



For Christ's Crown & Covenant

Privacy Policy

Operational

Category A

Version 3.0

13 March 2025

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1 Purpose

The purpose of this policy is to ensure that Covenant Christian School (the School) meets the requirements of the Australian Privacy Principles contained in the Commonwealth 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.

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
Personal Information	Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.
Privacy	Is the right of a person to be free from intrusion into or publicity concerning matters of a personal nature, called also right to privacy.
Record	A record includes: (a) a document, or (b) an electronic or other device.
Sensitive Information	Sensitive information in the context of a school setting means: (a) information or an opinion about an individual's: (i) racial or ethnic origin (ii) political opinions (iii) membership of a political association (iv) religious beliefs or affiliations (v) philosophical beliefs, or (ix) criminal record that is also personal information, or (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information.

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, the children within its care¹.

The School will implement reasonable practices, procedures and systems relating to its activities and functions to ensure that (a) the School complies with the Australian Privacy Principles (APP) and (b) the School is able to deal with inquiries or complaints from individuals about its compliance with the APP.

4.1 *Kinds of personal information that the School collects* ²

1. Information provided on the enrolment application form, including name, date of birth, address and mobile number of the proposed student, Church affiliation (if any), names and dates of birth of siblings, whether the child is the natural child of both parents, any court orders and custody arrangements, names of both parents, dates of birth and addresses
2. Updated personal information from parents about their children and their family
3. Student academic results, NAPLAN 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 information and medical incident records including where first aid is administered
6. Attendance records including reasons for absence/partial absence
7. Financial information associated with tuition and other payments, any applications for Tuition Fee discount and / or Tuition Fee subsidies, and Centrepay deduction applications
8. Staff personal information as captured by the Teacher Application Form and associated documentation
9. Staff personnel records including professional learning, payroll and superannuation records, probation and appraisal and other employment related correspondence, and
10. Records such as those which include staff mobile phone numbers (such as risk assessments).³
11. Photos of students and staff.

The School does not collect sensitive information about a person unless the person consents to providing this information and the collection is reasonably necessary for one or more of the

¹ Child-Safe, Child-Friendly Canberra. [link](#)

² APP 1.4(a)

³ Note: These are internal documents used to assess the risk of various activities, including excursions. These are internal documents and will only be given to external organisations such as Worksafe ACT and the AFP as required by law.

School's functions or activities.⁴ The collection of any sensitive information will be done by lawful and fair means.⁵

If the School receives unsolicited sensitive information about a person, it will quickly determine whether it could have collected the information if it had requested it. If it could not have collected that information the School will destroy the information if it is lawful to do so, or ensure that the information is de-identified.⁶

If the School collects or receives information from someone other than the person to which the information applies, or the person may not know that the School has collected or received this information, where it is reasonable in the circumstances, the School will notify the person about this information as soon as possible.⁷

Unless required to by law, the School will not collect or apply government identifiers of staff or students.⁸

4.2 How personal information is collected and stored⁹

1. Through various forms such as Enrolment Form, Teacher Application Form, etc. Completed forms are held in a secure file accessible only to authorised staff. Some information is transcribed onto the FACTS School Management System software database.
2. A secure personnel file on each staff member is retained in a lockable filing cabinet located in the School office to store relevant documents such as probation reports, TQI professional learning summaries, leave applications and so on. Recent material is electronic and stored in a secure folder.
3. Information about each staff member such as address, next of kin and phone numbers are available on FACTS for administration staff to view. In order to comply with the Australian Privacy Principles, staff are asked to give permission for some of this information to be available to all staff, (eg contact details).
4. Staff and parents (and by inference, their children) have the option of anonymity, or of using a pseudonym. However, this does not apply where the School is required or authorised by Australian law, or a court order, to deal with a person using their correct name, or in situations where it is impracticable for the School to deal with persons who prefer to remain anonymous or who prefer to use a pseudonym. In these cases, the School will inform the staff member or parents.
5. Notes are placed on FACTS and/or may be kept by the teacher in their personal records.

⁴ APP 3.2 and 3.3.

⁵ APP 3.5

⁶ APP 4. In these circumstances the School will seek advice from the Commonwealth Privacy Commissioner.

⁷ APP 5. An example of where it may not be reasonable to inform the person would be where it is a police or court matter.

⁸ APP 9.

⁹ APP 1.4(b)

6. Academic results will be kept in the individual teacher's records and on the Google Education Platform and may be transcribed into FACTS along with comments and other aspects involved in producing student reports.
7. Copies of student academic reports are retained electronically on FACTS.
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.
9. Student attendance records are collected for reporting to the Commonwealth Department of Education, Skills and Employment.
10. Financial records are kept on payment of fees by families so that correct accounting of School finances occurs.
11. Centrepay deduction records are kept to reconcile fee payments.

