
Privacy Policy

The purpose of this policy is to assist employees in the careful and reasonable handling of personal information to maintain privacy while effectively carrying out Christian Schools Tasmania's functions and activities.

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1. SCOPE

The purpose of this policy is to assist staff in the careful and reasonable handling of personal information to maintain privacy while effectively carrying out Christian Schools Tasmania's functions and activities.

2. EXCEPTION

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, as employee records are not covered by the provisions of the *Privacy Act 1988*.

3. RELATED DOCUMENTS

- Enrolment Policy

4. DEFINITION OF TERMS

Where referred to in this document:

Christian Schools Tasmania (CST) means the organisation operating and incorporating the following schools:

- Calvin Christian School;
- Channel Christian School;
- Emmanuel Christian School; and
- Northern Christian School.

The School means CST or one of its schools.

The Board means the Board of Directors of Christian Schools Tasmania.

Executive is a forum including the Executive Director, Principals and the Business Manager.

Executive Director is the person appointed to the position of Executive Director of the Association, or a person acting from time to time in that position.

Principal means the person charged with responsibility for the operation of an Association school or a person acting from time to time in that position.

Business Manager is the person appointed to the position of Business Manager of the Association, or a person acting from time to time in that position.

Personal information means information, or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Parent means the parent, guardian or person legally responsible for the enrolment of a child.

5. COLLECTING, STORING AND USING PERSONAL INFORMATION

5.1 What is personal information?

Privacy refers to the need to protect the personal information that the School collects, stores and uses relating to individual students, parents, applicants for enrolment, employees, job applicants, volunteers, contractors and other people. It includes personal information on students and parents held after the period of a student's enrolment at a CST school.

Personal information is information about an individual from which the individual can be identified (or could reasonably be identified). Personal information includes (but is not limited to):

- sensitive information such as racial or ethnic origins, political opinions or affiliations, religious or philosophical opinions or affiliations, sexual preferences or practices, criminal records, scholarship results, exam marks or teachers' notes; and
- health information such as physical or mental health or a disability.

Personal information includes opinions, and may be true or not. It may be recorded in some form or other, or not—that is, it could simply be held in someone's memory. If personal information is recorded, it may be in completed forms, correspondence, emails or other types of documents or records.

The School will not collect personal information unless it is reasonable necessary for one or more functions or activities of the School. Personal information may include educational and academic records, student behaviour and disciplinary records, addresses, dates of birth, phone numbers, health information, physical characteristics, sports information, and information about co-curricular activities.

5.2 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 outlined below, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

5.2.1 Students and Parents

The School primarily collects personal information on students and parents to enable it to provide schooling for the student, including satisfying both the needs of parents and the needs of the student through the period of the student's enrolment.

Purposes include:

- keeping Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- carrying out day-to-day administration;
- looking after students' educational, social and medical wellbeing;
- seeking donations and marketing for CST and its schools; and
- satisfying the School's legal obligations and allowing the School to discharge its duty of care.

In some cases, if the School doesn't receive the personal information it asks for, the School may not be able to enrol or continue the enrolment of the student.

5.2.2 Job applicants, employees and contractors

The School's primary purpose in collecting personal information of job applicants, employees and contractors is to assess and, if successful, to engage the applicant, employee or contractor. Purposes include:

- administering the individual's employment or contract;
- satisfying insurance requirements;
- seeking funds and marketing for CST and its schools; and
- satisfying the School's legal and duty of care obligations; for example, meeting child protection legislation or seeking a police or driving record check.

5.2.3 Volunteers

The School obtains personal information about volunteers who assist the School in its functions or conduct associated activities (such as parent help and school fairs) to enable the School and the volunteers to work together, and to satisfy the School's legal obligations and allow the School to discharge its duty of care.

5.2.4 Marketing and fundraising

Marketing and seeking donations for the future growth and development of CST and its schools ensures they continue to be quality learning environments in which both students and employees thrive. Personal information held by the School may be disclosed to an organisation that assists in the School's fundraising (e.g. School Councils or alumni organisations).

