PRIVACY POLICY

Purpose
To provide guidelines in accordance with the Australian Privacy Principles under the Privacy Amendment Act 2012 regarding how:

- the School can collect, use, keep secure and disclose personal information
- individuals can access their personal information and correct errors.

Scope
This policy applies to all employees and volunteers of Good Shepherd Lutheran School with regards to all personal information about people that is collected by the school, including but not limited to information about staff, parents, students, prospective employees and contractors.

Definitions

Australian Privacy Principles are a set of legally binding principles under the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Personal Information
Personal information is information or an opinion (including information or an opinion forming part of a database), whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained from the information or opinion. This can take a number of forms including digital images.

Sensitive Information
Under the Act sensitive information means information or an opinion about an individual’s racial or ethnic origin; political opinion; membership of a political organisation; religious beliefs or affiliation; philosophical beliefs; membership of a professional trade organisation; membership of a trade union; sexual preferences or practices; criminal record, health and biometric information about an individual.

Employee Records
Certain acts or practices directly relating to employee records are exempt from the scope of the Act. Employee records are records relating to the employment of an employee of the employer. Examples of this type of information include the terms and conditions of employment, personal contract details, performance and conduct, disciplining, salary, termination and trade union membership.

Parents for the purposes of this policy includes parents and caregivers of a student or students.

Policy Statement

Good Shepherd Lutheran School is bound by the Australian Privacy Principles contained in the Privacy Amendment Act 2012.

We understand an individual’s right to keep their personal information private is highly important and are committed to protecting and maintaining the privacy, accuracy and security of all personal information collected by the School.

Procedures
The School may, from time to time, 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.

1. **What kind of personal information does the School collect and how does the School collect it?**

   The type of information the School collects and holds includes (but is not limited to) personal information, including sensitive information, about:
   - students and parents before, during and after the course of a student’s enrolment at the School;
   - job applicants, staff members, volunteers and contractors; and
   - other people who come into contact with the School.

   **Personal Information provided by you:** The School will generally collect personal information held about an individual by way of forms filled out by parents or students including digital forms, 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 the School 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:** Under the Privacy Amendment Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy 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.

2. **How will the School use the personal information you provide?**

   The School will use personal information it collects from you for the primary purpose of collection as stated below, and for such other secondary purposes that are reasonably expected and related to the primary purpose of collection, or to which you have consented.

   **Students and Parents:** In relation to personal information of students and parents, the School’s primary purpose of collection is to enable the School to provide schooling for the student. This includes satisfying the needs of parents, students, the Lutheran Education Australia and the School throughout the whole period the student is enrolled at the School.

   The purposes for which the School 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 and medical well being;
   - seeking donations and marketing for the School;
   - 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 student or parent, and the information requested is not obtained, the School 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, 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 funds and marketing for the School;
   - 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 and to satisfy the School’s legal obligations, for example, in relation to child protection legislation. Volunteers must abide by the Volunteers Policy which outlines their obligations regarding confidentiality and privacy of personal information.

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 be a quality learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to an organisation that assists in the School’s marketing and fundraising.

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

Who might the School disclose personal information to?

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

- another school;
- government departments;
- Lutheran Church of Australia (including all congregations and departments), Your own local denominational Congregation or Parish, Lutheran Education Australia and Lutheran Schools Association of SA/NT/WA;
- third party providers who manage our data bases;
- auditors;
- medical practitioners;
- dental clinic;
- people providing services to the School, including music teachers, specialists, visiting consultants, sports coaches and volunteers;
- recipients of School publications, like newsletters, magazines and School Handbook, ‘Communicate’;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required to disclose the information by law.

On occasions information such as academic and sporting achievements, student activities and other news may be published in the school newsletter, magazine, contact book (Communicate), school promotional material, newspapers, TV, special events, and our website.

Sending information overseas:

The School may disclose personal information about an individual to overseas recipients, when storing personal information with "cloud" service providers which are situated outside Australia or to facilitate a school exchange.

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.

How does the School treat 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 you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Any unsolicited information we could not have collected ourselves will be destroyed.

Management and security of personal information

The School’s staff are required to respect the confidentiality of students’ 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, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

The Australian Privacy Principles require the School not to store personal information longer than necessary and to destroy personal information no longer needed for the purpose it was collected unless required to be retained by law. Paper records are shredded, computerised records are deleted.

