



CROSSWAYS
LUTHERAN SCHOOL

Privacy Policy

Your privacy is important

This statement outlines the policy of Crossways Lutheran School on how we use and manage personal information that we are provided or collect.

The School is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Amendment (Enhancing Privacy Protection) Act 2012 (as amended).

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

What kind of personal information does the School collect and how does the School collect it?

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

- a. students and parents and/or guardians before, during and after the course of a student's enrolment at the School;
- b. job applicants, staff members, volunteers and contractors; and
- c. other people who come into contact with the School.

Certain laws governing or relating to the operation of schools require that certain information is collected.

This can take the form of:

Personal Information you provide: The School 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 phone calls. On occasions people other than Parents and students are asked to provide personal information.

Personal Information provided by other people: In some circumstances the School 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/report from another school.

Exception in relation to employee records:

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

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

Students and Parents:

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

The purpose for which the School uses personal information of students and Parents includes:

- a. pre-enrolment matters
- b. to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- c. day to day administration;
- d. looking after students' educational, social and medical wellbeing;
- e. seeking donations and marketing for the School;
- f. drawing upon the expertise of particular members of the School community to assist with operations and functions
- g. promotion and marketing of the School
- h. to satisfy the School's legal obligations and allow the School to discharge its duty of care.

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

Job applicants, staff members and contractors:

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

- a. in administering the individual's employment or contract, as the case may be;
- b. for insurance purposes;
- c. seeking funds and marketing for the School;
- d. to satisfy the School's legal obligations, for example, in relation to child protection legislation.

Volunteers:

The School also obtains personal information about volunteers who assist the School in its functions or are actively involved in educational programs within the classrooms. Volunteers must have a Police check and will be DCSI screened.

Marketing and fundraising:

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

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, including print media (eg newsletters and magazines) and electronic media (such as the School's website) and public media (such as radio or television), which include personal information, may be used for marketing purposes.

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

- a. another school;
- b. LSA
- c. government departments;
- d. medical practitioners;
- e. people providing services to the School, including specialist visiting teachers and sports coaches;
- f. recipients of School publications, like newsletters and magazines;
- g. Parents; and
- h. anyone you authorise the School to disclose information to and
- i. anyone to whom we are required to disclose the information by law.

Sending information overseas:

The School may disclose information about an individual to overseas recipients eg when storing personal information with 'cloud' service providers situated outside of Australia. The School will not send personal information about an individual outside Australia without:

- a. obtaining the consent of the individual (in some cases this consent will be implied); or
- b. otherwise complying with the Australian Privacy Principles.

How does the School treat sensitive information?

In referring to 'sensitive information', the School 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 you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The School's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

The School has in place steps to protect the personal information the School 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 School 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 School by contacting the Principal's Secretary at any time.

The Australian Privacy Principles require the School not to store personal information longer than necessary.

You have the right to check what personal information the School holds about you

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

To make a request to access any information the School holds about you or your child, please contact the School Principal in writing.

The School may require you to verify your identity and specify what information you require. The School may charge a fee to cover the costs of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the School will advise the likely cost in advance. If we cannot provide you with access to that information, we shall provide you with written notice explaining the reason(s) for refusal.

Consent and right of access to the personal information of students

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

Generally, the School will refer any requests for consent and notices in relation to the personal information of a pupil to the student's Parents. The School 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 the School about them or their child by contacting the School Principal. There will be occasions however 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 School's duty of care to the student.

The School may, at its discretion, on the request of a student grant that student access to information held by the School 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 so warranted.

Enquiries

If you would like further information about the way the School manages the personal information it holds, or wish to make any inquiry related to the School's compliance with the Australian Privacy Principles, please contact the School Principal on (08) 8625 2783.

The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as practicable after it has been lodged.

Appendix 1:

Related Documents

- a. Standard Collection Notice
- b. Employee Collection Notice
- c. Contractor / Volunteer Collection Notice
- d. Website Collection Notice

