



# Adelaide Christian Schools

## PRIVACY POLICY

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**CEO Authorisation**



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## ADELAIDE CHRISTIAN SCHOOLS

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The role of Adelaide Christian Schools (ACS) is to oversee, govern and support a number of schools both in Australia and overseas. These schools are co-educational and have several structures from ELC-7 through to R-12 settings.

Australian schools under the governance of ACS and covered by the ACS Privacy Policy include Adelaide Christian Schools Early Learning Centres, Sunrise Christian School Whyalla, Sunrise Christian School, Sunrise Christian School Out of School Hours Care and Temple Christian College.

The terms College and School are used interchangeably in this Policy.  
The terms Principal and Director are used interchangeably in this Policy.

## POLICY STATEMENT

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Adelaide Christian Schools (ACS) will comply with the Australian Privacy Principles (APP) contained in the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

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

This policy outlines and hereby ensures we at Adelaide Christian Schools collect, securely store, use, access, correct and disclose information about people responsibly and wisely.

The school has adopted the AISSA Privacy Policy as its base document for its Privacy Policy. A Privacy Audit document is available for management of ACS.

## DEFINITIONS

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**Personal Information** means information or an opinion whether true or not true, about an individual and that identifies or reasonably identifies the individual, regardless of its source and whether the information is recorded in a material form or not.

**Sensitive Information** is a type of information that is given extra protection and must be treated with additional care. It can include information or opinion about an individual's racial or ethnic origin, political opinions, membership of a professional 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. It can include health information and biometric information.



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**Health Information** is a subset of sensitive information – any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided, currently or in the future, to an individual that is also personal information. Health information also includes personal information collected in the course of providing a health service.

**Records:** The Privacy Act regulates personal information contained in a 'record'. A 'record' includes a 'document' or an 'electronic or other device'. A 'document' is defined to include anything on which there is writing, anything from which sounds, images or writings can be reproduced, drawings or photographs.

## TYPES OF INFORMATION COLLECTED

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The types of Information the school collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- Pupils and parents and/or guardians ('Parents') before, during and after the course of a pupil's enrolment at the school.
- Job applicants, staff members, volunteers and contractors: and
- Other people who come into contact with ACS schools.

### 1. **Personal information you provide:**

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

### 2. **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 from another school.

### 3. **Exception in relation to employee records:**

Under the Privacy Act, the Australian 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 School and employee.

## INFORMATION USAGE

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### **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.



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## **1. Pupils and Parents:**

In relation to personal information of pupils and Parents, the School's primary purpose of collection is to enable the School to provide schooling for the pupil enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable pupils to take part in all the activities of the School.

This includes satisfying both the needs of Parents, and the needs of the pupil and the needs of the School throughout the whole period the pupil is enrolled at the School.

The purposes for which the School uses personal information of pupil and Parents include:

- To keep Parents informed about matters related to their child's schooling, through correspondence, newsletters, year books and magazines;
- Day-to-day administration of the School;
- Looking after pupil's education, social and medical wellbeing;
- Seeking donations and marketing for the School;
- To satisfy the School's legal obligations and allow the School to discharge its duty of care.

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

## **2. Job applicants and contractors:**

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

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

- In administering the individual's employment or contract, as in the case may be;
- For insurance purposes;
- Seeking donations and marketing for the School;
- Satisfying the School's legal obligations, for example, in relation to the child protection legislation.

## **3. Volunteers:**

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

## **4. Marketing and fundraising:**

Personal information held by the School may be used to make an appeal to them and disclosed to organisations that assist in the School's fundraising, for example, the Parents and Friends Committee.



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School publications, such as newsletters, magazines and yearbooks, which include personal information, may also be used for marketing purposes.

## INFORMATION DISCLOSURE

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### **Who might the School disclose personal information to?**

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

- the Association of Independent Schools of South Australia (AISSA);
- insurers;
- 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 the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
- providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection and students with additional needs;
- providers of learning and assessment tools;
- school-approved competitions, including but not limited to the CSIRO CREST awards.
- 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);
- people providing administrative and financial services to the School;
- recipients of School publications, such as newsletters, magazines and yearbooks;
- pupils' parents or guardians;
- anyone the individual authorises the School 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:**

#### **Online Cloud Services**

The School may disclose personal information about an individual to overseas recipients, for instance, 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 consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The School uses online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications.



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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 server which may be situated outside Australia.

An example of such a cloud service is Google Apps for Education (GAFE). School personnel and the AISSA and 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 GAFE and ensuring its proper use.

## TREATMENT OF SENSITIVE INFORMATION

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### **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 orientation or criminal record, that is also personal information; health information and biometric information about an individual.

This information will be used only for the purpose for which it was provided or a directly related secondary purpose, unless an individual or parent agrees otherwise or unless the disclosure is allowed by law.

## MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

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The School's staff are required to respect the confidentiality of pupils' 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, 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

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The School endeavours to ensure that the personal information it holds is accurate, complete and up to date.

Under the Commonwealth Privacy Act, an individual has the right to seek and obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy.



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Pupils will generally have access to their personal information through their Parents, but older pupils 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 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 cost 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 will provide you with written notice explaining the reasons for refusal.

## **CONSENT AND RIGHTS OF ACCESS OF PUPIL'S INFORMATION**

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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 pupil's Parents. The School will treat consent given by Parents as consent given on behalf of the pupil and notice to Parents will act as notice given to the pupil.

Parents may seek access to personal information held by the School about them or their child by contacting the School Principal in writing. However, there may 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 breach of the School's duty of care to the pupil.

