

1. Rationale

This policy outlines how Good News Lutheran College uses and manages personal information as required by the Australian Privacy Principles (“APPs” Appendix 1) contained in the Privacy Act (1988) (Privacy Act) and in accordance with relevant Australian legislation.

This policy is available on our website www.goodnews.vic.edu.au

A person may also request that the College provide them with a copy of this Privacy Policy in a different form, using the contact details set out below. The College may, from time to time, review and update this Privacy Policy to take account of new laws, Ministerial Orders, technology, changes to College’s operations and practices and to make sure it remains appropriate to the changing College environment.

2. Scope

This policy applies to all parents and guardians of College students, students and staff.

3. Kinds of Information the College Collects and Holds

The type of information the College 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 College
- Job applicants, staff members, volunteers, contractors and international agents who assist us with our activities and functions
- Individuals who are involved with activities associated with the College
- Other people who come into contact with the College

Unless exemptions have been requested, images of students (without attributed family names), may be used in electronic school publications, published in the public domain. From time to time, names will be used in school publications. Every reasonable effort is made to meet parents’ requests for child’s name/image to not be published.

4. Personal Information Provided by other People

In some circumstances, the 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 or college.

5. How the College uses Personal Information you Provide

The College will use personal information, collected from you primarily, for the purpose it was collected. It may also be used for secondary purposes that are related to the primary purpose of collection and can be reasonably expected, or to which you have consented.

In approaching the issue of privacy, Good News Lutheran College considers that the underlying arrangement between the College and parents is contractual. Parents are engaging the College to provide schooling for their child on the terms agreed by both parties. The College's authority over the student derives from the enrolment contract with the parents and its duties at law.

6. Students and Parents

In relation to personal information of students and parents, the College's primary purpose of collection is to enable the College 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 College.

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

- Providing schooling and educational services to students
- Looking after students' educational, social, emotional and medical wellbeing
- Keeping parents informed about matters related to their child's schooling, through correspondence, including reports, newsletters and magazines
- College marketing
- Day-to-day administration
- Seeking donations for the College
- Satisfying the College's legal obligations and allow it to discharge its duty of care.

In some cases where the College reasonably requests personal or sensitive information about a student or parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or allow the student to participate in the related activity.

7. Job Applicants, Staff Members and Contractors

In relation to personal information of job applicants, staff members and contractors, the 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 the College uses personal information of job applicants, staff members and contractors could include:

- Administration of the individual's employment or contract, as the case may be
- Insurance purposes
- Seeking funds and marketing for the College
- Satisfying the College's legal obligations, for example, in relation to child protection legislation.

8. Volunteers

The College may use personal information about volunteers who assist the College in its functions, operations or associated activities.

9. Marketing and Fundraising

The College treats marketing and the seeking of donations as essential for the future growth and development of the College. Relevant personal information, held by the College, may be disclosed to an affiliated organisation that assists in the College's fundraising.

Parents, staff, contractors and other members of the wider College community may, from time-to-time, receive fundraising information. An individual may request not to receive such direct marketing communications from the College, by contacting us using the contact details below.

10. Who the College may disclose personal information to

Where appropriate, the College may disclose relevant personal information as required by law, including sensitive information, held about an individual to:

- Another school, or place of employment
- Government departments
- Organisations associated with the College e.g. LEVNT, ISV
- Medical practitioners
- People providing services to the College, including specialist visiting teachers and sports coaches
- People providing services on behalf of the College
- Recipients of College publications, like newsletters and magazines
- College's legal representatives and/or financial collection agency in the event of payment default or legal proceedings
- Anyone to whom you authorise the College to disclose information.

11. Sensitive information

In referring to 'sensitive information', the College 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, and health 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, if an exception applies.

The exceptions include where:

- The individual has consented to a secondary use or disclosure
- The individual would reasonably expect the APP entity to use or disclose their personal information for the secondary purpose, and that purpose is related to the primary purpose of collection, or, in the case of sensitive information, directly related to the primary purpose
- The secondary use or disclosure is required or authorised by or under an Australian law or a court/tribunal order
- A permitted general situation exists in relation to the secondary use or disclosure
- The APP entity is an organisation and a permitted health situation exists in relation to the secondary use or disclosure

- The APP entity reasonably believes that the secondary use or disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body, or
- The APP entity is an agency (other than an enforcement body) and discloses biometric information or biometric templates to an enforcement body, and the disclosure is conducted in accordance with guidelines made by the Information Commissioner for the purposes of APP 6.

12. Management and security of personal information

In accordance with Australian law, the College's staff is required to respect the confidentiality of students' and parents' personal information and their privacy.

The College has, in place, steps to reasonably protect the personal information which it 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.

The APPs require the College not to store personal information longer than necessary.

13. Storage of Information

The College may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside of the College property, and/or outside of Australia.

14. How to obtain access to your personal information

A person may obtain access to their personal information held by the College, by contacting the College at any time using the contact details below.

The College will require you to verify your identity and specify in writing 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. Depending on the nature and time of the request, it may take up to six weeks for the information to be made available. Any exceptions will be notified in writing.

15. Access by students

As required by law, the College may, in its absolute discretion, grant a student access to personal information (including sensitive information) held by the College 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.

16. Consent and rights of access to the personal information of students

Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The College 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.

17. How to seek variations and corrections to your personal information

The College endeavours to ensure that the personal information (including sensitive information) the College holds is accurate, complete and up to date.

An individual may request that the College update or correct such information held by the College using the contact details set out below. If required, the College will update or correct personal information as soon as reasonably practicable after receiving such a request.

18. Contact us

If you would like further information about the way the College manages the personal information it holds, please contact us during business hours using the following contact details:

The Business Manager
Good News Lutheran College
580 Tarneit Road
TARNEIT VIC 3029

Phone: (03) 8742 9000
Email: frontdesk@goodnews.vic.edu.au

19. Review

Approval date:	January 2024
Effective date:	January 2024
Next review date:	2027
Policy Owner:	Board
Approving authority:	Principal
Related documents	
Legislation:	Privacy Act 1988
Supersedes:	PN 10.05.03 2021

APPENDIX 1

Australian Privacy Principles

Australian Privacy Principles — a summary for APP entities

from 12 March 2014



Australian Government
Office of the
Australian Information Commissioner

APP 1 — Open and transparent management of personal information
Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

APP 2 — Anonymity and pseudonymity
Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

APP 3 — Collection of solicited personal information
Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

APP 4 — Dealing with unsolicited personal information
Outlines how APP entities must deal with unsolicited personal information.

APP 5 — Notification of the collection of personal information
Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

APP 6 — Use or disclosure of personal information
Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

APP 7 — Direct marketing
An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

APP 8 — Cross-border disclosure of personal information
Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

APP 9 — Adoption, use or disclosure of government related identifiers
Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

APP 10 — Quality of personal information
An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

APP 11 — Security of personal information
An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

APP 12 — Access to personal information
Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

APP 13 — Correction of personal information
Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.

**For private sector organisations,
Australian Government
and Norfolk Island agencies
covered by the Privacy Act 1988**

www.oaic.gov.au