Collection Notices

A. Standard Collection Notice

1. Crossways Lutheran School collects personal information, including sensitive information, about students and parents or guardians before and during the course of a student's enrolment at the School. The primary purpose of collecting this information is to enable the School to provide schooling and educational services for your child. Allied to this, information will also be used for enrolment and administrative purposes.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
3. Laws governing or relating to the operation of schools require that certain information is collected. These include relevant Public Health and Child Protection laws.
4. Health information about students is 'sensitive information' within the terms of the Australian Privacy Principles (APPs) under the *Privacy Act*. We may ask you to provide medical information and reports about your child from time to time.
5. The School, as required, either by law or as appropriate for proper discharge of our duties, will disclose personal and sensitive information to others for administrative and educational purposes. This includes disclosure to other schools, LSA, government departments, medical practitioners and people providing services to the School, including specialist visiting teachers, sports coaches and volunteers and counsellors.
6. Personal information collected from students is regularly disclosed to their parents or guardians. On occasions, information regarding academic and sporting achievements, student activities and similar news is published in School newsletters, magazines and on our website. Photographs of student activities such as sporting events, school camps and school excursions may be taken for publication in School newsletters and magazines and on our website. The School will obtain separate permissions from the student's parent or guardian prior to publication of photographs.
7. Parents or students may seek access to personal information collected about them by contacting the School. There will, however, be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the student, or where students have provided information in confidence.
8. The School Privacy Policy also sets out how you may register a complaint about a breach of privacy and how the School will deal with such a complaint.
9. The School also, from time to time, engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organizations that assist in the School's fundraising activities solely for that purpose. We shall not disclose your personal information to third parties for their own marketing purposes without your consent.

10. Your contact details may also be included in a Parent Directory, published each year. You will have the opportunity to advise us before the start of each year, whether you wish and consent to having your details included in this Directory.
11. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.

B. Employment Collection Notice:

- In applying for this position you will be providing Crossways Lutheran School with personal information. We can be contacted:

4 Smith Rd, Ceduna 5690
Email: adxways@bigpond.net.au
Phone: (08) 86252873

- If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
- The School's Privacy Policy contains details of how you may complain about a breach of the APPs or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
- Generally we will not disclose this information to a third party without your consent but we may disclose this kind of information (as appropriate) to government departments, Lutheran Schools Association (LSA), medical practitioners, Centacare and people providing services to the School, including specialist visiting teachers, coaches and volunteers.
- We are required to conduct a criminal record check under Child Protection laws. We may also collect personal information about you in accordance with these laws.
- If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.

C. Contractor / Volunteer Collection Notice

- In applying to provide services to the School, you will be providing Crossways Lutheran School with personal information. We can be contacted:

4 Smith Rd, Ceduna 5690
Email: adxways@bigpond.net.au Phone: (08) 86252873

- If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
- You agree that we may store this information for two years.
- The School's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the APPs.
- Generally we will not disclose this information to a third party without your consent but we may disclose this kind of information (as appropriate) to government departments, Lutheran Schools Association (LSA), medical practitioners, Centacare and people providing services to the School, including specialist visiting teachers, coaches and volunteers.
- The School is required to (conduct a criminal record check) under Child Protection law for volunteers. We may also collect personal information about you in accordance with these laws.
- If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.

D. Website Collection Notice

- This statement sets out Crossways Lutheran School's policy relating to the privacy of your personal information.
- Crossways Lutheran School collects personal information, including sensitive information, about students, school employees, school councillors and others who interact with the Organisations.
- The primary purpose of collecting this information is to enable Crossways Lutheran School to provide services to schools, students, or others. Some of the information collected is to satisfy the School's legal obligations. The School's Privacy Policy is available on our website.
- The school's website collects the information that is voluntarily supplied, by yourself or your delegate. Crossways Lutheran School's website has been constructed by Boylen. Boylen's privacy policy is available at <http://www.boylen.com.au/privacy>

The School's website collects the following information from users:

- A record of your visit and logs the following information for statistical purposes - the user's IP address, the date and time of the visit to the site, the pages accessed and documents downloaded, the previous site visited and the type of browser used. No attempt will be made to identify individual users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect our web server logs. This information may be analysed periodically to determine the site's usage statistics.
- Crossways Lutheran School retains the e-mail address of people who send E-mails through any online forms or via any email addresses published on the site, for the purpose of sending a response.

Crossways Lutheran School may, from time to time, disclose personal information to others for administrative, child protection, legal or educational purposes. Such disclosures will only be in relation to the primary purpose of collection, or for secondary purpose, related to the primary purpose, and which the individual would reasonably expect. If [School] does not receive the information referred to above, it may not be able to provide the relevant service to the school, student, school employee or others.

The School occasionally uses contractors to assist in its functions and discloses relevant personal information to these contractors to enable them to meet their obligations.

Our Privacy Policy sets out how a person may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, or where access may result in a breach of confidence.

Our Privacy Policy also sets out how you may register a complaint about a breach of privacy and how the School will deal with such a complaint.

Any questions in relation to the collection, use and disclosure and retention of personal information collected by the School may be directed to the Principal.