



For Christ's Crown & Covenant

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## **Privacy Policy**

**Administration**

**Web Version 2.0**

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## 1 Purpose

The purpose of this policy is to ensure Covenant Christian School (the School) meets the requirements of the Australian Privacy Principles (APP) contained in Schedule 1 of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988. The School is committed to upholding these Principles in relation to the privacy of staff, students and parents of the School. Privacy is respected at the School as it reflects concern for creating and maintaining safe relationships for those involved in the School community. The protection of confidential information relating to others is a serious moral, professional, ethical and legal responsibility that the School recognises and upholds.

Covenant Christian School is committed to its Vision and Mission:

**Vision:**

In dependence on God's grace, Covenant Christian School will nurture and equip students with a heart to glorify God by serving Him and living according to His Word.

**Mission:**

Covenant Christian School is a safe, caring and loving community. In partnership with parents we cultivate Christian character in our students and equip them to serve God and contribute positively to society.

This will be achieved through a Christ-centred approach where the gospel is central. God's Word is applied to all areas of learning and experience. Students and staff are challenged, encouraged and supported to love learning and pursue excellence to the glory of God.

## 2 Organisational Scope

This policy is School-wide and includes the Early Learning Centre.

## 3 Definitions

For purposes of this policy, unless otherwise stated, the following definitions shall apply:

APP	Australian Privacy Principles as defined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012
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#### 4 Policy Content and Guidelines

The School respects the confidentiality of staff, students and parents' personal information and the privacy of individuals. The School will employ measures to secure and safeguard this information and in particular relating to the children within its care<sup>1</sup>

The School will implement reasonable practices, procedures and systems relating to its activities and functions to ensure that the School:

- (a) complies with the Australian Privacy Principles (APP) and
- (b) is able to deal with inquiries or complaints from individuals about the School's compliance with the APP.

#### 5 Kinds of personal information that the School collects and stores

The School will only collect information that is reasonably necessary for one or more of the entity's functions or activities.

Where the information is sensitive, the School will only collect information about an individual if:

1. the information is reasonably necessary for one or more of the School's functions or activities, or
2. the collection of the information is required or authorised by or under an Australian law or a court / tribunal order
3. the School reasonably believes the collection is necessary to lessen or prevent a serious threat to the life, health or safety of a student, or to public health or safety, or
4. the School is an organisation and a health situation exists and this information is required to care for the student.

The types of information that the School collects is:

1. Information provided on the enrolment application form
2. Updated personal information from parents about their children and their family
3. Student academic results, the National Assessment Plan – Literacy and Numeracy, and other standardised test results and reports to parents
4. Behaviour and other notes by teachers, records of incidents involving students and any associated correspondence with parents and others involved
5. Medical incident records including first aid administered
6. Attendance records including reasons for absence/partial absence
7. Financial information associated with tuition and other payments, any applications for Tuition Fee Assistance, and Centrepay deduction applications
8. Staff personal information as captured by the Teacher Application Form and associated documentation, and
9. Staff personnel records including professional learning, payroll and superannuation records, probation and appraisal and other employment related correspondence.

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<sup>1</sup> Child-Safe, Child-Friendly Canberra: <https://hrc.act.gov.au/wp-content/uploads/2018/07/Child-Safe-Child-Friendly-Canberra-Information-Resource-1.pdf>

### **5.1 How personal information is collected and stored**

1. Through various forms such as Enrolment Form and the Teacher Application Form. Completed forms are held in a secure file accessible only to authorised staff. Relevant information is transcribed onto the PCSchool School Management System software database.
2. A secure personnel file is retained in a lockable filing cabinet located in the school office on each staff member to store relevant documents such as probation reports, TQI Professional Learning summaries and Leave applications.
3. Staff members provided with confidential documentation relating to students or families should present the documentation to the Principal so that it can be retained on the confidential individual files.
4. Notes are placed on PCSchool and/or may be kept by the teacher in their personal records.
5. Academic results will be kept in the individual teacher's records and on the school file server and may be transcribed into PCSchool along with comments and other aspects involved in producing student reports.
6. Copies of student academic reports are retained electronically on the school server.
7. All highly confidential information relating to any current or past parents, families, students or staff members will be maintained in individual files in the College Office, and can only be accessed by staff with the Principal's approval.
8. Copies of correspondence may be kept either in electronic form such as email or as a paper copy on the relevant student, staff member, or other file.

