

ADELAIDE CHRISTIAN SCHOOLS

A ministry of Adelaide Christian Centre

Privacy Policy

The terms College and School are used interchangeably

Level	Operational
Category	Finance and Administration (FIN_ADM)
Reference Number	FIN_ADM 209
Number of pages	8
Date authorised	June 2014
Authorised by	ACS School Council
Monitored by	Senior Leadership Executive (SLE)
Review Date	June 2017
Reviewed by	Leadership
Status	Approved
Version History	
1.	<i>Reviewed & Updated June 2014</i>
2.	
3.	

Adelaide Christian Schools

Chair of Authorising Body	<i>Signature</i>	<i>Dated</i>
Head of Schools	<i>Signature</i>	<i>Dated</i>

Policy Statement

Your privacy is important.

The Adelaide Christian Schools will comply with the Australian Privacy Principles contained in the *Privacy Act 1988* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

This policy outlines and hereby ensures we at Adelaide Christian Schools collect, store, use, access, correct and disclose information about people responsibly and wisely.

The school has adopted the AISSA Privacy Policy as its base document for its Privacy Policy.

A Privacy Audit document is available for management of ACS.

Definitions

Personal Information means information or an opinion (including information or opinion on a database) whether true or not true, about an individual and that identifies or reasonably identifies the individual, regardless of its source and whether the information is recorded in a material form or not.

Sensitive Information is a type of information that is given extra protection and must be treated with additional care. It can include information or opinion about an individual's racial or ethnic origin, political opinions, membership of a professional association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It can include health information and biometric information.

Health Information is a subset of sensitive information – any information or opinion about the health or disability of an individual.

Records: The Privacy Act regulates personal information contained in a 'record'. A 'record' is defined as a document, electronic or other device (however kept), a photograph or other pictorial representation or anything from which sounds, images or writings can be reproduced.

Types of Information Collected

The types of Information the school collects and holds includes (but is not limited to) personal information, including 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 ACS schools.

1. Personal Information you provide:

The school will generally collect personal information held about an individual by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, and telephone calls. On occasions people other than Parents and pupils provide personal information.

2. 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.

3. 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.

Information Usage

How will the School use the personal information you provide?

At the Privacy Officer's discretion, 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, or to which you have consented.

- 1. 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 schooling for the pupil. This includes satisfying both the needs of Parents and the needs of the pupil throughout the whole period the pupil is enrolled at the School.

The purposes for which the School uses personal information of pupil 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 pupil's education, social and medical wellbeing;
- Seeking donations and marketing for the School;
- To satisfy the School's legal obligations and allow the School to discharge its duty of care.

Please note that in relation to marketing and fundraising, the information received from individuals or parents may be used to make an appeal to them. It may also be disclosed to organisations that assist in the School's fundraising activities such as the Parents and Friends. School publications, such as newsletters and magazines may also be used for marketing purposes.

In some cases where the School requests personal information about a pupil or Parent, if the information requested is not obtained, the School may not be able to enrol or continue the enrolment of the pupil.

- 2. 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) 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 in the case may be;
 - For insurance purposes;
 - To satisfy the School's legal obligations, for example, in relation to the child protection legislation.
- 3. 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.

Information Disclosure

Who might the School disclose personal information to?

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

- Another school
- The Association of Independent Schools of South Australia (AISSA)
- insurers
- Government departments
- Medical practitioners
- People providing services to the School, including specialist visiting teachers and sports coaches;
- Recipients of School publications, like newsletters and magazines;
- Parents; and
- Anyone the individual authorises the School to disclose information to;
- Anyone to whom the School is required to disclose information to by law.

Sending information overseas: The School will not send personal information about an individual outside Australia without:

- Obtaining the consent of the individual (in some cases consent will be implied);
- Please note that some overseas countries may not provide the same level of protection of personal information provided by the Australian Privacy Principles. The School will use its best endeavours to protect the personal information disclosed to overseas recipients but will not be responsible for any breach of privacy by the overseas recipient.

Treatment of Sensitive Information

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 criminal record, that is also personal information; health information and biometric information about an individual..

This information will be used only for the purpose for which it was provided or a directly related secondary purpose, unless an individual or parent agrees otherwise or unless the disclosure 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, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and pass worded access rights to computerised records.

