Privacy Policy

Pilgrim School

Title	Privacy Policy
Version	3.0
Current Date of Last Review	2026
Proposed Review Date	2029
Related Legislation and Regulatory Requirements	• Privacy Act 1988 (Cth) • Australian Privacy Principles • Notifiable Data Breaches Scheme • Surveillance Devices Act 2016 (SA)
Cross Sector Guidelines (SA)	• AISSA Privacy Compliance Manual (April 2025) • Australian Privacy Principles (OAIC Guidelines) • Independent Schools Australia (ISA) guidance • Australian Cyber Security Centre (ACSC) guidance (where applicable)
Related School Policies and Procedures	• Data Breach Response Plan • AI Acceptable Use Policy • Child Protection Policy • Records Management and Retention Procedures • Privacy Collection Notices (Enrolment, Employment, Volunteers, Website Enquiry, Concessional Tuition)
Responsibility	• Business Manager • Principal
Status	Active – Published on School Website
Approved by	Leadership Team and School Board

Date	Version	Revision Description
2002	1.0	Mandy Williams
2020	2.0	Michael Denholm
2023	2.1	Michael Denholm
2026	3.0	Michael Denholm

Privacy Policy

1. Introduction

Pilgrim School ("the School") is committed to protecting personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This policy explains how the School collects, uses, discloses, stores and manages personal information.

2. Kinds of Personal Information Collected

The School collects personal information (including sensitive information) about:

- Students and parents/caregivers before, during and after enrolment;
- Job applicants, employees, volunteers and contractors;
- Visitors and others who interact with the School.

Sensitive information may include health information, religious affiliation and other information defined under the Privacy Act.

3. How Personal Information is Collected

Information is generally collected through:

- Enrolment and employment applications;
- Online forms and digital platforms;
- Interviews, meetings and correspondence;
- Reports from medical practitioners and educational specialists;
- Government bodies and service providers where authorised or required.

Where required, the School provides a privacy collection notice at or before the time personal information is collected.

4. Purpose of Collection

The primary purpose of collection is to enable the School to provide education and fulfil its duty of care obligations.

Information may also be used for:

- Administration and communication;
- Student welfare and safety;
- Compliance with legal and regulatory requirements;
- Government reporting;
- Limited fundraising and community engagement activities.

5. Use and Disclosure

Personal information may be disclosed to:

- Government authorities;
- Educational and technology service providers;

- Medical practitioners and allied professionals;
- Law enforcement agencies;
- Other schools where required;
- Contractors and professional advisers engaged by the School.

The School does not sell personal information or disclose it to third parties for their own marketing purposes.

6. Limited Fundraising Communications

From time to time the School may communicate with families regarding voluntary contributions to the School's Scholarship Fund or Building Fund.

The School may also share information with families about community initiatives or supplier offers where the School receives a small commission on purchases made. In these cases, no personal information about families is passed to the third party. Families who do not wish to receive such communications may opt out at any time by contacting the School Office.

7. Artificial Intelligence

The School may use approved digital platforms that incorporate artificial intelligence functionality to support educational and administrative activities.

The School does not permit identifiable personal information to be entered into publicly available AI systems without approval.

Where AI tools are used:

- Personal information will only be used for permitted purposes;
- Human oversight applies to decisions affecting individuals;
- The School will take reasonable steps to ensure providers comply with privacy obligations, including where data may be stored overseas.

The School does not currently use automated decision-making processes in which personal information is used by a computer program to make, or substantially contribute to, decisions that could significantly affect the rights or interests of individuals. Should the School adopt such processes in future, this Policy will be updated accordingly.

8. Overseas Disclosure

Some service providers engaged by the School may store or process personal information outside Australia (for example, cloud-based software providers).

Where personal information is disclosed overseas, the School takes reasonable steps to ensure that the recipient handles the information in a manner consistent with the APPs, including through contractual safeguards. Where practicable, the School will identify the countries in which service providers are located upon request.

9. Data Security and Storage

The School takes reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Security measures include restricted access controls, password protection, secure storage systems and staff training.

10. Photographs, Video and Promotional Use

The School may take photographs and video footage of students, staff and visitors during School activities and events. This material may be used for purposes including newsletters, the School website, School publications, social media and promotional materials.

At the commencement of each school year, parents/caregivers are invited to review and update their preferences regarding the use of photographs and video footage of their child across each of these categories. The School maintains a record of these preferences and uses reasonable endeavours to act in accordance with them.

Where a family's preferences do not permit a particular use, the School will not knowingly use identifiable images of that child for that purpose.

For staff, contractors and visitors, the School will seek consent for identifiable promotional use of photographs or video footage.

11. CCTV and Surveillance

The School operates CCTV systems for safety, asset protection and incident investigation.

Collection

CCTV footage may capture images of students, parents, staff, contractors and visitors while on School grounds. Signage is displayed at entrances and in areas where CCTV operates.

CCTV generally operates outside of normal school hours (approximately 4:00pm to 7:30am) for security purposes. One camera positioned at the School's primary access gate ("Gate 2A") operates during school hours to monitor entry and exit points for student safety.

Two additional cameras are mounted on external building walls and directed towards the external doorways of student bathroom facilities. The cameras operate continuously during school hours. They capture only external pathway and doorway areas and have no line of sight into any interior space. Footage from these cameras is not routinely monitored – it is accessed only when the School has identified a specific incident requiring investigation, and only to establish which students were in the vicinity during the relevant time period.

The School does not record audio through its CCTV system.

Storage

Footage is stored locally on secure devices located on School premises. Remote access is restricted to authorised personnel.

Retention

Footage is retained on a rolling basis and automatically overwritten when storage capacity is reached.

In addition, all CCTV Homebase devices are manually cleared once per school Term generally on the first day of the new Term. This establishes a maximum retention period of approximately one school Term (up to approx. 13 weeks maximum), unless specific footage is required for an active investigation or legal purpose.

Prior to deletion, authorised staff confirm that no active investigation requires retention of particular footage.

Use and Disclosure

Footage may only be accessed or disclosed for legitimate safety, security or investigative purposes.

12. Access and Correction

Individuals may request access to personal information held about them and request correction where it is inaccurate, out-of-date, incomplete or misleading.

Requests should be made in writing to the Principal. The School will respond to access and correction requests within 30 days of receipt.

There may be circumstances where access is lawfully declined, including where providing access would have an unreasonable impact on the privacy of others, or where an exception under the Privacy Act applies. In such cases, the School will provide written reasons and advise the individual of available complaint mechanisms.

Where the School is unable to correct personal information as requested, the individual may ask that a statement noting the disputed accuracy be associated with the relevant record.

13. Anonymity and Pseudonymity

Where lawful and practicable, individuals may interact with the School without identifying themselves or by using a pseudonym.

In most cases, it will not be practicable for the School to deal with individuals anonymously due to its educational and duty of care obligations.

14. Employee Records Exemption

Under the Privacy Act, certain acts and practices directly related to a current or former employment relationship and employee records held by the School are exempt from the APPs.

15. Data Breach Response

The School maintains a Data Breach Response Plan and will comply with the Notifiable Data Breach Scheme where required.

16. Complaints

Complaints about the handling of personal information should be made in writing to the Principal.

The School will investigate and respond within a reasonable period. If an individual is not satisfied with the response, they may contact the Office of the Australian Information Commissioner (www.oaic.gov.au).

17. Review

This Privacy Policy is reviewed periodically and updated as required.