6. Updating personal information

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the School by contacting the Secretary of the School at any time.

7. Your rights to check what personal information the School holds about you

Under the Privacy Amendment 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. There are some exceptions to this right set out in the Act. Students will generally have access to their personal information through their parents, but older students may seek access themselves.

To make a request to access any information the School holds about you or your child, please contact the School Principal in writing.

The School may require you to verify your identity and specify what information you require. The School may 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, the School will advise the likely cost in advance.

If the School cannot provide you with access to that information, the School will provide you with written notice explaining the reasons for refusal and mechanisms for how to complain about the refusal.

8. Consent and rights of access to the personal information of students

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 student to the student’s parents. The School 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.

Parents may seek access to personal information held by the School about them or their child by contacting the School Principal or his/her nominee. 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 student.

The School may, at its discretion, on the request of a student grant that student access to information held by the School 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 warrant it.

9. Enquiries and Complaints

If you would like further information about the way the School manages the personal information it holds, or wish to complain that the School has breached the Australian Privacy Principles please contact the School Principal or his/her nominee. The School will investigate any complaint and will notify you of the decision in relation to your complaint as soon as practicable after it has been made.

10 Information Collection Notice

The School will provide an Information Collection Notice (See Appendix 1) to all parents via the enrolment process, the school handbook ‘Communicate’ and on request to job applicants, contractors and volunteers.

The School will send out a Release of Information Form (Appendix 5) annually.

Implementation Responsibilities
The principal and staff will ensure:

- All personal and sensitive information about people that is collected, stored, updated and handled by the school is done so in accordance with the school’s Privacy Policy;
- An Information Collection Notice is given to all persons for whom the school collects personal information;
- The Privacy Policy is available to anyone who asks for it;
- Due diligence is carried out on any third party providers that we disclose information to, to ensure that they will handle that personal information in accordance with the Australian Privacy Principles; and
- Ongoing compliance (e.g. regular review of information handling practices, conduct audits when necessary, update privacy policy and collection notices).
- Photos taken of students during any activity are to be downloaded onto the School network. Any photos of students taken on personal devices must also be downloaded onto the school network and then deleted from the device.

References/Related Policies

Record Management Policy
Volunteers Policy
Excursion Policy

Further information about the Australian Privacy Principles can be obtained via the government web site: http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-17-australian-privacy-principles


Forms

Enrolment form
Information Collection Notice for Parents (given out with the Enrolment form)(Appendix 1)
Employment Collection Notice (Appendix 2)
Contractor/Volunteer Collection Notice (Appendix 3)
Music Teacher Collection Notice (Appendix 4)
Forms for Job Applicants/Contractors/Volunteers
Release of Information Form (Appendix 5)
Appendix 1

Good Shepherd Lutheran School (Privacy Policy)

Information Collection Notice for Parents / Caregivers

1. The School respects the privacy of personal and sensitive information regarding your family. The School collects personal information, including sensitive information about the student and parent(s) or guardian(s) before and during the course of a student's enrolment at the School. The primary purpose of collecting this information is to enable the School to provide schooling for your child. A copy of the School's privacy policy is available at the School during school hours.

2. In the case of students transferring from another school, we may make contact with the previous school to gain relevant information to assist us in making the best decision for the student.

3. In situations where parents are separated, it is the policy of the School to release school reports to the mother and father of the student upon request. It is also our policy to allow both the mother and father to attend parent/teacher interviews upon request. However, the School will abide by any court orders which prevent the release of such information.

4. Some of the information the School collects is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.

5. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Amendment Act 2012. We may ask you to provide medical information or medical reports about your child from time to time.

6. The purposes for which the School uses personal information of job applicants, staff members, volunteers 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 School, or to satisfy the School's legal obligations, for example, in relation to child protection legislation.

7. The School from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes to other schools, government departments, Lutheran Education Australia, Lutheran Schools Association SA/NT/WA, Lutheran Church of Australia (including all congregations and departments), your own local denominational congregation or parish, medical practitioners, dental clinic, and people providing services to the School including third party data management organisations, auditors, specialist visiting consultants, sports coaches and volunteers.