The School may store personal information in a secure off-site facility which may mean that it resides on servers which are situated outside Australia.

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 School Office at any time.

The Australian Privacy Principles require the School not to store personal information longer than necessary.

Your Rights Regarding 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. There are some exceptions to this right set out in the act. Pupils will generally have access to their personal information through their Parents, but older pupils 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 identify and specify what information you require. The school may charge you 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.

Consent and Rights of Access of Pupil's Information

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.

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 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 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 School Principal or administration office on 8351 9322. The School will investigate any complaint and will notify you of its decision as soon as practicable.

EMPLOYMENT COLLECTION NOTICE

1. In applying for this position you will be providing the School with personal information. We can be contacted at the Central Administration Office:

Suite 6, 2-4 Henley Beach Road, Mile End, 5031

Phone: 8405 0900

Email:

2. If you provide us with personal information, for example your name and address or information contained in your resume, we will collect the information to assess your application.
3. You agree that, if your application is not successful, we may store this information for **6 months**.
4. 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, or correction of, 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.
6. We are required to conduct a criminal record check, collect information regarding whether you are or have been the subject of an AVO (Apprehended Violence Order) or an Intervention Order and certain criminal offences under Child Protection laws.
7. The School may store personal information in a secure off-site facility, which may mean that it resides on servers which are situated outside Australia.
8. If you provide us with the personal information of others i.e. referees, 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, that the School does not usually disclose the information to third parties and that we may store the information for 6 months.

COLLECTION OF INFORMATION FROM FAMILIES

1. 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. The primary purpose of collecting this information is to enable the School to provide schooling for your son/daughter.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
3. Certain laws governing or relating to the operation of schools require that certain information is collected. These include Public Health and Child Protection Laws.
4. Health information about pupils is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We ask you to provide medical reports about pupils from time to time.
5. At the Privacy Officer's discretion, the School from time to time discloses personal information to others for administration and educational purposes. This includes to other schools, the Association of Independent Schools of South Australia (AISSA), insurers, government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, sports coaches and volunteers.
6. If we do not obtain the information referred to above we may not be able to enrol or continue the enrolment of your son/daughter.
7. Personal information collected from pupils is regularly disclosed to their parents or guardians. On occasions information such as academic and sporting achievements, pupil activities and other news is published in School newsletters and magazines. The School may store personal information in a secure off-site facility which may mean that it resides on servers which are situated outside Australia.
8. The School's Privacy Policy contains information about how parents may seek access to, or correction of, personal information collected about them and their son/daughter by contacting the School. Pupils may also seek access to personal information about them. However, there will be occasions when access is denied. Such occasions would include 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.
9. We may include your contact details in a class list. Permission will be sought for publication of these details.
10. The School's Privacy Policy contains information about how you may complain about a breach of the Australian Privacy Principles and how the School will deal with a complaint.
11. From time to time the School engages in fundraising or marketing activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities such as the Parents and Friends. School publications, such as newsletters and magazines may be used for marketing purposes.

12. Information about students' academic achievements, sporting and cultural activities is regularly published in the School's newsletters, magazines and on the School's website.
13. 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 information to the School and why; that they may access that information if they wish; and that the School does not normally disclose that information to third parties.

CONTRACTOR/VOLUNTEER COLLECTION NOTICE

1. In applying to provide services you will be providing the School with personal information. We can be contacted at the Central Administration Office:

Suite 6, 2-4 Henley Beach Road, Mile End, 5031

Phone: 8405 0900

Email:

2. If you provide us with personal information, for example your name and address or information contained in your resume, we will collect the information to assess your application.
3. You agree that we may store this information indefinitely (and for a minimum of 7 years) after you cease providing services to the School.
4. 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, or correction of, 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 information to a third party without your consent.
6. We are required to conduct a criminal record check, collect information regarding whether you are or have been the subject of an AVO (Apprehended Violence Order) or an Intervention Order and certain criminal offences under Child Protection laws.
7. The School may store personal information in a secure off-site facility, which may mean that it resides on servers which are situated outside Australia.
8. If you provide us with the personal information of others i.e. referees, 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, that the School does not usually disclose the information to third parties.