## **STUDENT MENTORING AND CHAPLAINCY DISCLOSURE STATEMENT TO STUDENTS**

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

The School provides chaplaincy and student mentoring services for its students as part of its pastoral care program. These are provided through chaplains and student mentors employed by the School.

Students are encouraged to make use of these services if they need assistance.

There are however a number of things that students and their parents should know before using this service.



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1. Records will be made of student mentor and chaplaincy sessions and because the student mentor or chaplain is an employee, those records belong to the school, not the student mentor or chaplain.
2. The School is very conscious of the need for confidentiality between student mentor or chaplain and student. However, at times it may be necessary for the student mentor or chaplain to divulge the contents of discussions or records to the Principal if the Principal, student mentor or chaplain considers it necessary for the student's welfare to discharge the school's duty of care to the student.
3. It is also possible that the Principal may need to disclose aspects of discussions with student mentor or chaplain to others in order to assist the student.
4. Where a disclosure is made it would be limited to those who need to know, unless the students consents to some wider disclosure.

We emphasise that disclosures (if any) would be very limited. However, if a student is not prepared to use the student mentor or chaplaincy services on the basis set out above the student will need to obtain counselling or similar services from outside the school

## ENQUIRIES AND COMPLAINTS

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If you would like further information about the way the School manages the personal information it holds or wish to complain that you believe that the School has breached the Australian Privacy Principles, please contact the School Principal in writing. The School will investigate any complaint and will notify you of its decision as soon as practicable.





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**COLLECTION NOTICES**

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## COLLECTION OF INFORMATION FROM FAMILIES

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1. The School collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a pupil's enrolment at the School. The primary purpose of collecting this information is to enable the School to provide schooling to pupils enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable pupils to take part in all the activities of the School.
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 and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
4. Health information about pupils is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may ask you to provide medical reports about pupils from time to time.
5. The School may disclose personal and sensitive information for educational, administrative and support purposes. This may include:
  - the Association of Independent Schools of South Australia (AISSA);
  - insurers;
  - 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 the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
  - providers of learning and assessment tools; school-approved competitions, including but not limited to the CSIRO CREST awards.
  - 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);
  - people providing administrative and financial services to the School;
  - anyone you authorise the School to disclose information to; and
  - anyone to whom the School is required or authorised to disclose the information to by law, including child protection laws.
6. Personal information collected from pupils is regularly disclosed to their parents or guardians.
7. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities, such as the Parents and Friends Committee, solely for that purpose.
8. School publications, such as newsletters, magazines and yearbooks may be used for marketing purposes. We will not disclose your personal information to third parties for their own marketing purposes without your consent.



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9. On occasions information such as academic and sporting achievements, pupil activities and similar news is published in School newsletters, magazines and yearbooks, and uploaded to our intranet and website. This may include photographs and videos of pupil activities such as sporting events, school camps and school excursions. The School will obtain permissions [either annually or at enrolment] from the pupil's parent or guardian (and from the student if appropriate) to include such content (photographs or videos and or other identifying material) in our promotional material or otherwise make this material available to the public For more information, please refer to the ACS Photo and Video Policy, available on our website.
10. We may include pupils' and pupils' parents' contact details in a class list and School 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.
12. The School may use online or 'cloud' service providers to store personal information and to provide services to the School 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 reside on a cloud service provider's server which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
13. The ACS Privacy Policy, accessible on the School's website, sets out how parents or pupils may seek access to and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as 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 pupil, or where pupils have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
14. The ACS Privacy Policy also sets out how parents and pupils can make a complaint about a breach of the APPs and how the complaint will be handled.
15. The Privacy Policy also sets out how parents and pupils can make a complaint about a breach of the APPs and how the complaint will be handled.



# Adelaide Christian Schools

## EMPLOYMENT COLLECTION NOTICE

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1. In applying for this position, you will be providing the School with personal information.
2. If you provide us with personal information, for example, your name and address or information contained in your resume, we will collect the information to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available. Applications will not be kept longer than 6 weeks after an application process ends.
3. The ACS Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles or how you may seek access to, or correction of, your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent.
5. We are required to conduct, or obtain a copy of, a Working with Children Check to collect information regarding whether you are or have been the subject of an AVO (Apprehended Violence Order) or an Intervention Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. 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 reside on a cloud service provider's server which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide us with the personal information of others, i.e. referees, we encourage you to inform them that you are disclosing that information to the School and why.



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## CONTRACTOR/ VOLUNTEER COLLECTION NOTICE

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1. In applying for this position, you will be providing the School with personal Information.
2. 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.
3. You agree that we may store this information for up to 12 months.
4. The ACS Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
5. We will not disclose this information to a third party without your consent unless otherwise permitted to.
6. We are required to conduct, or obtain a copy of, a Working with Children Check to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect other personal information about you in accordance with these laws.
7. The School may use online or 'cloud' service providers to store personal information and to provide services to the School 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 reside on a cloud service provider's server which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
8. 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.



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## ALUMNI ASSOCIATION COLLECTION NOTICE

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1. ACS Schools may collect personal information about you from time to time as members of the ACS or School Alumni. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of ACS and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the ACS Alumni.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by ACS to assist in its fundraising activities. If you do not agree to this, please advise us in writing.
4. ACS Alumni may publish details about you in various ACS and School publications over time. If you do not agree to this, you must advise us in writing.
5. The ACS Privacy Policy, accessible on the School's website, contains details of how you may seek access to and correction of your personal information which the School has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. 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 reside on a cloud service provider's server which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.

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.