

## Bethany Christian School Privacy Policy



BETHANY  
CHRISTIAN SCHOOL  
Educating for Eternity

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Review Date	February 2023
Related legislation/applicable section of legislation	Education and Children's Service Act 2019 Children's and Young People (Safety) Act 2017 First Aid in the workplace Code of Practice 2019 Work Health and Safety Act 2012(SA) Work Health and Safety Regulations 2012 (SA) Section 22 of the Disability Discrimination Act 1992 Protective Practices 2019 Disability Discrimination Act 1992 Disability Standards for Education 2005 Education and Early Childhood Services (Registrations and Standards) Act 2011 Education and Early Childhood Services (Registrations and Standards) Regulations 2011 Disability Standards for Education 2005 Work Health and Safety Act 2012, Commonwealth Privacy Act Commonwealth <i>Privacy Amendment (Enhancing Privacy Protection) Act 2012 (as amended)</i> Australian Privacy Principles
Related policies, procedures, guidelines, standards, frameworks	Enrolment Policy 2020 Medical Data Management Policy and Procedures Non-Medical Data Management Policy and Procedures Assessment Policy First Aid Policy 2020 Collection Notice (Standard) 2016 Employment Collection Notice, Contractor / Volunteer Collection Notice
Policy officer (position)	Debbie Clifford
Policy officer (phone)	8283 0000
Policy sponsor (position)	Deputy Principal
Executive director responsible (position and office)	Wendy Matear, Principal
Applies to	Whole school
Key words	Privacy, information, assessment, medical, health, documents
Status	Active
Approved by	Wendy Matear
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Date	Version	Revision Description
28 <sup>th</sup> October 2016	1.0	Updated Format
10/2/17	1.1	Addition of Standard Collection Notice 2016
13/2/20	1.2	Revised terminology and updated

## **Statement**

This statement outlines Bethany Christian School (BCS) and Bethany Early Learning Centre's (ELC) policy on how it uses and manages personal information provided to or collected by it. Bethany Christian School and Bethany ELC 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 the School's operations and practices and to make sure it remains appropriate to the changing School environment

## **Aims:**

This policy aims to ensure compliance with all relevant legislation and best practice regarding privacy related to Bethany Christian School.

## **Implementation:**

Bethany Christian School and Bethany ELC collects and holds information that includes (but it is not limited to) personal information, including sensitive information, about:

- Students and Parents/Caregivers and/or guardians ('**Parents/Caregivers**') before, during and after the course of a student's enrolment at the School / ELC;
- Job applications, staff members, volunteers and contractors; and
- Other people who come into contact with Bethany Christian School and Bethany ELC.

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

In some circumstances Bethany Christian School and Bethany ELC may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a referee from another school.

Bethany Christian School and Bethany ELC will use personal information it collects from Parents/Caregivers 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/Caregivers:**

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

The particular information required is set out in the enrolment paperwork. Requests for updated information may be sent by the school at intervals.

The purposes for which the School and ELC uses personal information of students and Parents/Caregivers/Caregivers include:

- pre-enrolment matters;
- to keep Parents/Caregivers informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after students' educational, social and medical well-being;
- drawing upon the expertise of particular members of the School and ELC community to assist with operations and functions;
- seeking donations or financial support for the School / ELC;
- promotion and marketing of the School / ELC;
- to satisfy the School / ELC's legal obligations and allow the School and ELC to discharge its duty of care.

In some cases where Bethany Christian School and Bethany ELC requests personal information about a student or Parent, if the information requested is not obtained, the School and ELC 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 applications, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, Bethany Christian School and Bethany ELC 's 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 Bethany Christian School and Bethany ELC uses personal information of job applicants, staff members and contractors include:

- In administering the individual's employment or contract, as the case may be;
- For insurance purposes;
- Seeking funds and marketing for the School / ELC;
- To satisfy Bethany Christian School and Bethany ELC 's legal obligation, for example, in relation to child protection legislation.

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 and ELC's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and ELC and employee.

#### Volunteers:

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

#### Marketing and fundraising:

Bethany Christian School and Bethany ELC treats marketing and seeking donations for the future growth and development of the School and ELC as an important part of ensuring that the School and ELC continues to be quality-learning environment in which both students and staff thrive. Personal information held by the School and ELC may be disclosed to an organization that assists in the School's fundraising, for example, Bethany Christian School's Parents/Caregivers and Friends Committee.

Parents/Caregivers, staff, contractors and other members of the wider School and ELC community may vary from time to time receive fundraising information. School publications, like newsletters, magazines and the school website, as well as and/or the public media (such as radio or television) which include personal information, may be used for marketing purposes.

#### Disclosure of personal information:

Bethany Christian School and ELC may disclose personal information, including sensitive information, held about an individual to:

- Another School /ELC;
- Government Departments;
- Medical practitioners
- People providing services to the School, including specialist visiting teachers and sports coaches
- Recipients of School publications, like newsletters and magazines;
- Parents/Caregivers;
- Anyone you authorise the School and ELC to disclose information to; and
- Anyone to whom we are required to disclose the information to by law

#### Sending information overseas:

Bethany Christian School and ELC 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 and current privacy legislation.

#### How does the School and ELC treat Sensitive information?

In referring to 'sensitive information', Bethany Christian School and ELC 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 and ELC staff are required to respect the confidentiality of students' and Parents/Caregivers' personal information and the privacy of individuals.

Bethany Christian School and ELC will protect the personal information the School and ELC holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

#### Updating personal information

Bethany Christian School and Bethany ELC 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 and ELC by contacting the School Receptionist during office hours during the School week.

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

Parents/Caregivers have the right to access personal information the School and ELC holds about them under the Commonwealth Privacy Act (as amended), an individual has the right to obtain access to any personal information that the School and ELC holds about them and to advise the School and ELC 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/Caregivers, but older children may seek access themselves.

To make a request to access any information Bethany Christian School and ELC holds regarding students, Parents/Caregivers must contact the School Receptionist during office hours during the School week. Parents/Caregivers will then be asked to complete a 24hr Student File Request Form.

Bethany Christian School and ELC may require Parents/Caregivers to verify your identity and specify what information they require. The School and ELC may charge a fee to cover the cost of verifying an application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, Bethany Christian School and ELC 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 rights of access to the personal information of students

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

Generally, Bethany Christian School and Bethany ELC will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents/Caregivers. The School and ELC will treat consent given by Parents/Caregivers as consent given on behalf of the student, and notice to Parents/Caregivers will act as notice given to the student.

Parents/Caregivers may seek access to personal information held by the School and ELC about them or their child by contacting the School and ELC Principal, Mrs Wendy Matear. 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 School / ELC's duty of care to the student.

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

#### Enquiries and complaints

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 Principal who acts as the School's Privacy Officer.

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.

#### **Related Documents**

Standard Collection Notice

Employment Collection Notice

Contractor / Volunteer Collection Notice

#### **Bethany Christian School Standard Collection Notice**

1. Bethany Christian School collects personal information, including sensitive information, about students and Parents/Caregivers 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 College 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, 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/Caregivers 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 through the School Enrolment Form.
7. The School may store personal information in 'the cloud' which may mean that it resides on servers which are situated outside off Australia.
8. Parents/Caregivers 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.

9. 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.
10. 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.
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.