



**Emmaus
Christian
School**

Privacy Policy

General: GEN 1-5

Access Level – Public

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Privacy Policy

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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
1.5	October 2021	Reviewed by Rachel McClure, future review date added
1.6	September 2024	Minor Changes to clarify wording



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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.



Introduction

1.1 Purpose and scope

This policy applies to Emmaus Christian School to ensure the privacy of Staff, Students and Families is always maintained. Emmaus is committed to an approach which upholds the privacy of individuals and families in relation to the collection, handling and uses of information.

1.2 Christian Rationale

Emmaus Christian School recognises the responsibility to care for and protect-

Love always protects, always trusts, always hopes, always perseveres.

1 Corinthians 13:7

Emmaus honours the laws and processes of our government, at all levels, for the safety and well-being of our students. Emmaus seeks to protect the rights of all people who provide information to the school, in accordance with relevant legislation.

1.3 Legislative requirements

Emmaus notes the requirements of the Privacy Act 1988, specifically the Australian Privacy Principles outlined in the Act.

1.4 Related Policies

- FIN 1-0 Fee Policy
- ENR1.0 Enrolment Policy
- ENC1 Enrolment Contract



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** 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:

- students, and parents and/or guardians (**parents**) before, during and after the course of a student'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 (generally electronic) filled out by parents or students, face-to-face meetings and interviews, and telephone calls. On occasion, people other than parents and students 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 students 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.

Students and Parents

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

The secondary purposes for which the School uses personal information of students and parents include:

- day-to-day administration;
- looking after students' educational, social, and medical wellbeing;
- keeping parents informed about matters related to their child's schooling, through school communication channels;
- 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 student or parent, if the information requested is not obtained, 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 for collection of personal information 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;
- for insurance purposes;
- seeking funds and marketing for the School; and
- 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 students and staff thrive. Personal information held by the School may be disclosed to an organisation that assists in the School's fundraising.



Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications 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, sports coaches or information technology providers;
- recipients of School communications
- 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, wellbeing and biometric information about an individual.

Sensitive information will be used and disclosed only for the primary 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 students' and parents' personal information and the privacy of individuals.



The School has steps in place 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. Students will generally have access to their personal information through their parents, but students aged over 15 may seek access themselves.

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 students

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

Parents may seek access to personal information held by the School about them or their child by contacting the Deputy 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 student.

The School may, at its discretion, on the request of a student, grant that student access to information held by the School about them, or allow a student 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 student and/or the student'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 Deputy 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.