Parents, employees, contractors and other members of the wider school community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes. A person may opt out of receiving marketing and fundraising material at any time by contacting the CST office (Ph 03 6224 8300; Email admin@cst.tas.edu.au; or 299 Macquarie Street Hobart TAS 7000).

5.3 Collecting and using personal information

5.3.1 How we collect personal information

The School will usually collect personal information via forms filled out by parents, students or applicants, through face-to-face meetings and interviews, and via telephone calls and emails. On occasions people other than parents, students and applicants provide personal information. An example might be via a report provided by a medical professional or a reference from another school.

5.3.2 Consent

The School will only collect personal information where we have consent, except in cases where we consider collecting personal information is necessary to lessen or

prevent a serious threat to life, health or safety, and it is impractical to get consent or we have a legal obligation to do so.

5.3.3 Application to enrol a student

At each stage of the enrolment application process, the School will only request personal information necessary to complete that stage of the process, including assessing the suitability of any application against the selection criteria. We will advise parents how the information will be used.

At the commencement of any enrolment process, enquirers will be provided with a Standard Collection Notice (Attachment 1).

Where applicants are unsuccessful, we will only retain the applicant's information on file if consent is given by the parent; otherwise, the information will be destroyed.

Each time an Annual Information Update is administered, the School will provide information to parents about this Privacy Policy and how to access it.

5.3.4 Applications for employment, volunteering or contractor engagement

At each stage of the selection process, the School will only request personal information necessary to complete that stage of the process, including assessing the suitability of any application against the selection criteria. The School will advise applicants how the information will be used.

At the commencement of any selection process, or volunteer or contract engagement process, applicants will be provided with an appropriate Collection Notice (Employment Collection Notice [Attachment 2] or Contractor/Volunteer Collection Notice [Attachment 3]).

Where applicants are unsuccessful, we will only retain the applicant's information on file if consent is given by the individual; otherwise, the information will be destroyed.

Each time the School updates or renews information on employees, contractors or volunteers, they will provide information about this Privacy Policy and how to access it.

5.3.5 Using photos

The School will not use photos of students in newsletters, websites or other publications if permission has been denied.

5.3.6 Unsolicited personal information

If the School receives unsolicited personal information, they will destroy it unless they are permitted to hold the information and it is needed carry out functions or fulfil duty of care to students or staff. If the School retains the information, it will be stored in a similar way to all other personal information.

5.4 Storing personal information

The School will store personal information securely so that it can only be readily accessed by employees with a legitimate reason for using it, and is protected from interference, misuse, loss or unauthorised access.

Personal information about students, parents or employees that the School keeps in databases will be protected from general access by effective security arrangements such as passwords so that only those with a legitimate reason can gain access to the information relevant to them. Workstations and relevant software applications will log off or lock after a predetermined period of inactivity to prevent unauthorised access when they are unattended.

Personal information on paper will be kept in secure storage and be protected by any other security measures appropriate to maintaining the required level of confidentiality and privacy. Documents with personal information will not be left visible and unattended in work areas.

5.5 When personal information is no longer needed

When personal information is no longer needed for the purpose for which it was collected, the School will destroy it (or de-identify it).

6. PRIVACY OFFICER

The School will appoint a Privacy Officer, who will:

- Maintain a register of the School's forms that hold personal information (Appendix 1);
- Arrange for regular training of relevant employees in handling personal information so that privacy requirements are met;
- Audit school administrative practices at least annually to ensure all types and locations of personal information have been identified and the privacy requirements of this policy are being met, and recommend to the Executive Director modifications or improvements to information handling processes or staff training.

7. TRANSPARENCY & ACCESS

7.1 Making the Schools' Privacy Policy available

The School will provide a copy of this policy to all people requesting enrolment information and whenever we invite registrations for enrolment, application for employment or volunteering, or seek to appoint contractors. The School will make the policy readily available by posting it on the website of CST and its schools, and by request in hardcopy format.