4.3 The School's purpose for collecting, holding and disclosing personal information¹⁰

1. The School will only request information from families and staff members that is required by Law or Statutory Authority or where, in the opinion of the School, this information is relevant to the education of its students.
2. Staff are required to maintain confidentiality with reference to student, staff and family records and information.
3. Access to student, staff and family records will be given to staff on the authorisation of the Principal and where required by law and statutory authority.
4. The School seeks disclosure by families of all information that may impact on the education of their child.
5. The School will release private information to Government authorities as required by law, e.g. in order to secure Commonwealth funding.
6. At the time of collecting information parents will be notified of the intended and possible uses of that information. Where it is intended to use information for a purpose that a parent was not originally informed, consent will be requested from a parent and/or guardian in advance of the proposed use.

4.4 How personal information may be accessed and, if necessary, corrected

1. An individual is to approach the Principal or the Business Manager, or their delegated representatives, and request access to their personal information. The officer of the School 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 (or email) to the Principal or delegated person, 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.¹¹
3. If, for a valid reason, the School refuses to correct the personal information, the person is entitled to add a statement which will be available to all authorised users of the file.¹²

¹⁰ APP 1.4 (c)

¹¹ APP 1.4(d)

¹² APP 13.4.

If a person asks to add a statement, the School will attach it to the file within 30 days of receiving the statement, and will not charge the person for doing so.¹³

4. The School will ensure, as far as is reasonably practicable, that the personal information it collects is accurate, and will ensure that it provides any corrections to associated third parties where it is lawful to do so.¹⁴

4.5 Information should be used for the reason it was collected.¹⁵

If the School has collected information for a specific purpose, it will not use this information for another purpose unless:

- the individual has consented to the use or disclosure of this information
- the other purpose is related to the specific purpose
- the information is required to be used or disclosed under Australian law or a court or tribunal order
- the information is required for an existing health situation at the School or related to the School, or
- the School reasonably believes that it is necessary for an enforcement activity by an enforcement body.

The School will make a written note about the disclosure of information in these circumstances.

The School will not disclose personal information for the purpose of direct marketing.

4.6 Security of personal information¹⁶

The School will take necessary measures to protect the personal information it collects, from misuse, interference or loss, and from unauthorised access, modification or disclosure.

This includes a folder that is only accessed by the School Senior Executive and the Administration Team.

4.7 Taking and publishing photos of staff, students and parents

Photographs and films of individuals are considered personal information, and as such, are protected by privacy law in the same way as other personal information.

4.7.1 Staff taking photos of other staff and students

The use of cameras (including mobile phone cameras or similar) by students at the School or on excursions is prohibited unless prior permission has been granted by the School Executive and the written permission of parents of the intended subjects.

The parents' written permission form will include whether the parents give permission for the photos to be used in School publications and media.

Staff also have the right to decide whether or not they give permission to have their photo taken at School or at School events, and what can be done with this image.

¹³ APP 13.5

¹⁴ APP 13.

¹⁵ APP 6.

¹⁶ APP 11.

Where staff take photos of students (with the written permission of parents) on their own phones, camera or other device, these must be downloaded within 48 hours to the School drive and deleted from their own device.

Cameras (excluding mobile phone cameras or similar) will be allowed at camps and/or extended excursions (e.g. Sydney) with the proviso that photos of staff, parents and students will not be uploaded to the internet via any social networking website e.g. Facebook, etc. without the express written permission of the School and the individual involved.

4.8 *Parents taking photos of staff and students at School events*

Parents may take photos of staff and students at School events for their own private use, but must not upload photos of staff and students, with the exception of their own child, to social media.

However, parents must not take photos of students (other than their own children) at School events unless they have the permission of the parents of these students.

However, where the School is participating in the annual Swimming Carnival, the Lakeside Leisure Centre Pool's policy is that no photography is allowed at the pool at any time.

This ban on photography is consistent with this Policy and Child Protection Policies. Therefore, the School will remind parents to comply with this ban, including not taking photos of their own children in the Lakeside Leisure Centre.

4.9 *Photos of staff and students in School publications and social media*

School parents, carers and staff are to be asked for their permission to publish photos on the internet, social media sites, and in School publications. However, where a student or students are subject to a 'do not publish' the School will not publish. All teachers are made aware of the Do Not Publish list.

4.10 *Official School Photos*

The School engages a professional photographic company annually to take class photos, staff photos and individual photos of students and staff. The School ensures that a confidentiality clause relating to appropriate information handling is included in the contract between the photographer and the School.

5 *Complaint about a Possible Breach of the Australian Privacy Principles*

A complaint by a staff member or School family, 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.¹⁷

5.1 *Disclosing personal information to overseas recipients*

1. The School will not disclose personal information to an overseas recipient without the express written permission of the individual concerned.¹⁸

5.2 *Staff Training*

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

¹⁷ APP 1.4(e)

¹⁸ APP 1.4 (f)

5.3 Privacy Policy to be available

Staff can access the latest approved version of this policy at any time in the School's Google Drive.

The School also includes the latest approved version on its website. However, the School will provide a printed copy of the policy if requested by a person or organisation.¹⁹

6 Legislative Compliance

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

- Privacy Act 1988 [link](#)
- 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

Business Manager

X 1402

11 Contact Person

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

Principal

Tel. (02) 6294 2455 Ext 1401

¹⁹ APP 1.5 and 1.6.