8. In the event of default of payment of fees, the School may refer the default to a debt collection agency. If this occurs, personal information will be disclosed to the agency and you will be responsible for the collection costs.

9. The School from time to time is required to disclose personal and sensitive information in order to comply with the law or to report matters to the relevant persons or authorities.

10. If we do not obtain the information referred to above, we may not be able to enrol or continue the enrolment of your child or allow your child to participate in a particular activity.

11. Personal information, including photos, is regularly disclosed to the school community. On occasions information such as academic and sporting achievements, student activities and other news is published in the school newsletter, magazine, school promotional material, brochures, newspapers, cinema, TV, special events, and our website.

12. Parents or guardians may seek access to personal information collected about them and their child by contacting the School. 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 student, or where students have provided information in confidence.

13. As you may know the School from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. We will not disclose your personal information to third parties for their own fundraising purposes without your consent.

14. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you 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.

15. Unless otherwise specifically directed, personal contact details collected from each family will be disclosed in our ‘Communicate’ each year for the purpose of communication within our school community.

16. You may opt out of any direct marketing by contacting the School secretary. This may include flyers for holiday activities by third parties, vouchers, sports clinic flyers etc.
Appendix 2

Good Shepherd Lutheran School (Privacy Policy)

Employment Collection Notice

1. In applying for this position you will be providing Good Shepherd Lutheran School and with personal information. We can be contacted at PO Box 121 Modbury North, admin@gspv.sa.edu.au, or by phone on 82647966.

2. 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.

3. If you are successful in gaining permanent employment or a contract at Good Shepherd Lutheran School, your personal information will be kept permanently. Otherwise this information may be stored for up to 5 years.

4. You may seek access to your personal information that we hold about you if you are unsuccessful for the position. 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.

5. We will not disclose this information to a third party without your consent. We may disclose this kind of information (as appropriate) to government departments, Lutheran Schools Association (LSA), medical practitioners and people providing services to the School, including third party data management organisations, specialist visiting teachers, coaches and volunteers.

6. If you provide us with the personal information of others, we encourage you to inform them you are disclosing that information to us and why, that they can access that information if they wish, that we do not usually disclose the information to third parties, and that we may store their information for up to 5 years.
Appendix 3

Good Shepherd Lutheran School (Privacy Policy)
Contractor/Volunteer Collection Notice

1. In applying to provide your services you will be providing Good Shepherd Lutheran School with personal information. We can be contacted at PO Box 121 Modbury North, admin@gspv.sa.edu.au, or by phone on 82647966.

2. 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. We may also make notes and prepare a confidential report in respect of your application.

3. You agree that we may store this information for up to 5 years.

4. Access to this information may be available to you if you ask us.

5. We will not disclose this information to a third party without your consent.

6. If you provide us with the personal information of others, we encourage you to inform them you are disclosing that information to us and why, that they can access that information if they wish, that we do not usually disclose the information to third parties, and that we may store their information for up to 5 years.
Appendix 4

**Good Shepherd Lutheran School (Privacy Policy)**

**Music teacher Collection Notice**

1. As a peripatetic music teacher you will be providing Good Shepherd Lutheran School and with personal information. We can be contacted at PO Box 121 Modbury North, admin@gsvp.sa.edu.au, or by phone on 82647966.

2. 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.

3. We may store this information for up to 5 years.

4. You may seek access to your personal information that we hold about you if you are unsuccessful for the position. 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.

5. We will not disclose this information to a third party without your consent. We may disclose this kind of information (as appropriate) to government departments, Lutheran Schools Association (LSA), medical practitioners and people providing services to the School, including third party data management organisations, specialist visiting teachers, coaches and volunteers.

6. If you provide us with the personal information of others, we encourage you to inform them you are disclosing that information to us and why, that they can access that information if they wish, that we do not usually disclose the information to third parties, and that we may store their information for up to 5 years.
Appendix 5

**Good Shepherd Lutheran School (Privacy Policy)**

**Release of Information Form**

I/we consent to my/our basic family details: (please tick)

- Name
- Address
- Mobile number
- Home number

being included in the annual Communicate Book.

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I/we consent to the publication of information and images featuring the achievements and activities undertaken by my/our child/ren. Examples of such publications include, but are not limited to, newsletters, magazines, LENS publications, concert videos, the school website and newspapers.

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