Privacy Policy
Re-draft March 2014 – by Principal
Approved by Board – July 2015

► OVERVIEW

This Privacy Policy sets out how Green Point Christian College manages personal information provided to or collected by it.

Green Point Christian College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. In relation to health records Green Point Christian College is also bound by the NSW Health Privacy Principles contained in the Health Records and Information Privacy Act 2002 (Health Records Act).

Green Point Christian College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to its operations and practices and to make sure it remains appropriate to the changing school environment.

► DEFINITIONS

The Act is the Privacy Act 1988 as amended by the Privacy Amendment (Private Sector) Act 2000 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 which is a Commonwealth Act.

Australian Privacy Principles (APPs): the 13 APPs are the key components of the legislation and set minimum standards which relate to the collection, security, storage, use, access, correction and disclosure of personal information.

Types of Information Covered by the Act:

- “Personal Information”: Information or an opinion about an identified individual or an individual who is reasonably identifiable. It also includes sensitive and health information.
- “Sensitive Information”: A type of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information.
- “Health Information”: A subset of sensitive information. It is any information or opinion about the health or disability of an individual, or any expressed wishes or opinions about the individual’s health situation.

► WHAT KINDS OF PERSONAL INFORMATION DOES GREEN POINT CHRISTIAN COLLEGE COLLECT AND HOW IT IS COLLECTED?

The type of information Green Point Christian College collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- Pupils and parents and/or guardians before during and after the course of a pupil’s enrolment at the College;
- Job applicants, staff members, volunteers and contractors; and
• Other people who come into contact with the College.

**Personal information you provide:** Green Point Christian College 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, emails and telephone calls. On occasions people other than parents and pupils provide personal information.

**Personal information provided by other people:** In some circumstances Green Point Christian College may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.

**Exception in relation to employee records:** Under the Privacy Act and the Health Records and Information Privacy Act 2002 (NSW), the Australian Privacy Principles (and Health Privacy Principles) do not apply to an employee record. As a result, this Privacy Policy does not apply to the College’s treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee.

► **HOW WILL GREEN POINT CHRISTIAN COLLEGE USE THE PERSONAL INFORMATION YOU PROVIDE?**

Green Point Christian College 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.

**Pupils and Parents:** In relation to personal information of pupils and parents, Green Point Christian College’s primary purpose of collection is to enable the College to provide schooling for the pupil. This includes satisfying the needs of parents, the needs of the pupil and the needs of the College throughout the whole period the pupil is enrolled at Green Point Christian College.

The purposes for which Green Point Christian College uses personal information of pupils and parents include:

• To keep parents informed about matters related to their child’s schooling through correspondence, newsletters and magazines;
• Day-to-day administration;
• Looking after pupils’ educational, social, spiritual and medical wellbeing;
• Seeking donations and marketing for the school; and
• To satisfy Green Point Christian College’s legal obligations and allow the College to discharge its duty of care.

In some cases where Green Point Christian College requests personal information about a pupil or parent, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity.

**Job applicants, staff members and contractors:** In relation to personal information of job applicants, staff members and contractors, Green Point Christian College’s primary 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 Green Point Christian College 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 College; and  
• To satisfy the College’s legal obligations, for example, in relation to child protection legislation.

Volunteers: A school also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, to enable the College and the volunteers to work together.

Marketing: Green Point Christian College treats marketing for the future growth and development of the College as an important part of ensuring that the College continues to be a quality learning environment in which both pupils and staff thrive.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

Exception in relation to related school: The Privacy Act allows each school, being legally related to each of the other schools being members of Christian Schools Australia, to share personal (but not sensitive) information with other schools who are members of CSA. Other CSA schools may then only use this personal information for the purpose for which it was originally collected by the Christian school. This allows schools to transfer information between them, for example, when a pupil transfers from a Christian school to another school who is a member of CSA.

WHO MIGHT GREEN POINT CHRISTIAN COLLEGE DISCLOSE PERSONAL INFORMATION TO?

Green Point Christian College may disclose personal information, including sensitive information, held about an individual to:

• Another school;
• Government departments;
• Church
• Medical practitioners;
• People providing services to Green Point Christian College, including specialist visiting teachers, counsellors and sports coaches;
• Recipients of College publications, such as newsletters and magazines;
• Parents;
• Anyone you authorise Green Point Christian College to disclose information to; and
• Anyone to whom we are required to disclose the information by law.

Sending information overseas: Green Point Christian College may disclose personal information about an individual to overseas recipients, for instance when storing personal information with “cloud” service providers which are situated outside Australia or to facilitate a school exchange. However, Green Point Christian College 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 privacy legislation.
HOW DOES GREEN POINT CHRISTIAN COLLEGE TREAT SENSITIVE INFORMATION?

In referring to “sensitive information”, a school means: information relating to a person’s racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information 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 is allowed by law.

MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

Green Point Christian College and its staff are required to respect the confidentiality of pupils’ and parents’ personal information and the privacy of individuals.

Green Point Christian College has in place steps to protect the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

Under the Commonwealth Privacy Act (and Health Records Act), an individual has the right to obtain access to any personal information which Green Point Christian College holds about them and to advise the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Pupils will generally be able to access and update their personal information through their parents, but older pupils may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or update any personal information Green Point Christian College holds about you or your child, please contact the Principal in writing.

The College may require you to verify your identity and specify what information you require. The College 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 College will advise the likely cost in advance. If we 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

Green Point Christian College respects every parent’s right to make decisions concerning their child’s education.

Generally, Green Point Christian College will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil’s parents. Green Point Christian College 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.
As mentioned above, parents may seek access to personal information held by Green Point Christian College about them or their child by contacting the Principal. 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 College’s duty of care to the pupil.

The College may, at its discretion, on the request of a pupil, grant that pupil access to information held by the College 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.

► PROCEDURES RE POSSIBLE OR BREACH OF PRIVACY, INCLUDING TAX FILE NUMBERS

Where there is an accidental or inadvertent Breach of Privacy, the Principal will notify the Chairperson of the Board of Directors, our legal representatives. The Principal will then act in accordance with legal advice.

► ENQUIRIES AND COMPLAINTS

If you would like further information about the way Green Point Christian College manages the personal information it holds, or wish to complain that you believe that Green Point Christian College has breached the Australian Privacy Principles, please contact the Principal. Green Point Christian College will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.