

## GOOD SHEPHERD LUTHERAN COLLEGE PRIVACY OF INFORMATION POLICY

This Privacy Policy applies to Good Shepherd Lutheran College NT and sets out how the College including each campus of the College manages personal information provided to or collected by it.

The College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. In relation to health records the College is also bound by the Health Privacy Principles contained in the *Health Records and Information Privacy Act 2002* (Health Records Act).

We may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing school environment.

### **What kinds of personal information do we collect and how is it collected?**

The type of information we collect and hold includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents and/or guardians before, during and after the course of a student's enrolment at the College;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the College.

***Personal Information you provide:*** We will generally collect personal information held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents and students provide personal information.

***Personal Information provided by other people:*** In some circumstances we 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.

***Exception in relation to employee records:*** The Privacy Act and Health Records and Information Privacy Act 2002, the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to our treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee.

## How do we use the personal information you provide?

We will use personal information collected from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection (which are reasonably expected), or to which you have consented.

***Students and Parents:*** In relation to personal information of students and parents, our primary purpose of collection is to enable the College to provide education for the student. This includes satisfying the needs of parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

The purposes for which the College uses personal information of students and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after students' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the College; and
- to satisfy the College's legal obligations and allow us to discharge our duty of care.

In some cases where we request personal information about a student or parent, if the information requested is not obtained, we may not be able to enrol or continue the enrolment of the student or permit the student 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, our 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 we use 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 funds and marketing for the College; and
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

***Volunteers:*** We also obtain personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable us and the volunteers to work together.

**Marketing and fundraising:** We treat marketing and seeking donations for the future growth and development of the College as an important part of ensuring that we continue to be a quality learning environment in which both students and staff thrive. Personal information held by us may be disclosed to an organisation that assists in the College's fundraising.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

**Exception in relation to related campuses:** The Privacy Act allows each campus, being legally related to each of the other campuses of the College to share personal (but not sensitive) information with each other. Other campuses may then only use this personal information for the purpose for which it was originally collected by the College. This allows campuses of the College to transfer information between them, for example, when a student transfers from one campus to another campus of the College.

### **Who might we disclose personal information to?**

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

- another school;
- government departments;
- medical practitioners;
- people providing service to our families, including outside of school hours care providers and direct debit agencies ;
- people providing services to the College, including specialist visiting teachers, counsellors and sports coaches and fee collection agencies;
- recipients of College publications, such as newsletters and magazines;
- parents;
- anyone you authorise the College to disclose information to; and
- anyone to whom we are required to disclose the information by law.

**Sending information overseas:** We 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 College exchange. However, a College 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.

## **How do we treat sensitive information?**

In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

## **Management and security of personal information**

Our staff members are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

We are committed to keeping secure your personal information from misuse, loss, unauthorised access, modification or disclosure. We have a range of policies and practices in place aimed at providing a secure environment. These measures are reviewed regularly to ensure their on-going viability. Security measures that we have implemented include, but are not limited to:

- educating our staff as to their obligations with regard to your personal information;
- requiring our authorised staff to use personalised passwords when accessing our systems;
- ensuring that the facilities and records containing personal information are protected on site by enhanced security measures including restricted access rooms, alarms and cameras;
- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised access to our systems; and
- practicing a clean desk policy.

Where information is no longer needed for any purpose, we ensure that it is effectively and securely destroyed or de-identified.

## **Access and correction of personal information**

Under the Commonwealth Privacy Act and Health Records Act, an individual has the right to obtain access to any personal information which we hold about them and to advise the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents, but older students 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 we hold about you or your child, you are required to contact the Principal in writing.

We may require you to verify your identity and specify what information you require. We may also 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, we will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

### **Consent and rights of access to the personal information of students**

We respect every Parent's right to make decisions concerning their child's education.

Generally, we will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. We will treat consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

As mentioned above, parents may seek access to personal information held by the College 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 our duty of care to the student.

We may, at our discretion, on the request of a student grant that student access to information held by the College about them, or allow a student 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 student and/or the student's personal circumstances so warranted.

### **Enquiries and complaints**

If you would like further information about the way we manage the personal information we hold, or wish to complain that you believe that we have breached the Australian Privacy Principles, please contact the Principal.

We 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.

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Version	Approved by Board Date	Author	Review
PN25.04.01	23 May 2017	College Principal	3 years