

Privacy Policy

PURPOSE

Canberra Christian School (CCS) recognises and affirms the view that all people possess innate dignity, worth and a right to privacy. From this stem the principles of respect, kindness and transparency.

CCS seeks to protect and maintain dignity through sensitive, ethical and culturally aware use of personal information. In doing so, the School will comply with the Australian Privacy Principles contained in the Commonwealth Privacy Act.

POLICY STATEMENT

This policy applies to all employees, students, volunteers and contractors involved in the collection, use, holding or disclosure of personal information on behalf of the School.

1. **Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not. Examples include an individual's name, address, contact number and email address.
2. **Sensitive Information** is a special category of personal information. Canberra Christian School may collect personal information which is "sensitive information".

Such information includes:

- criminal records;
- health information;
- genetic information about an individual that is not otherwise health information
- biometric information;
- political, philosophical, religious opinions or beliefs;
- membership of professional or trade associations
- information concerning sexual orientation and practices; and
- information about racial and ethnic origin.

3. **Health information** includes information or an opinion about:

- (a) the health or disability of an individual; and
- (b) a health service to be provided to the individual.

4. **Employee Record** is defined broadly to be a record of personal information relating to the employment of an employee. Examples of this type of information include the terms and conditions of employment, personal contact details, performance and conduct, disciplining, salary, termination and trade union membership.

The School will regularly review and update this Privacy Policy to take account of new laws and technology, changes to schools' operations and practices and to make sure it remains appropriate to the changing school environment.

ASSOCIATED DOCUMENTS

- Privacy Act 1988 (Cth)
- Health Records (Privacy and Access) Act 1997 (ACT)
- Privacy Policy Guidelines
- Standard / Contractor and Volunteer /Recruitment collection Notices
- Permission to Publish Form and Personal Information Templates for Student, Parent and Employee

SIGNATURE(s):  _____ Date: 30 / 06 / 2014 .
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Guidelines

Collection of Information

Canberra Christian School (CCS) collects and holds personal information, including health and other sensitive information, about:

- pupils and parents and/or guardians ('Parents') before, during and after the course of a pupil's enrolment at the School;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the School.

CCS will generally collect personal information held about an individual by way of forms, including on-line forms, surveys or applications, filled out by Parents or pupils, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and pupils provide personal information.

A collection notice will be provided by the School at enrolment and annually to inform pupils and Parents of the purposes for which information will be used. Collection notices applicable to other individuals on whom personal information is collected will be provided as appropriate. The standard forms of collection notices are shown in Appendix One.

In some circumstances CCS may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another School or school.

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Policy does not apply to the School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and employee.

Under the *Health Records (Privacy and Access) Act 1997*, the Health Privacy Principles do apply to an employee record. As a result, this Policy does apply to the School's treatment of an employee health record, where the treatment is directly related to a current or former employment relationship between the School and employee.

Use of Information

CCS will use personal information it collects for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or for secondary purposes to which consent has been obtained.

Pupils and Parents: In relation to personal information of pupils and Parents, the School's primary purpose of collection is to enable the School to provide education for the pupil. This includes satisfying the needs of Parents, the needs of the pupil and

the needs of the School throughout the whole period the pupil is enrolled at the School.

The purposes for which the School uses personal information of pupils and Parents include:

- to keep Parents informed about matters related to their child's education, through correspondence, including digital correspondence, newsletters and magazines;
- day-to-day administration of the School;
- looking after pupils' educational, social and medical wellbeing;
- seeking donations and marketing for the School; and
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.

In some cases where the School requests personal information about a pupil or Parent, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity.

Job applicants, staff members and contractors: In relation to personal information of job applicants, staff members and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the School uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the School; and
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

Volunteers: The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities to enable the School and the volunteers to work together.

Marketing and fundraising: The School treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to provide a quality learning environment in which both pupils and staff thrive. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising, for example, the School's alumni organisation or, on occasions, external fundraising organisations.

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, such as newsletters and magazines or on-line and digital materials, which include personal information, may be used for marketing purposes.

Disclosure of Information

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

- another School or school;
- government departments;
- medical practitioners;
- people providing services to the School, including specialist visiting teachers, counsellors and sports coaches;
- recipients of School publications or electronic communication, such as newsletters, magazines, social media feeds and websites;
- Parents;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

Sending information overseas: The School may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia or to facilitate a school exchange or overseas excursion. However, the School will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Sensitive information

The School will take additional steps to protect sensitive information. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless otherwise agreed, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The School's staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

The School has in place steps to protect the personal information the School holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

Access and correction of personal information

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy. Pupils will generally be

able to access and update their personal information through their Parents, but older pupils may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation. To make a request to access or update any personal information the School holds please contact the Principal in writing. The School may require verification of identity and specify what information is required.

The School may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the School will advise the likely cost in advance. If the School cannot provide access to that information, the School will provide written notice explaining the reasons for refusal.

Consent and rights of access to the personal information of pupils

The School respects every Parent's right to make decisions concerning their child's education.

Generally, the School will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. The School will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

As mentioned above, Parents may seek access to personal information held by the School about them or their child by contacting the Principal. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the School's duty of care to the pupil. The School may, at its discretion, on the request of a pupil grant that pupil access to information held by the School about them, or allow a pupil to give or withhold consent to the use of their personal information, independently of their Parents. This would normally be done only when the maturity of the pupil and/or the pupil's personal circumstances so warranted.

