectively or individually depending on context. For the sake of brevity and as in common spoken parlance, the word 'staff' is generally used throughout this and related documents in place of 'staff members'.

References

Privacy Act 1988

Procedure for Implementing the Privacy Policy within the CGS Foundation

Information Collected

The CGS Foundation collects information only as required to perform its functions and fulfil its legal obligations. Such information is always collected and managed in accordance with relevant privacy legislation.

The type of information that the CGS Foundation collects and holds may include (but is not limited to) personal information, including sensitive information, about:

- CGS Foundation donors
- Students, CGS Old Boys and parents and/or guardians of Canberra Grammar School before, during and after the course of a student's enrolment at the School
- Staff members
- Volunteers
- Other people who come into contact with the CGS Foundation.

Personal Information

- The CGS Foundation will generally collect personal information about an individual using the online donation form on the CGS Foundation website, print forms completed by donors or through face-to-face meetings and interviews, and telephone calls. The CGS Foundation may also obtain personal information about an individual from its related body, the Canberra Grammar School, when permission has been obtained to do so. This permission may be implied in relation to Old Boys and past parents of Canberra Grammar School.
- The CGS Foundation will provide all individuals with the option to remain anonymous or use a pseudonym in their dealings with the CGS Foundation.
- The CGS Foundation may be provided with personal information about an individual from a third party, but will only use or store this information if appropriate to do so and directly related to CGS Foundation functions.
- The CGS Foundation uses personal information it collects for the primary purpose for which it is obtained. It may also use it for secondary purposes that are related to the primary purpose and may be reasonably expected, or for which consent has been given.

Students, Parents and CGS Old Boys

Personal information is used by the CGS Foundation for the following purposes:

- day-to-day administration;
- receipting and recording donations to the CGS Foundation
- thanking donors for their contributions to the CGS Foundation
- keeping CGS Foundation donors informed about the appropriate use and management of their gifts
- keeping CGS Foundation donors and the CGS community informed about matters relating to the primary functions of the CGS Foundation
- undertake fundraising campaigns seeking donations, via mail or email, for CGS Foundation fundraising projects only
- correspondence in relation to the events and activities of the CGS Foundation and of its related body, the Canberra Grammar School

Volunteers

- The CGS Foundation obtains personal information about volunteers who assist the CGS Foundation and related bodies such as Canberra Grammar School, the P&F Association and the CGS Old Boys. Information is collected to the extent required to enable the CGS Foundation and the volunteers to work together and to ensure the safety of students.

Marketing, fundraising and community building

- The CGS Foundation has as its primary functions community building, marketing and sourcing donations for the future growth and development of the Foundation, with its mission to *support the long-term security, advancement and renewal of Canberra Grammar School as a world-class leader in modern education.*
- Personal information held by the CGS Foundation may be disclosed to organisations that assist in the CGS Foundation's fundraising and community building. These include the P&F Association, the Old Boys' Association, and Canberra Grammar School.
- Parents, staff, contractors and other members of the CGS Foundation community and wider Canberra Grammar School community may from time to time receive fundraising information. This information will relate solely to fundraising projects coordinated by and for the CGS Foundation, and its related body, Canberra Grammar School.

Disclosure of Personal Information

The CGS Foundation may disclose personal information, including sensitive information, held about an individual to:

- Canberra Grammar School
- Anyone authorised by the relevant individual to receive this information.
- From time to time, when necessary for the primary functions of the CGS Foundation, the CGS Foundation may disclose personal information to third parties or contractors in order to achieve these functions. For example, names and addresses may be provided to a third party mailing house in order to conduct large-scale mail campaigns. Where personal information is provided to a third party or contractor, the CGS Foundation will ensure the information is used for the express purpose of conducting CGS Foundation functions and is not stored, passed on, or used in any other way by the third party.
- Such information would only be shared where it is legal to do so and only if necessary for the CGS Foundation to fulfil its functions or its legal obligations. Where personal information is shared with a third party, only the information that needs to be disclosed is shared, not necessarily all information relating to that person.
- On occasion information and related photographs regarding CGS Foundation and Canberra Grammar School events and activities may be used in CGS Foundation communications and marketing materials and on the CGS Foundation website. The CGS Foundation, via the Canberra Grammar School, will seek annual permission from individuals and Canberra Grammar School student's parent/guardians for the use of information or photographs in such publications.
- The CGS Foundation will obtain separate permissions from the individuals and the parents/guardians of Canberra Grammar School students prior to publication if the CGS Foundation seeks to include photographs or other identifying material in external (beyond the CGS Foundation or CGS community) promotional or advertising material for the CGS Foundation or otherwise make it available to the public.

Sending information overseas

- All personal and sensitive information used by the CGS Foundation is stored electronically on servers within Australia.
- The CGS Foundation does not disclose personal information about an individual to overseas recipients.

Management of Personal and Sensitive Information

Personal and sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless agreed by the individual.

Management and security of personal information

The CGS Foundation and its staff respect the confidentiality of personal information and the privacy of individuals. The CGS Foundation has in place procedures to protect the personal information it holds from misuse, loss, unauthorised access, unauthorised modification or disclosure. A range of methods are used to secure this information including locked storage of paper records and security protected access rights to computerised records.

Updating personal information

The CGS Foundation endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information by contacting the CGS Foundation or via the CGS Foundation website at cgsfoundation.org.au. The National Privacy Principles, to which the Foundation complies, requires the Foundation not to store personal information longer than necessary.

Consent and Rights of Access

Access

Under the Privacy Act, an individual has the right to obtain access to any personal information that the CGS Foundation holds about them, and to advise the CGS Foundation of any perceived inaccuracy.

In accordance with the exceptions set out in legislation, access to personal information may be denied in certain circumstances. Such occasions would include situations where release of the information would have an unreasonable impact on the privacy of others.

To access personal information that the CGS Foundation holds, an individual should contact the CGS Foundation Manager in writing, including verification of identity and outline the specific information required. If the CGS Foundation is unable to provide access to the information sought, it will provide the applicant with written notice explaining the reasons for refusal.

Enquiries and complaints

Further information about the way the CGS Foundation manages the personal information it holds can be obtained from the office of the Business Director.

Should any person wish to complain on the grounds that they believe that the CGS Foundation has breached the Australian Privacy Principles, he or she should contact the Head of School. The CGS Foundation will investigate any complaint and notify the complainant of the decision in relation to the complaint as soon as is practicable after it has been made.