

Privacy Policy

Policy Statement

Independent Schools Queensland Ltd (ISQ) is an entity bound by the Australian Privacy Principles (APPs) in the Privacy Act. ISQ is committed to treating the personal information collected from its members and other sources in accordance with the APPs. A copy of the APPs can be obtained from the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

ISQ collects personal information for the primary purpose of developing and delivering products and services to its members. The security of personal information is very important to ISQ and there are systems in place to protect the personal information held. This privacy policy describes how ISQ handles personal information.

To access or update your personal information, to obtain further information about ISQ's privacy practices or to make a privacy complaint, contact our Privacy Officer by email at office@isq.qld.edu.au.

ISQ may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to ISQ operations and practices and to ensure the policy remains appropriate to the changing environment. Any changes made to the policy will be posted on the ISQ website.

Personal information ISQ collects and why it is collected

Information from Member Schools

ISQ's primary purpose for collecting personal information from member schools is to develop, deliver and inform its members of its products and services including:

- Professional development and training;
- Regulatory advice, guidance and support;
- Assessing and distributing funds to schools for funded and special programs;
- Assisting schools to develop subject area networks;
- Engaging in advocacy on behalf of the independent school sector.

Personal information that ISQ collects from member schools is usually provided when they:

- Apply for ISQ membership, such as the names, email addresses and phone numbers of board members, school principals and other school staff;
- Seek member services from ISQ such as regulatory guidance, training and support which may include providing student's personal information such as behavioural, educational, pastoral care, medical records, court documents and communications between schools and

parents about their children. Where practicable, ISQ encourages members to de-identify this information, provided this does not substantially affect the quality or accuracy of the services;

- Seek member services from ISQ including reviews of school boards, school executives and school operational reviews. Information includes opinions about school staff from surveys and interviews and board documents such as board minutes;
- Collaborate with ISQ to share school news stories with media and when assisting ISQ to manage media enquiries about schools;
- Seek employee relations services from ISQ, including providing school staff health information, qualifications, work history and work performance assessments;
- Assist ISQ to market its events, products and services to school staff or invite school staff to participate in panel discussions or otherwise participate in ISQ events and training;
- Provide completed media release consent forms to ISQ to use a person's image in ISQ communications and publications;

Member schools may also have other organisations affiliated with their school, for example, Early Education and Care Services, International Education Providers and Vocational Education and Training Providers. ISQ may also collect personal information from member schools about the staff of these other organisations and persons who attend them.

Any personal information that is unsolicited will be dealt with in accordance with the APPs, including destroying or de-identifying the information if required.

When ISQ collects personal information from members, where appropriate and where possible, it is explained to members why the information is being collected and how ISQ plans to use it.

Information from ISQ employees

The primary purposes for which ISQ collects personal information from its employees are to:

- Administer the individual's employment arrangements;
- Meet ISQ's insurance obligations;
- Meet ISQ's legal obligations, for example, under work health and safety legislation.

The personal information ISQ collects from its employees may include their names, contact details, bank, tax and superannuation information, leave balances, health, curriculum vitae, work qualifications and accreditations, professional development, performance, conduct and workplace investigations.

The handling of employee records of current and former employees is exempt from the Privacy Act in certain circumstances. The exemption applies if the act or practice is directly related to:

- A current or former employment relationship between ISQ and the individual; or

- An employee record held by ISQ relating to the individual. Employee records are specifically defined in the Privacy Act, some examples include health information, leave balances and performance or conduct records.

Information from other persons

ISQ also collects personal information from other persons, such as the names and contact details of committee members and other external stakeholders when engaging in advocacy work on behalf of the independent school sector and external consultants to facilitate the provision of services to its members, and from individuals who register for ISQ services, training and events.

How ISQ collects personal information

Generally, ISQ collects personal information directly from members, for example, when dealing with members in person at events, meetings, over the phone, via written correspondence, questionnaires, surveys or when they subscribe to ISQ publications.

ISQ collects personal information from prospective employees before engagement and during the time that an employee works for ISQ.

Holding personal information

ISQ holds personal information in both hard copy and electronic formats.

ISQ employees are trained in their obligations under the Privacy Act. ISQ takes reasonable security measures, including technical and organisational measures, to protect the personal information held, which include:

- Physical controls, for example, security passes to enter the office and storage of physical records in lockable cabinets; and
- Technological controls, for example, restriction of access, firewalls, the use of encryption, passwords and digital certificates.

ISQ has policies and processes that govern records management and retention, ensuring that personal information is current and that personal information that is no longer required is deleted or deidentified as soon as reasonably practicable. Certain personal information must be retained for varying periods to comply with legal and regulatory obligations and for other legitimate business reasons.

