



Good Shepherd  
*Lutheran School*  
A N G A S T O N

# Privacy Policy

## **Rationale**

The privacy of all members of the Good Shepherd Lutheran School community is important to us. The purpose of this policy is to make explicit the way in which Good Shepherd Lutheran School uses personal information provided to or collected by it.

The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act.

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

The type of information the school collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Students and parents and/or guardians (**'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 you provide:** The school 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 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 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.

### **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, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, 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, the needs of the student and the needs of 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/caregivers include:

- To keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- Day-to-day administration of the School;
- Looking after students' educational, social and medical well being;
- 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 student or parent, if the information requested is not provided, the School may not be able to enrol or continue the enrolment of the student, or permit the student

**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 function or to 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 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 fundraising, for example, the School's Foundation or Alumni Organisation.

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, 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;
- Medical practitioners;
- People providing services to the school, including specialist visiting teachers, counsellors and sports coaches;
- Recipients of school publications, such as newsletters and magazines;
- Parents; and
- Anyone you authorise by the School to disclose information to; and
- Anyone to whom we are required to disclose 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. 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.

### **How does the School treat sensitive information?**

In referring to 'sensitive information', the School means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, 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**

The School's staff are required to respect the confidentiality of student's and Parent's 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, 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. Students will generally be able to access and update their 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 the School holds about you or your child, please contact the 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 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**

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.

As mentioned above, Parents may seek access to personal information held by the School about them or their child by contacting the School 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 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 so warranted.

### **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 you believe that the School has breached the Australian Privacy Principles please contact the Principal. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

References:

Privacy Compliance Manual

- Independent Schools' Council of Australia
- Minter Ellison Lawyers.

This policy was ratified by G.S.L.S Council May 2014

## Good Shepherd Lutheran School Collection Notice



Good Shepherd  
Lutheran School  
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1. Before, and during the course of a student's enrolment at the School, the School may require personal information, including sensitive information about pupils and parents or guardians. The primary purpose of collecting this information is to enable the School to administer educational services for your child
2. The School protects the information it holds about students and parents against loss, misuse, unauthorized access or disclosure by way of locked filing cabinets for paper documents, and password protected access for computer files.
3. If we do not obtain the information referred to in this collection notice policy, your child may be excluded from some aspects of school life, and we may not be able to enroll or continue the enrolment of your child.
4. Information will generally be collected by way of forms filled out by the Student or Parent(s), face to face meetings, email or over the telephone. On occasion, information may be provided by a third party such as another School, Government Agency, or Medical Professional.
5. Health information is regarded as sensitive information under the Federal Privacy Act 1998. We may ask you to occasionally provide medical reports about your child.
6. The School is required by law to comply with Public Health and Child Protection Laws, which necessitate the collection of certain information to enable the School to discharge its duty of care.
7. From time to time the School may seek from, and or discloses to third parties, personal information which may be of a sensitive nature for administrative, educational and pastoral purposes. Third parties may include other schools, government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, sporting coaches and volunteers.
8. In relation to your enrolment application, the School may, at its sole discretion, seek information from, and disclose information to other schools, or financial institutions named in your application for the purpose of assessing your application.
9. In the event that the Parent or Guardian is in default in relation to the payment of school fees, the School may disclose contact details and account status information to a third party for the purpose of collecting outstanding accounts.
10. The School regularly engages the services of a professional photographer to take photographs of the students which are available for your purchase. In addition, the School will occasionally take photographs of various activities around the School for inclusion in school publications and on the school website. If for any reason you do not give consent for photographs of your child to be used in this manner, you must notify the School in writing.
11. From time to time, we may disclose images, or information relating to our students' achievements in school newsletters, magazines, and on our website. There may also be occasions where aspects of student life are broadcast on other public media.
12. Where you have provided emergency contact details of others, such as doctors, you should inform them of that fact, and let them know that they are able to access that information if they wish.
13. Subject to part 14 of this agreement, in situations where parents are separated, it is the policy of the School to release school reports to both parents, and allow both parents to attend parent teacher interviews upon request.
14. Parents or students may seek access to their own personal information collected by the School by requesting access in writing to the School. However, there will be some occasions when access is denied, such as:
  - (i) When access would have an unreasonable impact on the privacy of others,
  - (ii) Where access may result in a breach of the School's duty of care to the pupil;

- (iii) Where pupils have provided information in confidence
- (iv) Where access to the information would contravene to an order made by a competent authority (eg a Court)

15. We will not disclose your personal information to third parties for their own marketing purposes, however we may keep records of your contact information for the purpose of appealing to you directly, or via an organisation that is assisting us in a fundraising activity.

I/We hereby certify that I/we have read the above information along with the Privacy Policy and give consent to the School to collect and disseminate personal and sensitive information in accordance with this Policy for the duration of the enrolment of my / our child at the School.

Signed: \_\_\_\_\_ Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Applicant 1 Applicant 2

Print Family Name: \_\_\_\_\_