

Purpose

The purpose of the Privacy Policy is to outline how the College collects and manages personal information of key personnel (i.e. staff, contractors, volunteers) and stakeholders (parents/carers and students) of the College. It also details how the College will carefully use this information to ensure this personal information is protected and only used for the means in which it was provided and/or intended.

Scope

The policy applies to all staff and students of the College, and provides information about areas of responsibility, reporting and communication. The policy applies to College Council members, employers, employees, volunteers, parents/carers and students, and people visiting the College site; and describes the type of information the College collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

Details

Faith Lutheran College Plainland is bound by the National Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the Privacy Policy of the College and describes how the College uses and manages personal information provided to or collected by it. This includes satisfying both the needs of parents/carers and the needs of an enrolled student throughout the whole period the student is enrolled at the College.

The College will regularly review and update this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices, and to make sure it remains appropriate to the changing College environment.

Collection and use of Personal Information

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

- Students and parents/carers before, during and after the course of an enrolment at the College;
- Job applicants, staff members, volunteers and contractors; and
- Other people who come into contact with the College.

Personal Information you provide

The College will generally collect personal information held about an individual by way of forms filled out by parents/carers or students, fact-to-face meetings and interviews, and telephone calls. On occasions people other than parents/carers and students provide personal information.

Personal Information provided by other people

In some circumstances the College 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.

Exclusion

Under the Privacy Act, the National 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 College and employee.

College Use of Personal Information

The College will use personal information it collects from parents/carers 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 they have consented.

Students and Parents/Carers

In relation to personal information of students and parents/carers, the College's primary purpose of collection is to enable the College to provide schooling for the student. This includes satisfying both the needs of parents/carers and the needs of the student throughout the whole period a student is enrolled at the College.

The purposes for which the College uses personal information of students and parents/carers include:

- To keep parents/carers informed about matters related to their student's schooling, through correspondence, newsletters and magazines
- Day-to-day administration
- Looking after a student's educational, social and medical wellbeing
- Seeking donations and marketing for the College
- To satisfy the College's legal obligations and allow the College to discharge its duty of care.

In some cases, where the College requests personal information about a student or parent/carer, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the student.

In the event of a breach of student or parent/carer personal information, the College is obliged to advise all parents/carers by email within 30 days of the breach, outlining the personal information involved in the breach, a description of the data breach, the College's contact details and recommendations for steps to be taken to minimise harm. The College will attempt to contact the individual/s whose personal information has been breached as soon as practicable, to ensure any data loss can be addressed as quickly as possible. In any instance where a breach has occurred, which meets the define criteria and threshold outlined within the guidelines set by the Privacy Commissioner, the College is obliged to notify the Office of the Australian Information Commissioner (OAIC) – addressed to the Privacy Commissioner.

Employment applicants, staff members and contractors

In relation to personal information of employment applicants, staff members and contractors, the College'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 College uses personal information of employment applicants, staff members and contractors include:

- In administering the individual's employment or contract, as the case may be
- To care for the staff member in a medical situation or emergency
- For insurance purposes
- Seeking funds and marketing for the College
- To satisfy the College's legal obligations, for example, in relation to Child Protection legislation. In situations regarding child protection, it is the Principal or their delegate (i.e. Deputy Principal) who may seek, provide and/or share this information based on the circumstances and if any legal obligation exists.

Volunteers

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable the College and the volunteers to work together.

Marketing and Fundraising

The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to be a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising, for example, the College's Foundation or alumni organisation.

Parents/carers, staff, contractors and other members of the wider College community may, from time to time, receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

Disclosure of College retained personal information

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

- Another school/college
- Government departments
- Medical practitioners
- People providing services to the College, including specialist visiting teachers and sports coaches
- Recipients of College publications, like newsletters and magazines
- Parents/carers; and

- Anyone a parent/carer or student has authorised the College to disclose information to.

Sending information overseas

The College 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 National Privacy Principles.

Treatment of sensitive information by the College

In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health 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 the owner of the information agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The College's staff are required to respect the confidentiality of student's and parent/carer's personal information and the privacy of individuals.

The College has in place steps to protect the personal information the College 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.

Updating personal information

The College 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 College by contacting the Administration of the College at any time.

The National Privacy Principles require the College not to store personal information longer than necessary.

Personal information held by the College must be available to the owner

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally have access to their personal information through their parents/carers, but older students may seek access themselves.

To make a request to access any information the College holds about a student, parents/carers may contact the College Principal or Enrolment Officer in writing.

The College may require parents/carers to verify the identity and specify what information they require. The College may charge a fee to cover the cost of verifying each application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance.

Non-accessible Information

Some information may not be made accessible. These exceptions include where:

- this would unreasonably impact on the privacy of others
- the request is frivolous or vexatious
- information relates to existing or anticipated legal proceedings
- access would reveal intentions of the College in relation to negotiations
- access may prejudice an investigation or prosecution of possible unlawful activity.

Access may be denied to information contained in:

- psychiatric reports
- psychometric tests
- confidential communication within the College or between the College and external sources
- Confidential notes
- Scholarship exam results, internal reports or marks, or teachers' notes.

Reasons must be given where access is denied.

Consent and rights of access to the personal information of Students

The College respects every parent/carer's right to make decisions concerning their child's education.

Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's parents/carers. The College will treat consent given by parents/carers as consent given on behalf of the student, and notice to parents/carers will act as notice given to the student.

Parents/carers may seek access to personal information held by the College about them or their student by contacting the College 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 College's duty of care to a student.

The College may, at its discretion, on the request of a student, grant that student access to information held by the College about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents/carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

Communication

Further information about the way the College manages the personal information it holds should be sought through a request to the College Principal.

Policy Release Details

Last Review Date of Policy:	February 2020
Approved by:	College Council
Responsibility:	Principal
Point of Contact:	Principal
Next Review Date:	February 2021 (every year)

Related Policies and Documents

Data Breach Plan (Education Perfect)
Data Breach Plan (Microsoft / SharePoint)
Data Breach Plan (TASS)
Data Breach Plan (Turnitin)
FLC Enrolment Policy
FLC CCTV Policy
FLC Scholarship Policy
Letters of appointment
Staff employment documents