ISQ may engage third parties to host electronic data on its behalf. ISQ may store personal information in the 'cloud' which may mean that it resides on servers that are situated outside Australia. However, ISQ will not send personal information about an individual outside Australia without:

- Obtaining the consent of the individual to whom the information relates; or

- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Using and disclosing personal information

The Privacy Act allows ISQ to use or disclose personal information for the reason it was collected (the primary purpose). ISQ cannot use or disclose personal information for another reason (a secondary purpose) unless an exception applies.

Exceptions include:

- You've consented to us using or disclosing your personal information for a secondary purpose; or
- ISQ uses or discloses your personal information because it is thought to be reasonably necessary for enforcement-related activities carried out by, or on behalf of, an enforcement body; or
- A secondary purpose is required or authorised under an Australian law, or court or tribunal order.

Some of the ISQ governance and compliance functions that are performed to meet its primary purpose require ISQ to use the personal information held, including managing any quality or risk management issues and meeting regulatory obligations. ISQ may also use and disclose member's information to other industry and event partners to partner with them for the provision of products and services.

ISQ may also use personal information for development and analytics purposes to develop expertise and know-how, including for benchmarking, development, analytics and business intelligence functions including website trend and performance analysis, quality assurance and thought leadership.

Using and disclosing information provided by member schools

ISQ uses and discloses the personal information it collects from member schools and their staff, for the primary purpose of developing and delivering products and services to its members.

ISQ may use de-identified and aggregated information for several purposes including for data analytics, research, funding administration, submissions to government, thought leadership and promotional purposes.

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

In most instances where support or guidance is provided to member schools, the school is encouraged to provide de-identified information about students, staff and parents to ISQ to inform service provision. If sensitive information is given to ISQ, it will be used and disclosed only for the

purpose for which it was provided or a directly related secondary purpose, unless consent is provided or the use or disclosure of the sensitive information is allowed by law.

Using and disclosing information about ISQ employees

ISQ will only use and disclose its employee's personal information to meet the primary purpose for which it was collected which includes to:

- Administer the individual's employment arrangements;
- Meet ISQ's insurance obligations;
- Meet ISQ's legal obligations, for example, under child protection or work health and safety legislation.

This may require disclosure of employee's personal information to other persons including:

- The employee's authorised representatives and advisors;
- Personnel within ISQ and professional advisors;
- Experts or other third parties contracted as part of an engagement;
- Agents, third party contractors and suppliers that assist ISQ with providing business processes and products and services;
- Nominated superannuation funds;
- Other ISQ controlled entities (which includes entities wholly or dominantly owned and controlled);
- Third parties as part of an actual or proposed acquisition, disposition, merger or de-merger of a business or to enter into an alliance or joint venture;
- Other entities including government or regulatory bodies, for example, the Australian Taxation Office and the Australian Securities Investment Commission and professional or industry bodies or agencies as part of an engagement or as required by legislation;
- Other persons when the employee asks ISQ to do so or when the employee consents to that disclosure.

ISQ does not disclose personal information to other persons for the purpose of allowing them to send marketing material to employees. However, ISQ may share non-personal, de-identified or aggregated information with select third parties for research, development, analytics or promotional purposes other than direct marketing.

Automated Decisions

ISQ may use personal information in the operation of computer programs to make, or assist in making, certain decisions (*automated decisions*). The personal information used for this purpose may include those set out above. The decisions made or assisted using this personal information may include decisions about ISQ's strategies, programs and services, and other decisions as notified by us from time to time.

Artificial Intelligence (AI) Systems

ISQ may use personal information in connection with an AI tool. The kinds of personal information that may be generated by AI systems include those set out above, under the heading 'Information ISQ Collects and Why it is Collected'.

Access to and updating personal information

Under the Privacy Act, individuals have the right to access their personal information which ISQ holds and to advise ISQ of any perceived inaccuracy. There are some exceptions to this right in the Privacy Act. For example, ISQ may deny access where the release of information would have an unreasonable impact on the privacy of others.

To make a request to access information, contact the Privacy Officer in writing. ISQ may require you to verify your identity and specify what information you require.

ISQ may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, ISQ will advise the likely cost in advance.

If your request for access is refused, ISQ will provide you with written notice explaining the reason for refusal and include in the response details on how to make a complaint should you wish to do so.

ISQ endeavours to ensure that the personal information it holds is accurate, complete and current. You may seek to update your personal information held by ISQ by contacting the Privacy Officer.

Enquiries and complaints

If you would like further information about this policy or the management of your personal information, or to lodge a privacy complaint, contact:

ISQ Privacy Officer

office@isq.qld.edu.au

ISQ will investigate your complaint in a timely manner and respond in writing. While ISQ hopes that it will be able to resolve any complaints you have, if you are not satisfied with the outcome, you may refer your complaint to the Office of the Australian Information Commissioner (enquiries@oaic.gov.au).