

## Privacy Policy

DOCUMENT CONTROL			
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### 1. Purpose

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

### 2. Scope

- 2.1. This Policy does not apply to the School's treatment of a workers employment record, where the treatment is directly related to a current or former employment relationship between the School and worker, as employment records are not covered by the provisions of the Privacy Act 1988.

### 3. Policy

#### 3.1. Definition of terms for the purpose of this Policy:

- **Loss** means accidental or inadvertent loss of personal information likely to result in unauthorised access or disclosure. For example, an employee leaves a copy of a document or a device on public transport. If data can be deleted remotely or is encrypted, it will not constitute an NDB.
- **Notifiable Data Breach (NDB)** is a data breach that is likely to result in serious harm to any of the individuals to whom the personal information relates. An NDB occurs when personal information held by an organisation is lost or subjected to unauthorised access or disclosure. In such circumstances, CST must notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as required under the Privacy Amendment (Notifiable Data Breaches) Act 2017
- **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.
- **Privacy Officer** means the person appointed by CST to manage all inquiries and complaints arising under this Policy.
- **Sensitive Information** means information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record, or health information, genetic information or biometric information.
- **Unauthorised Access** means personal information accessed by someone who is not permitted to have access. This could include an employee of the entity, a contractor or an external third party (such as hacking).
- **Unauthorised Disclosure** means where an entity releases/makes visible the information outside the entity in a way not permitted by the Privacy Act. For example, an employee accidentally publishes a confidential data file containing personal information on the Internet.

### 3.2. Collecting, storing and using personal information:

3.2.1. 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;
- 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 reasonably 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.

3.2.2. 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.

3.2.2.1. 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;
- 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.

3.2.2.2. The School's primary purpose in collecting personal information of job applicants, workers and contractors is to assess and, if successful, to engage the applicant, worker or contractor.

Purposes include:

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

3.2.2.3. 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.

3.2.2.4. Marketing and fundraising: Marketing and seeking donations for the future growth and development of CST and its schools ensure 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](mailto:admin@cst.tas.edu.au); or 299 Macquarie Street Hobart TAS 7000).

### 3.3. Collecting and using personal information:

3.3.1. 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.

3.3.2. 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.

3.3.3. 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 on how the information will be used.

At the commencement of any enrolment process, enquirers will be provided with a Standard Collection Notice (Refer to Appendix: Privacy Policy Attachment 1: Standard Collection Notice).

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 Policy and how to access it.

3.3.4. 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 on 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 Privacy Collection Notice (Refer to Appendix: 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 Policy and how to access it.

- 3.3.5. Using photos: The School will not use photos of students in newsletters, websites or other publications if permission has been denied.
- 3.3.6. 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 to carry out functions or fulfil a 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.

- 3.4. **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 for maintaining the required level of confidentiality and privacy. Documents with personal information will not be left visible and unattended in work areas.

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).

- 3.5. **Transparency & access:**

- 3.5.1. Making the Privacy Policy available: The School will make the Policy readily available to all people requesting enrolment information, applying for employment, volunteering, or when appointing contractors by posting it on the website of CST and its schools. The Policy will also be available if requested in printed format.
- 3.5.2. Disclosure of personal information:
  - 3.5.2.1. 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 by completing the Application for Access to Information form (Refer to Appendix: Privacy Collection Notice Attachment 4). If we decide not to provide access to the information, the School will give the reasons in writing.

3.5.2.2. Who else the School might 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/or businesses providing services to CST and its schools, including specialist visiting teachers and sports coaches
- parents of the child
- anyone you authorise the School to disclose information to
- any person or organisation to whom the School is 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.

3.5.2.3. 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);
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

### 3.6. **Corrections and complaints:**

3.6.1. 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.

3.6.2. 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 Privacy Officer. If an initial verbal complaint is made to the School, a request may be made to put the complaint in writing to the Privacy Officer 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 Privacy Officer will handle all complaints of breaches of this privacy policy, regularly reporting to the CEO on the progress and outcome of each complaint.

Enquiries and complaints can be made to:

**Privacy Officer**

Telephone: 6224 8300

Email: [privacyofficer@cst.tas.edu.au](mailto:privacyofficer@cst.tas.edu.au)

Postal Address: 299 Macquarie Street, Hobart 7000

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>.

### 3.7. Accountabilities:

Role	Accountabilities
CEO	Provide resources so that systems and facilities for holding and using personal information maintain privacy. Monitor complaints about privacy to ensure satisfactory resolution.
Principal	Maintain the register of the School's forms that hold personal information. Audit the School's administrative practices at least annually to ensure the privacy requirements are being met. Recommend to the Chief Executive Officer modifications or improvements to information handling processes or staff training.
Privacy Officer	Ensure processes are in place to provide for secure handling of personal information, both in hard copy and computer databases, so the 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. Arrange for the training of relevant school staff in handling personal information.
School	Receive and respond to requests for access to personal information. Provide written reasons if access is to be refused.
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.

#### 4. **References and Additional Related Documents**

- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (includes Australian Privacy Principles in Schedule 1)
- CST Enrolment Policy
- CST Collection of Student & Family Data Guidelines
- CST Privacy Data Breach Response Policy
- [Standard Collection Notice \(Attachment 1\)](#)
- [Employment Collection Notice \(Attachment 2\)](#)
- [Contractor/Volunteer Collection Notice \(Attachment 3\)](#)
- [Application for Access to Information \(Attachment 4\)](#)

## GENERAL DEFINITION OF TERMS:

Where referred to in this document:

**Christian Schools Tasmania (CST)** means an association of Christians who, through their Board of Directors, are legally responsible for Calvin Christian School, Channel Christian School, Emmanuel Christian School and Northern Christian School.

**The School** refers to the CST school to whom the Policy applies.

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

**Executive** is a forum including the Chief Executive Officer, Principals and the Business Manager.

**Chief Executive Officer (CEO)** is the person appointed to the position of Chief Executive Officer 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.

**Compliance Manager** is the person appointed to the position of Compliance Manager of the Association, 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.

**Manager** means a person appointed to a managerial position within CST.

**Staff** is any person either employed by CST either on a casual, part-time or permanent basis as well as volunteers, contractors and sub-contractors engaged in working at a CST School.

**Parent** is a person who is the legal guardian of a child enrolled at a CST school.

**Child** means any student enrolled at a CST school.