# GREENACRE BAPTIST CHRISTIAN COMMUNITY SCHOOL



### **PRIVACY POLICY**

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This Privacy Policy sets out how Greenacre Baptist Chrisitan Community School (GBCCS) manages personal information provided to or collected by it.

GBCCS is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988. In relation to health records, GBCCS is also bound by the Health Privacy Principles which are contained in the Health Records and Information Privacy Act 2002 (NSW).

GBCCS may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to GBCCS's operations and practices and to make sure it remains appropriate to the changing school environment.

## WHAT KINDS OF PERSONAL INFORMATION DOES GBCCS COLLECT AND HOW DOES GBCCS COLLECT IT?

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

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at GBCCS, including:
  - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
  - o parents' education, occupation and language background;
  - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
  - o results of assignments, tests and examinations;
  - conduct and complaint records, or other behaviour notes, and school reports; o information about referrals to government welfare agencies;
  - counselling reports;
  - o health fund details and Medicare number;
  - any court orders;
  - volunteering information; and
  - photos and videos at School events.
- job applicants, staff members, volunteers and contractors, including:
  - o name, contact details (including next of kin), date of birth, and religion;
  - o information on job application;
  - professional development history;
  - salary and payment information, including superannuation details;
  - medical information (e.g. details of disability and/or allergies, and medical certificates);
  - complaint records and investigation reports;
  - leave details;
  - photos and videos at School events;
  - workplace surveillance information;

 work emails and private emails (when using work email address) and Internet browsing history; and other people who come into contact with GBCCS, including name and contact details and any other information necessary for the particular contact with GBCCS.

#### PERSONAL INFORMATION YOU PROVIDE:

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

#### PERSONAL INFORMATION PROVIDED BY OTHER PEOPLE:

In some circumstances, GBCCS 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

#### **EXCEPTION IN RELATION TO EMPLOYEE RECORDS:**

Under the Privacy Act and the Health Records Act, the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to GBCCS's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between GBCCS and employee.

## THE PURPOSES FOR WHICH AND HOW GBCCS USE THE PERSONAL INFORMATION YOU PROVIDE:

GBCCS 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 by you, or to which you have consented.

#### **STUDENTS AND PARENTS:**

In relation to personal information of students and Parents, GBCCS's primary purpose of collection is to enable GBCCS to provide schooling to students enrolled at GBCCS, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of GBCCS. This includes satisfying the needs of Parents, the needs of the student and the needs of GBCCS throughout the whole period the student is enrolled at GBCCS.

The purposes for which GBCCS uses personal information of students and Parents include

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of GBCCS;
- looking after students' educational, social and medical wellbeing;
- seeking donations and marketing for GBCCS; and
- to satisfy GBCCS's legal obligations and allow GBCCS to discharge its duty of care.

In some cases where GBCCS requests personal information about a student or Parent, if the information requested is not provided, GBCCS may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

#### **JOB APPLICANTS AND CONTRACTORS:**

In relation to personal information of job applicants and contractors, GBCCS's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be.

The purposes for which GBCCS uses personal information of job applicants and contractors include:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for GBCCS; and
- satisfying GBCCS's legal obligations, for example, in relation to child protection legislation.

#### **VOLUNTEERS:**

GBCCS also obtains personal information about volunteers who assist GBCCS in its functions or conduct associated activities which enables GBCCS and the volunteers to work together.

#### **MARKETING AND FUNDRAISING:**

GBCCS treats marketing and seeking donations for the future growth and development of GBCCS as an important part of ensuring that GBCCS continues to provide a quality learning environment in which both students and staff thrive. Personal information held by GBCCS may be disclosed to other organisations to assist GBCCS fundraising on occasions where an external fundraising organisation is used.

Parents, staff, 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.

## WHO MIGHT GBCCS DISCLOSE PERSONAL INFORMATION TO AND STORE YOUR INFORMATION WITH?

GBCCS may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools;
- government departments (including for policy and funding purposes);
- medical practitioners;

- people providing educational, support and health services to GBCCS, including specialist visiting teachers, coaches, volunteers, and counsellors;
- providers of specialist advisory services and assistance to GBCCS, including in the area of Human Resources, child protection and students with additional needs;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;
- people providing administrative and financial services to GBCCS;
- recipients of School publications, such as newsletters and magazines;
- students' parents or guardians; © NCEC & ISCA 2019
- anyone you authorise GBCCS to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law including child protection laws.

#### **SENDING AND STORING INFORMATION OVERSEAS:**

GBCCS may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, GBCCS 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.

GBCCS may use online or 'cloud' service providers to store personal information and to provide services to GBCCS that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides GoogleWorkspace which includes Gmail, and stores and processes limited personal information for this purpose. School personnel its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering Google Workspace and ensuring its proper use.

#### **HOW DOES GBCCS TREAT SENSITIVE INFORMATION?**

In referring to 'sensitive information', GBCCS means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric 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 you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

#### MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

GBCCS's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

GBCCS has in place steps to protect the personal information GBCCS holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

#### **ACCESS AND CORRECTION OF PERSONAL INFORMATION**

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information which GBCCS holds about them and to advise GBCCS of any perceived inaccuracy. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or to update any personal information GBCCS holds about you or your child, please contact the School Principal by telephone or in writing. GBCCS may require you to verify your identity and specify what information you require. GBCCS may charge 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, GBCCS will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for the refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons).

#### CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

GBCCS respects every Parent's right to make decisions concerning their child's education.

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

Parents may seek access to personal information held by GBCCS about them or their child by contacting the School Principal by telephone or in writing. However, there may be occasions when access is denied. Such occasions would include where the release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of GBCCS's duty of care to the student.

GBCCS may, at its discretion, on the request of a student grant that student access to information held by GBCCS about them, or allow a student 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 student and/or the student's personal circumstances warrant it.

#### **ENQUIRIES AND COMPLAINTS**

If you would like further information about the way GBCCS manages the personal information it holds, or wish to complain that you believe that GBCCS has breached the Australian Privacy Principles please contact the School Principal, Mark Shume by writing or telephone at <a href="mailto:principal@gbccs.nsw.edu.au">principal@gbccs.nsw.edu.au</a>, 029642 3512. GBCCS will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.