

PRIVACY



Introduction and purpose

Mountain District Christian School was founded by the Mountain District Parent Controlled Christian School Association Limited. The school is based on a number of core values that recognise the indispensable nature of the Bible for the task of education and the God-given responsibility of parents to raise (educate) their children. The school exists to uphold the vision and mission of the Association to provide Christ-centred education in a nurturing Christian environment for its families.

As such information is collected from families to enable the school to carry out the task of educating the children in our care. The purpose of this policy is to enable careful and reasonable handling of personal information to maintain privacy while effectively carrying out the school's functions and activities in compliance the requirements under the Privacy Act, the 13 Australian Privacy Principles and the Health Records Act (Vic)..

Scope

All personal information supplied to, stored and used by Mountain District Christian School (MDCS), whether of students, parents or guardians, applicants for enrolment, staff or other people.

Collecting, storing and using personal information

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 and guardians, applicants for enrolment, staff, job applicants, volunteers, contractors and other people. It includes personal information on students, parents and guardians held after the period of a student's enrolment at the 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.

What kinds of personal information will the school collect and hold?

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 behavior and disciplinary records, addresses, dates of birth, phone numbers, health information, physical characteristics, sports information, and information about co-curricular activities.

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

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 the school
- Satisfying the school's legal obligations and allowing the school to discharge its duty of care.

In some cases, if we don't receive the personal information we ask for, the school may not be able to enrol or continue the enrolment of the student.

Job applicants, staff members and contractors

The school's primary purpose in collecting personal information of job applicants, staff members and contractors is to assess and, if successful, to engage the applicant, staff member or contractor. Purposes include:

- Administering the individual's employment or contract
- Satisfying insurance requirements
- Seeking funds and marketing for the school
- Satisfying the school's legal obligations; for example, meeting child protection legislation.

The Office of the Australian Information Commissioner (OAIC) states:

The handling of your personal information by a private sector employer is exempt from the Privacy Act if it is directly related to:

- *your current or former employment relationship*
- *an employee record relating to you.*

This means that a private sector employer does not need to comply with the Australian Privacy Principles (APPs) in the Privacy Act when it handles current and past employee records for something that is directly related to the employment relationship. This also means that an employer does not have to grant you access to your employee records under the Privacy Act.

Volunteers

The school obtains personal information about volunteers who assist the school in its functions or conduct associated activities (such as the Hospitality Team) to enable the school and the volunteers to work together.

Marketing and fundraising

Marketing and seeking donations for the future growth and development of the school ensures 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—for example, the school's foundation or alumni organisation.

Parents, staff, 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 school by phone on 03 9756 7244, emailing at mdcs@mdcs.vic.edu.au or mailing to Office, 325 Macclesfield Road, Monbulk, 3753.

Collecting and using personal information

How we collect personal information

The school will usually collect personal information via forms filled out by parents or students, through face-to-face meetings and interviews, and via telephone calls. On occasion, people other than parents and students provide personal information; for example via a report provided by a medical professional or a reference from another school.

Consent

We 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.

Applications to enroll

At each stage of the enrolment application process, we 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 how the information will be used.

Where applicants are unsuccessful, we will only retain the applicant's information on file if consent is given by the parent or guardian; otherwise, the information will be destroyed.

Using photos

We will not use photos of students in newsletters, web sites or other publications if we have not been given permission.

Unsolicited personal information

If we receive unsolicited personal information, we will destroy it unless we are permitted to hold the information and it is needed to carry out our functions or fulfil our duty of care to students or staff. If we retain the information, it will be stored in a similar way to all other personal information.

Storing personal information

We will store personal information securely so that it can only be readily accessed by a staff member with a legitimate reason for using it, and it is protected from interference, misuse, loss or unauthorized access.

- Personal information about students, parents or staff that we keep 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 software applications such as email will log off after a predetermined period of inactivity to prevent unauthorized access when they are unattended.
- Personal information on paper will be kept in locked storage and be protected by any other security measures appropriate to maintaining the required level of confidentiality and privacy. Documents with personal information must 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, we will destroy it (or de-identify it).

Privacy Officer

The school will appoint a Privacy Officer, who will:

- Maintain a register of the school's forms that hold personal information (see the Appendix)
- Arrange for regular training of relevant school staff in handling personal information so that privacy requirements are met
- Audit school administrative practices at least annually to ensure all types and locations of personal information have been identified and the privacy requirements of this policy are being met, and recommend to the Principal modifications or improvements to information handling processes or staff training.

Transparency and access

Making our privacy policy available

We will provide a copy of this privacy policy to all people requesting enrolment information and whenever we invite registrations for enrolment. We will make the policy readily available by posting it on the school website.

Accessing personal information

We will make available a student's personal information if requested by the student's parent or guardian, if it is reasonable to do so. Requests must be made in writing to the Business Manager by completing the *Application for Access to Information* form. If we decide not to provide access to the information, the Business Manager will give the reasons in writing.

Who might the School 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 providing services to the school, including specialist visiting teachers and sports coaches
- Recipients of school publications, like newsletters and magazines
- Parents
- Anyone you authorise the School to disclose information to.

We will not provide personal information to a third party unless we have consent from the parent or guardian, or we are legally required to do so. For example, we will not supply personal information on a student to a third party who is paying that student's school fees without the consent of the parents or guardians. Legal requirements to provide information may include child protection, law enforcement, court orders and public health or safety issues.

The School does not send personal information about an individual outside Australia.

Corrections and complaints

Correcting information

We will make reasonable efforts to keep personal information accurate, up-to-date and complete. Where advised by a student, parent or guardian that the personal information we are holding is incorrect or incomplete, we will correct our records. When a record has been corrected, the individual will be advised that the correction has been made.

Complaints

Where the school holds personal information on an individual and that person (or their parent or guardian) has a complaint relating to the privacy of the information, the complaint should be made in writing to the Registrar or the Principal. If you make an initial verbal complaint, the school may request you to make the complaint in writing to the Business Manager or the Principal so that the specific issues are clearly understood.

In some circumstances, someone making a complaint may wish to maintain anonymity (or pseudonymity). We will respect this desire in handling the complaint.

The Business Manager will handle all complaints of breaches of this privacy policy, reporting regularly to the Principal on the progress and outcome of each complaint.

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>.

Disclosure of information to Overseas Recipients

Mountain District Christian School does not have any ongoing relationships or need to give information to overseas entities. As such it will not knowingly provide information to overseas recipients. In the event that this changes or we are required to provide information, for example for an overseas trip, the individuals affected will be notified in advance.

Legislative requirements

Our privacy policy follows the Australian Privacy Principles found in Schedule 1 of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)*.

Accountabilities

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

<i>Role</i>	<i>Accountabilities</i>
Staff	<p>Never access and use personal information unless it is required to do your work.</p> <p>Maintain the privacy of personal information, including information you know even though it isn't written down.</p>

Definitions

<i>Term</i>	<i>Definition</i>
Personal information	<p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> ● whether the information or opinion is true or not; and ● whether the information or opinion is recorded in a material form or not.

References

Legislative and other external references

- *Privacy Act 1988* (Cth)
- *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth) (includes *Australian Privacy Principles* in Schedule 1)

Policies

- Enrolment

Forms

- Application for Access to Information

Appendix: Register of forms holding personal information

The forms listed below hold personal information. Any completed copies of these forms must be held in locked storage or, if the information is stored electronically, must be secured from unauthorized access.

Application to Register
 Application to Enrol
 Medical and Emergency Information
 Annual Information Update
 Application for Access to Information
 Student Medication Request