# **Privacy Policy**

#### Scope of Policy and Source of Obligation

In the course of St Martins Lutheran College's activities, we manage and protect personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the 13 Australian Privacy Principles (APPs).

# Scope of policy

This policy outlines the circumstances in which we obtain personal information, how we use and disclose that information and how we manage requests to access and/or change that information.

### In the course of providing services we may collect and hold:

<u>Personal Information</u> including names, addresses and other contact details; dates of birth; next of kin details; photographic images; attendance records and financial information.

<u>Sensitive Information</u> (particularly in relation to student and parent records) including government identifiers (such as TFN), religious beliefs, nationality, country of birth, professional memberships, family court orders and criminal records.

<u>Health Information</u> (particularly in relation to student and parent records) including medical records, disabilities, immunisation details and psychological reports.

As part of our recruitment processes for employees, cont 0 Edd(d)8.959 0 Td()Tj2s35.()Tj0t4.2()0d5()Tj-0.004 Tc Tj-0

<u>Personal Information</u> including names, addresses and other contact details, dates of birth, financdrmation, cdizenship, employment references, regulatory acceditation, media, direcdorships, property ownership and driver's licence.cET/rf.ormatioET/rf.

<u>Sensitive Information</u> including government identifiers (such as TFN), nationality, country of birth, professional memberships, family court orders and criminal records.

<u>Health Information</u> (particularly in relation to prospective staff) including medical records, disabilities, immunisation details and psychological reports.

Generally, we will seek consent from the individual in writing before we collect their sensitive information (including health information).

It is noted that employee records are not covered by the APPs where they relate to current or former employment relations between the school and the employee.

### Collection of personal information

The collection of personal information depends on the circumstances in which St Martins Lutheran College is collecting it. If it is reasonable and practical to do so, we collect personal information directly from the individual.

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#### **Solicited Information**

St Martins Lutheran College has, where possible, attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form or Family/Student Information Update and Consent Form). However, given the nature of our operations we also receive personal information by email, letters, notes, via our website, over the telephone, in face-to-face meetings, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring.

We may also collect personal information from other people (e.g. a third-party administrator, referees for prospective employees) or independent sources. However, we will only do so where it is not reasonable and practical to collect the personal information from the individual directly.

### **Unsolicited information**

We will only use or disclose sensitive or health information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

We may share personal information to related bodies corporate, but only if necessary for us to provide our services.

The College may disclose information about an individual to overseas recipients only when it is necessary, for example to facilitate a student exchange program. The College will not however send information about an individual outside of Australia without their consent.

# Storage and Security of Personal Information

St Martins Lutheran College stores Personal Information in a variety of formats including, but not limited to:

databases

hard copy files

personal devices, including laptop computers

third party storage providers such as cloud storage facilities

paper based files.

St Martins Lutheran College takes all reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

These steps include, but are not limited to:

Restricting access and user privilege of information by staff depending on their role and responsibilities.

Ensuring staff do not share personal passwords.

Ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access

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Personal information may be disclosed to government agencies, other parents, other schools, recipients of school publications, visiting teachers, counsellors and coaches, our service providers,

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