



Privacy Policy

When referenced in this document the International School of Performing Arts includes the Australian International Girls Choir, the Australian School of Performing Arts, the Australian Girls Choir, Raw Energy Dance Education and ASPA Education.

The International School of Performing Arts (ISPA) is dedicated to ensuring the privacy and security of all information collected from our families, staff members, contractors, clients and other parties that make contact with us. ISPA adheres to the Personal Data Protection Act 2012 (PDPA) and the Commonwealth Privacy Act 1988, in so far as they apply to our organisation and business operations.

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.

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.

A **data breach** occurs if there has been unauthorised access, collection, use, disclosure, copying, modification or disposal of personal data; or the loss of any storage medium or device on which personal data is stored in circumstances where the unauthorised access, collection, use, disclosure, copying, modification or disposal of the personal data is likely to occur.

A **notifiable data breach** occurs if the data breach results in, or is likely to result in, significant harm to an affected individual; or is, or is likely to be, of a significant scale.

What information do we collect?

ISPA collects the following types 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, Certificate of Clearance 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?

ISPA 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 and contractor personnel paperwork, emails, invoices, enrolment and re-enrolment forms, letters and consent forms
- through online tools: such as ISPA's website, social networking services, apps and other software used by ISPA

Why do we collect this information?

The primary purposes for which ISPA collects information about students and their families include:

- supporting a student's education needs and wellbeing
- processing a student's enrolment
- providing the highest quality customer service available
- informing families about ISPA activities through e-newsletters and other publications including photos
- fundraising and marketing for our charity partner Girls from Oz
- completing day to day administration and maintaining the good order and operation of our organisation
- fulfilling legal requirements including to allow ISPA to discharge its duty of care or make reasonable adjustments for students with additional needs

The primary purposes for which ISPA collects information about staff members, contractors and job applicants include:

- assessing applicants' suitability for employment
- administering employment placement
- supporting health and wellbeing
- keeping individuals informed of ISPA activities through e-newsletters and other publications including photos
- fulfilling various insurance obligations, including public liability and Work Injury Compensation

- fulfilling legal obligations including employment and contractual and work health and safety
- investigating incidents and responding to legal claims against ISPA

When do we use or disclose information?

ISPA uses or discloses information consistent with PDPA law, as follows:

1. For a primary purpose – as defined above
2. For a related secondary purpose – for example, to establish participant relationships with other individuals who have consented
3. With notice and/or consent – including consent provided on enrolment and other forms
Unless ISPA is notified otherwise in writing, the successful enrolment of a student, or employment of a staff member or contractor, is taken as consent for ISPA to use photographs, audio and video recordings of classes and performances, for educational purposes, staff training and in promotional material. All images will support a positive message and not include the child's name. 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
7. To establish or respond to a legal claim.

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

Storing and securing information

ISPA 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 members 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 ISPA no longer needs the information for any business purpose
- archiving Financial information in a secure location in accordance with the requirements of the Inland Revenue Authority of Singapore and the Australian Taxation Office
- implementing a Data Breach Response Plan in the event that ISPA experiences or suspects there may have been an eligible data breach. This response plan is intended to enable ISPA to contain, assess and respond in a timely fashion and to help mitigate potential harm to affected individuals, per the requirements of the Personal Data Protection Commission of Singapore and the Office of the Australian Information Commissioner.

Accessing your information

ISPA endeavours to take all reasonable steps to ensure that the 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 ISPA holds about them.

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

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



Nicole Muir
CEO

This policy will be regularly reviewed.
Date: April 2024