



Privacy Policy

The Australian School of Performing Arts (ASPA) is dedicated to ensuring the privacy and security of all personal information collected from our families, staff members, contractors, clients and other parties that make contact with us. ASPA adheres to the Commonwealth Privacy Act 1988, its thirteen Australian Privacy Principles (APPs) and the Privacy Amendment (Notifiable Data Breaches) Act 2017 in so far as they apply to our organisation and business operations. Any information we collect is kept strictly secured. We do not pass on, swap or sell any of your personal details.

Definitions

Personal information is information or opinion about a person whose identity is apparent, or can reasonably be ascertained, from the information or opinion – that is recorded in any form. For example, a person's name, address, financial information, phone number and date of birth (age).

Health information is information or opinion about a person's physical, mental or psychological health or disability, that is also personal information – whether in writing or not. This includes information or opinion about a person's health status, medical history, and allergies.

Sensitive information is information or opinion about a set of specific characteristics, including a person's legal guardianship parameters, racial or ethnic origin, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices; or criminal record. It also includes health information.

An **eligible data breach** occurs if there has been unauthorised access to, or unauthorised disclosure or loss of, Personal Information that a reasonable person would conclude is likely to cause serious harm to individuals to whom the information relates.

What information do we collect?

ASPA collects the following type of information:

- personal, financial, health, photos, and sensitive information about students and their family, as well as passport details as required, provided by students, their family and others.
- personal, financial, Working with Children Check details, health, photos, and sensitive information, as well as passport, driver's licence and public liability details as required, about job applicants, staff members, contractors and clients; provided by job applicants, staff members, contractors, clients and others.

How do we collect this information?

ASPA collects information in a number of ways, including:

- in person and over the phone: from students and their family, staff members, contractors, clients and job applicants
- from electronic and paper documentation: including job applications, employee personnel paperwork, emails, invoices, enrolment and re-enrolment forms, letters to ASPA, consent forms (for example: Permission to Arrive and Leave Independently forms), ASPA's website or ASPA-controlled social media
- through online tools: such as apps and other software used by ASPA

Why do we collect this information?

Primary purposes of collecting information about students and their families

ASPA collects information about students and their families when necessary to:

- support student's education needs and wellbeing
- fulfil legal requirements, including to:
 - allow ASPA to discharge its duty of care
 - make reasonable adjustments for students with special needs (anti discrimination law)
 - provide a safe and secure workplace (occupational health and safety law)
- enable ASPA to:
 - process a student's enrolment
 - provide the highest quality customer service available
 - keep students, parents and participants informed of ASPA activities through e-newsletters and other publications including photos
 - complete day to day administration
 - maintain the good order and operation of our organisation

Primary purposes of collecting information about others

ASPA collects information about staff members, contractors and job applicants to:

- assess applicants' suitability for employment
- administer employment placement
- support health and wellbeing
- keep them informed of ASPA activities through e-newsletters and other publications including photos
- fulfil various insurance obligations, including public liability and WorkCover
- fulfil various legal obligations, including employment and contractual obligations, work health and safety law and to investigate incidents
- respond to legal claims against ASPA

When do we use or disclose information?

ASPA uses or discloses information consistent with privacy law (Cth), as follows:

1. For a primary purpose – as defined above
2. For a related secondary purpose – for example, to establish car pooling relationships with other individuals who have consented; to enable ASPA's charity partner, Girls from Oz, to disseminate information
3. With notice and/or consent – including consent provided on enrolment and other forms
Unless ASPA is notified otherwise in writing, the successful enrolment of a student, or employment of a staff member or contractor, is taken as consent for ASPA to use photographs, audio and video recordings of classes and performances, for educational purposes and in promotional material. Individuals are informed of this possibility.
4. When necessary to lessen or prevent a serious threat to:
 - a person's life, health, safety or welfare
 - public health, safety or welfare
5. When required or authorised by law – including as a result of our duty of care, anti-discrimination law, occupational health and safety law, fee collection purposes, complying with tribunal or court orders, subpoenas or police warrants
6. To investigate or report unlawful activity, or when reasonably necessary for a specified law enforcement purpose, including the prevention or investigation of a criminal offence or seriously improper conduct, by or on behalf of a law enforcement agency
7. To establish or respond to a legal claim.

ASPA staff contact information, such as email addresses or phone numbers, may be disclosed to fellow ASPA staff members if ASPA has the individual's consent, for example, to establish venue team relationships or contact for ASPA-specific work commitments. Individuals are informed of this possibility.

Storing and securing information

ASPA takes reasonable steps to protect information from misuse and loss, and from unauthorised access, modification and disclosure. These steps include, but are not limited to:

- undertaking training and providing direction to staff and contractors who handle private information
- entering information into a customised, secure database system, which is accessed on a 'needs-only' basis and is handled in a sensitive and secure way
- destroying or de-identifying personal, health or sensitive information where ASPA no longer needs the information for any business purpose
- archiving Financial information in a secure location in accordance with the requirements of the Australian Taxation Office
- implementing a Data Breach Response Plan in the event that ASPA experiences or suspects there may have been an eligible data breach. This response plan is intended to enable ASPA to contain, assess and respond in a timely fashion and to help mitigate potential harm to affected individuals, per the requirements of the Office of the Australian Information Commissioner.

Accessing your information

ASPA endeavours to take all reasonable steps to ensure that the personal information it holds is accurate, complete and up to date. All individuals, or their authorised representative(s), have a right to access, update and correct information that ASPA holds about them.

ASPA will only provide information and communications to parents who have a legal right to that information. In cases of separated families, ASPA will not disclose information about one party to the other. If one party only is a legal guardian, ASPA will not disclose information about the student to the other parent.

ASPA families may seek to update their personal information held by ASPA by contacting our office. ASPA staff and contractors should update their personal information held by ASPA by contacting our HR department when necessary.

You have a right under the Freedom of Information Act to request access to documents that we hold – this request must be responded to within 30 days. Privacy Act (APPs 12 and 13). We will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible.

A handwritten signature in black ink, appearing to read 'Nicole Muir', written over a horizontal line.

Nicole Muir
CEO

This policy will be regularly reviewed.

Date: March 2018