



**Emmanuel  
Christian  
School**

# Privacy Policy

General Policy GEN 1-5

Access Level – Public

Updated November 2020

# General Policy GEN 1-5 Privacy Policy

Prepared by	PROLEGIS Lawyers
Date used	March 2017
Date approved by the Principal:	Feb 2018
Monitored by	Principal
Review by	Executive team
Date for review	As needed
Status	Final
Policy Pertains to:	Whole school
File Details:	Emmaus SharePoint/ Policies & Procedures/ General

### Version History

Version	Date	Notes
1.0	March 2017	Emmaus name and policy number added by W.Morris
1.1	April 2017	Updated by E.Hofsink
1.2	Feb 2018	Update by W.Morris to reflect Federal Privacy law changes as advised by Prolegis
1.3	July 2018	Update to new logo and template, W.Morris
1.4	Nov 2020	Update file path, review date, job titles by W.Morris



# Contents

Vision/Purpose	4	Management and security of personal information	7
Values	4	You have the right to check what personal information the School holds about you	8
Policy	5	Consent and rights of access to the personal information of pupils	8
Your privacy is important	5	Enquiries	8
What kind of personal information does the School collect and how does the School collect it?	5		
How will the School use the personal information you provide?	6		
Who might the School disclose personal information to?	7		
How does the School treat sensitive information?	7		



## Vision/Purpose

Emmaus exists to partner with parents, in providing a Christ-centred, Biblically-grounded and academically-rigorous education, which enables students to grow in wisdom and character, to the glory of God.

## Values

### 1. Caring for Others

At Emmaus, we value, care for and respect each other because we are all made in the image of God. We partner with parents to care for and develop the whole person- body, soul and spirit. We foster a sense of belonging, celebrate one another's achievements and choose to be grateful for our school and each other. We are a community that learns in a fun, creative, encouraging and generous environment.

### 2. Striving for Mastery

At Emmaus, we encourage students to strive for excellence in all aspects of life: in study, work, and in relationships with God and with people. We believe God equips every person with gifts and abilities. We seek to instil in our students a strong desire to apply their utmost to what they do, an attribute that will long outlive their school years. Students are encouraged to master and apply academic and life skills in order to make the most of their opportunities in later life. Our goal is to equip students with the necessary skills and understanding to make wise and Godly choices, and to live resilient, fulfilled, and productive lives.

### 3. Equipping for Service

At Emmaus, our motivation for service is the love that Christ has shown us: his life of servant leadership is the example we seek to follow. Staff at Emmaus model integrity, accountability and the value of excellence in our work. We strive to equip students with both the desire and the skills to make a difference in the lives of others. We aim to grow students who are rich in Godly wisdom and noble character, and find their security in the love of Christ.

Emmaus families sent a weekly Bulletin about what's happening at Emmaus in the coming week. Once a month, a more elaborate Newsletter is sent out to staff and parents. Staff will be requested to supply items for these publications at various times. Bulletins and Newsletters are emailed to parents and loaded onto the school's website.



# Policy

## Your privacy is important

This statement outlines the School's policy on how the School uses and manages personal information provided to and collected by it.

The School is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) and the School is also bound by the *Health Records and Information Privacy Act 2002* (NSW) (**Health Records Act**), or equivalent legislation in other States/Territories (e.g. Victorian Health Records Act 2001) in relation to health records held by the School.

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

## What kind of personal information does the School collect and how does the School collect it?

The type of information the School collects and holds includes (but is not limited to) personal information, including 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 the School.

### Personal Information you provide

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

### Personal Information provided by other people

In some circumstances, the School may be provided with personal information about an individual from a third party. This includes a report provided by a medical professional or a reference from another school.

### Exception in relation to employee records

Under the Privacy Act, employee records are exempt from the Australian Privacy Principles. 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.



## 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 providing schooling for pupils enrolled at the school, and for secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

### Pupils and Parents

The School's primary purpose of collecting personal information belonging to pupils and Parents is to enable the School to provide schooling for the pupil. This includes satisfying both the needs of Parents and the needs of the pupil throughout the whole period the pupil is enrolled at the School.

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

- day-to-day administration;
- looking after pupils' educational, social, and medical wellbeing;
- keeping Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- seeking donations and marketing for the School; and
- 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 obtained, the School may not be able to enrol or continue the enrolment of the pupil.

### Job applicants, staff members and contractors

The School's primary purpose for collection of belonging to job applicants, staff members and contractors is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The secondary purposes for which the School uses personal information belonging to 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;
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

### Volunteers

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

### Marketing and fundraising

The School treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to be a quality learning environment in which both pupils 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.



## 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 (e.g. newsletters and magazines);
- Parents;
- anyone you authorise the School to disclose information to; and
- anyone to whom we are required by law to disclose the information.

### **Sending information overseas**

The School may disclose personal information it holds to overseas recipients, such as when storing personal information with cloud-based providers that are located outside Australia, and to facilitate major international events such as an exchange program or international tour. 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); and
- otherwise complying with the Australian Privacy Principles.

## How does the School treat sensitive information?

'Sensitive information' 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 and biometric 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 as permitted or required by law.

## Management and security of personal information

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, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records, and password access rights to computerised records. In the event of an eligible data breach occurring at the School, the School will inform all persons affected in conjunction with any directions given by the Office of the Australian Information Commissioner.



## You have the right to check what personal information the School holds about you

Under both the Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information that the School holds about them and to advise the School of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. Pupils will generally have access to their personal information through their Parents, but pupils aged over 15 may seek access themselves.

To make a request to access any 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 the School 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 to the personal information of pupils

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 Assistant Principal Operations. 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's duty of care to the pupil.

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 so warranted.

## Enquiries

If you would like further information about the way the School manages the personal information it holds or if you wish to make a complaint that you believe the School has breached the Australian Privacy Principles, please contact the Assistant Principal Operations. The School will investigate any complaint and notify you of the decision in relation to your complaint as soon as practicable after the decision has been made.