### **5.2 Anonymity and Pseudonymity**

1. Individuals have the option of not identifying themselves, or of using a pseudonym, when dealing with the School
2. However, this does not apply if:
  - the School is required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves; or
  - it is impracticable the School to deal with individuals who have not identified themselves or who have used a pseudonym.

### **5.3 The purpose of collecting, holding and disclosing personal information**

1. The School will only request information from families and staff members that is required by ACT or Commonwealth law or a statutory authority or that in the opinion of the School is relevant to the education or safety of the its students.
2. Staff are required to maintain confidentiality with reference to students, staff and family records and information. Staff are reminded regularly of these requirements.
3. Staff will not be drawn into discussions about students, families or staff, with any third person or agency, which has no legal or compelling need to discuss such issues.

4. Access to student, staff and family records will be given to staff on the authorisation of the Principal and where required by law and/or a statutory authority.
5. The School seeks disclosure by families of all information that may impact on the education or safety of their child.
6. The School will release private information to Government authorities as required by law, for example. in order to apply for or secure Commonwealth funding.
7. At the time of collecting information, parents and/or guardians will be notified of the intended and possible uses of that information. Where it is intended to use information for a purpose for which parents have not previously agreed, consent will be requested from a parent and/or guardian in advance of the proposed use.
8. Staff members are to direct any requests for confidential information to the Principal.
9. While staff members may have confidential discussions with others, including students, all staff members are compelled by law to report all disclosures identified under Mandatory Reporting. (Refer to Child Protection Policy and Sexual Harassment Policy)
10. The Principal will thoroughly investigate any alleged breaches of confidentiality or privacy.
11. All students are reminded regularly of their responsibilities relating to their own confidential information, and the confidentiality rights of others.
12. The School will not disclose personal information to an overseas recipient without the express written permission of the individual concerned.

#### **5.4 How personal information may be accessed and, if necessary, corrected**

1. An individual has the right to request access to their personal information. The individual should approach the Principal or Privacy Officer, or their delegated representatives and request access to their personal information. The Privacy Officer will make arrangements for this to take place at a mutually convenient time and place. Any costs involved may be invoiced to the individual.
2. Any corrections may be requested in writing (including by email) to the Principal or Privacy Officer, who will arrange for the necessary corrections to be made. Some data can be corrected via the family portal that enables parents' access to their contact details via the internet.

#### **5.5 How a complaint about a breach of the Australian Privacy Principles may be made**

1. A complaint relating to a possible breach of the APP by the School is to be lodged with the school's Privacy Officer who will carry out an investigation and provide a written report to the complainant within five working days. The complaint should be processed under the procedures outlined in the School's Complaints Policy.
2. If relevant, the report shall make recommendations to improve the Privacy Policy or the Complaints Policy and Procedures. These recommendations shall be presented to the School Council for review / approval at the earliest opportunity.
3. If the person is not satisfied that their information has been updated or updated correctly, they should contact the Principal. If they are still not satisfied after contacting the Principal, then they may make a complaint to the Australian Privacy Commissioner.

### **5.6 Staff Training**

Staff and volunteers will receive regular training on the requirements of this policy.

## **6 Legislative Compliance**

The School is required to manage its policy documentation within a legislative framework. The legislation directing this policy is the:

- Privacy Amendment (Enhancing Privacy Protection) Act 2012 [link](#)

## **7 References**

- Privacy Fact Sheet 17 'Australian Privacy Principles', January 2014, from the Office of the Australian Information Commissioner. [link](#)
- Complaints Policy

## **8 Appendices**

Nil

## **9 Approval Agency**

The School Council.

## **10 Policy Sponsor**

Privacy Officer

## **11 Contact Person**

The following person may be approached on a routine basis in relation to this policy:

Principal

Tel. (02) 6294 2455 Ext 102