Enquiries and complaints

If you would like further information about the way the school or *the School's Company* manages the personal information it holds, or wish to complain that you believe that the school or *the School's Company* has breached the Australian Privacy Principles, please contact the school's Principal. The school or *the School's Company* will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.

Appendix One

Standard Collection Notices

Standard Collection Notice

The School collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a pupil's enrolment at the School. This may be in writing, in the course of conversations with you or sought directly from a previous school. The primary purpose of collecting this information is to enable the School to provide schooling to the pupil and to enable them to take part in all the activities of the School.

Please note the following:

- Some of the information collected is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
- Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health [and Child Protection] laws.
- Health information about pupils is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. Medical reports about pupils may be requested from time to time.
- From time to time the School discloses personal and sensitive information to others for administrative and educational purposes, including to facilitate the transfer of a pupil to another school. This includes to other schools, government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, [sports] coaches, volunteers and counsellors.
- Personal information collected from pupils is regularly disclosed to you as their parents or guardians.
- The School may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia. The School uses industry standard procedures to protect this information.
- The School's Privacy Policy sets out how parents or pupils may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the pupil, or where pupils have provided information in confidence.
- The School's Privacy Policy also sets out processes for complaining about a breach of privacy and how the School will deal with such a complaint.
- From time to time the School engages in fundraising activities. Information received from parents may be used to make an appeal to the community. [It may also be disclosed to organisations that assist in the School's fundraising

activities solely for that purpose.] Personal information is not disclosed to third parties for their own marketing purposes without consent.

- On occasions information such as academic and sporting achievements, pupil activities and similar news is published in School newsletters, magazines, on the School website, on the School app and on School social media sites. Photographs of pupil activities such as sporting events, school camps and school excursions may be taken for publication in School newsletters, magazines, website, app and social media sites. Parents' business contact details may be included (on request) in a School business directory.
- Where the School is provided with the personal information of others, such as doctors or emergency contacts, parents are encouraged to inform them that that information has been disclosed to the School, that they can access that information if they wish and that the School does not usually disclose this information to third parties.

Employment Collection Notice

In applying for this position you will be providing Canberra Christian School with personal information. This may be in writing, in the course of conversations with you or, may be sought directly from a previous employer.

- If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
- The School's Privacy Policy contains details of how you may complain about a breach of the Australian Privacy Principles or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
- The School will not disclose this information to a third party without your consent.
- The School is required to ensure that you have completed a Working With Vulnerable People check and hold registration with the ACT Teacher Quality Institute. The School may also collect personal information about you in accordance with these laws.
- The School may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
- If you provide the School with the personal information of others, you are encouraged to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.

Contractor / Volunteer Collection Notice

In applying to provide services to Canberra Christian School, you will be providing us with personal information. This may be in writing, in the course of conversations with you or, may be sought directly from a previous employer.

- If you provide the School with personal information, for example your name and address or information contained on your resume, the School will collect the information in order to assess your application. The School may also make notes and prepare a confidential report in respect of your application.
- You agree that the School may store this information beyond the term of the contract or volunteer service.
- The School's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the Australian Privacy Principles.
- The School will not disclose this information to a third party without your consent.
- The School is required to ensure that you have completed a Working With Vulnerable People check. The School may also collect personal information about you in accordance with these laws.
- The School may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
- If you provide the School with the personal information of others, you are encouraged to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.

Appendix Two – Guidelines for staff

In order to comply with the policy the following guidelines will be followed.

Guidelines	Responsibility of	To be Actioned
<i>The Privacy Policy</i> will be endorsed by the School Council	School Council	School Council June 30 2014
School staff will be informed of and required to read and follow the endorsed <i>Privacy Policy</i> , and its appendices including collection notices.	Principal All Staff	Annually
<i>The Privacy Policy</i> will be made available to the community via the website and in hard copy on request.	Principal	From Council endorsement
The School will ensure that families, employees, applicants, contractors and volunteers receive and have access to collection notices.	Principal Bursar	From Council endorsement
Any personal information held by the School will only be used and disclosed in accordance with collection notices or with consent.	All staff	From Council endorsement
Requests for and access to personal information may be made to the Principal who will respond within 30 days after the request is received.	Principal	As requested
Where requests for and access to personal information are refused the Principal will give written notice of the reasons for refusal and mechanisms to make a complaint about refusal.	Principal	Within 30 days after the request is received
Where personal information is requested consideration will be given to the	All staff	Prior to request

reasonable necessity of such. Particular care needs to be taken in relation to sensitive information and staff should seek advice from the Principal.		
The School will not solicit personal information from 3 rd parties except as authorised by collection notices.	All staff	Ongoing
If an external party provides unsolicited personal information that the School could not reasonably collect, this information will be destroyed unless prohibited by law.	All staff	Ongoing
Where personal information is provided to a 3 rd party, commitment will be sought from that party that this information will only be used for the express purpose for which it was provided (e.g. e-book provider, campsite)	Principal All Staff	Ongoing
Personal information will not be sent overseas unless appropriate commitments are obtained from the service provider (e.g. Office 365) or recipient that they will comply with the Australian Privacy Principles.	Principal All Staff	Ongoing
Staff will only access personal information via the secure password protected database or the locked file room. Staff will not otherwise store this data and files must not be removed from the School premises.	All staff	Ongoing