7.2 Disclosure of personal information

7.2.1 Access to own personal information

The School will make available a student's personal information if requested by the student's parent, if it is reasonable to do so. Requests must be made in writing to the School Registrar by completing the *Application for Access to Information* form (Form PR-F02 – Attachment 4). If we decide not to provide access to the information, the School Registrar will give the reasons in writing.

7.2.2 Who else 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 CST and its schools, including specialist visiting teachers and sports coaches;
- Recipients of school publications, like newsletters and magazines;
- Parents of the child;
- Anyone you authorise the School to disclose information to; and
- Anyone to whom the School are required to disclose the information by law.

The School will not provide personal information to a third party unless they have consent from the Parent, or are legally required to do so. For example, the School

will not supply personal information on a student to a third party who is paying that student's school fees without the consent of the parents. Legal requirements to provide information may include child protection, law enforcement, court orders and public health or safety issues.

7.2.3 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.

8. CORRECTIONS & COMPLAINTS

8.1 Correcting information

The School will make reasonable efforts to keep personal information accurate, up-to-date and complete. Where advised by a parent that the personal information the School is holding is incorrect or incomplete, the records will be corrected.

8.2 Complaints

Where the School holds personal information on an individual and that person (or their parent) has a complaint relating to the privacy of the information, the complaint should be made in writing to the School's Business Manager. If an initial verbal complaint is made to the School, a request may be made to put the complaint in writing to the Business Manager so that the specific issues are clearly understood.

In some circumstances, someone making a complaint may wish to maintain anonymity (or pseudonymity). The School will respect this desire in handling the complaint.

The Business Manager will handle all complaints of breaches of this privacy policy, reporting regularly to the Executive Director on the progress and outcome of each complaint.

If the School does not respond to a complaint after 30 days, a complaint can be made to the Australian Information Commissioner at <http://www.oaic.gov.au/privacy/privacy-complaints>.

9. LEGISLATIVE REQUIREMENTS

Our privacy policy follows the Australian Privacy Principles found in the *Commonwealth Privacy Act 1988* (as amended).

10. ACCOUNTABILITIES

Role	Accountabilities
Executive Director	Provide resources so that systems and facilities for holding and using personal information maintain privacy. Monitor complaints about privacy to ensure satisfactory resolution.
Business Manager	Ensure processes are in place to provide for secure handling of personal information, both in hard copy and computer databases, so privacy of the information is maintained. Provide for information to be kept up-to-date, corrected where necessary, and destroyed once it is no longer needed. Receive and resolve any complaints about privacy.
School Registrar	Receive and respond to requests for access to personal information. Provide written reasons if access is to be refused.
Privacy Officer	Maintain the register of the School's forms that hold personal information. Arrange for training of relevant school staff in handling personal information. Audit the School's administrative practices at least annually to ensure the privacy requirements are being met Recommend to the Executive Director modifications or improvements to information handling processes or staff training.
Staff	Never access and use personal information unless it is required to do your work. Maintain the privacy of personal information, including information you know even though it isn't written down.

11. REFERENCES

Legislative and other external references

- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (includes Australian Privacy Principles in Schedule 1)

Policies

- CST Enrolment Policy

Forms

- PR-F01 Annual Information Update (sample form) (Appendix 2)
- Standard Collection Notice (Attachment 1)
- Employment Collection Notice (Attachment 2)
- Contractor/Volunteer Collection Notice (Attachment 3)
- Application for Access to Information (Attachment 4)

APPENDIX 1: REGISTER OF FORMS HOLDING PERSONAL INFORMATION

The forms listed below hold personal information. Any completed copies of these forms must be held in secure storage or, if the information is stored electronically, must be secured from unauthorised access.

Number	Title
	CST Enrolment Policy
EN-F01	Application to Register
EN-F02	Application to Enrol
EN-F03	Medical and Emergency Information
PR-F01	Annual Information Update
PR-F02	Application for Access to Information
WHS F3-7	Student Medication Request
	Staff Application Form
	Fee Assistance Application Form