

PRIVACY POLICY

INTRODUCTION

This Privacy Policy sets out how Horizon Christian School (the School) manages personal information collected about families/ carers and others.

The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act.

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

WHAT KINDS OF PERSONAL INFORMATION DOES THE SCHOOL COLLECT AND HOW DOES IT COLLECT IT?

The type of information the School collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- Students and parents and/or guardians and caregivers ('parents') before, during and after the course of a student's enrolment at the School;
- Job applicants, staff members, volunteers, contractors and specialist service providers; 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 students, face-to-face meetings and interviews, emails and telephone calls. On occasions, people other than Parents and students provide personal information.

PERSONAL INFORMATION PROVIDED BY OTHER PEOPLE

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

EXCEPTION IN RELATION TO EMPLOYEE RECORDS

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. 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 the 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 stated at the time of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

STUDENTS AND PARENTS

In relation to personal information of students and parents, the School's primary purpose of collection is to enable the School to provide schooling and care for the student. This includes

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satisfying the needs of parents, the needs of the student and the needs of the School through the whole period the student is enrolled at the School.

The purposes for which the School uses personal information about students and parents includes:

- To communicate with parents and keep them informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- Day to day administration of the school;
- Looking after students' educational, social and medical wellbeing;
- 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 information requested is not provided, the School may not be able to enrol or continue the enrolment of the student or permit the student 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, the School'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 School uses personal information of job applicants, staff members and contractors includes:

- In administering the individual's employment or contract, as the case may be;
- For insurance purposes;
- Seeking donations 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 to conduct associated activities, such as Old Scholars, extra-curricular activities, clubs or groups under the School's authority, to enable the School and its volunteers to work together.

MARKETING, COMMUNITY RELATIONS AND FUNDRAISING

The School treats marketing, community relations and events, and seeking donations for the future growth and development of the School, or for community and overseas service, as an important part of ensuring the School continues to provide a quality learning environment in which both students and staff thrive, and to meet the School's Vision and Mission. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising and community relations, for example, the School's fundraising or Old Scholars organisations.

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Parents, staff contractors and other members of the wider School community may, from time to time, receive fundraising information. School publications, like newsletters, annual reports and year books, which include personal information and photographs, may be used for marketing purposes.

WHO MIGHT THE SCHOOL DISCLOSE 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, counsellors and sports coaches;
- Recipients of School publications, such as newsletters, annual reports and year books;
- Parents;
- Anyone you authorise the School to disclose information to: and
- Anyone to whom we are required to disclose information to by law.

SENDING INFORMATION OVERSEAS

The School 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 or mission or cultural trip. 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); or
- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

HOW DOES THE SCHOOL TREAT SENSITIVE INFORMATION?

In referring to 'sensitive information', the School means: information that holds relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, criminal record, 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 the holder of the information agrees otherwise, or the use or disclosure of the sensitive information is allowed 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 in place steps to protect the personal information the School holds from misuse, interference and loss, unauthorised process, 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 Privacy Act, an individual has the right to obtain access to personal information which the School holds about them and to advise the School of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

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

To make a request to access or update any personal information the School holds about a parent or student, contact should be made with the Privacy Officer in writing. The School may require you to verify your identity and specify what information you require. The School may require time to verify your application and locate, retrieve, review and copy any material requested. If the information sought is extensive, the School will advise the likely time required in advance. If the School cannot provide you with access to that information, we will provide you with written notice explaining the reasons for the refusal.

CONSENT AND RIGHT OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

The School respects every parent's right to make decisions regarding 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 the consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

As mentioned above, parents may seek access to personal information held by the School about them or their child by contacting the Privacy Officer. 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 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 student and/or the student's personal circumstances so warranted.

ENQUIRIES AND COMPLAINTS

The school will respond to parents who request further information about the way the School manages the personal information it holds, or who wish to complain that the School has breached the Australian Privacy Principles, via the Privacy Officer. The School will investigate any complaint and will notify parents of the making of a decision in relation to complaints as soon as is practicable after it has been made.



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REFERENCES

Privacy Act 1988 (Cwlth)

Australian Privacy Principles

Privacy Compliance Manual, September 2013, Independent Schools Council of Australia and National Catholic Education Commission

Standard Collection Notice

S1.16 Information sharing policy

APPENDIX 1:

INFORMATION COLLECTION NOTICE:

1. The School collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the School. This may be in writing or in the course of discussions. The primary purpose of collecting this information is to enable the School to provide schooling for the student and to enable them to take part in activities of the School.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
3. Laws governing or relating to the operation of schools require that certain information is collected. These include, but are not limited to, education, public health and child protection laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We ask you to provide medical reports about students from time to time.
5. The School from time to time discloses personal and sensitive information to others for administrative and educational purposes, including to facilitate the transfer of students to another school. This includes to other schools, government departments, medical practitioners and people providing services to the School, including specialist visiting teachers, sports coaches, music instrumental tutors, counsellors and volunteers.
6. Personal information collected from students is regularly disclosed to their parents or guardians. On occasions, information such as academic and sporting achievements, student activities and other news is published in School newsletters, daily bulletins, and school year books, on our website and in our local newspapers. Our School newsletter is placed on our website weekly. Photographs of student activities such as sporting events, school camps and school excursions may be taken for publication in School newsletters, daily bulletins, and school year books and on our website. The School will obtain permissions from the student's parent or caregiver for each calendar year.
7. The School may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. The School's Privacy Policy sets out how parents or students may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others; where access may result in a breach of the School's duty of care to the student; or where students have provided information in confidence.
9. The School's Privacy Policy also sets out how you may complain about a breach of privacy and how the School will deal with such a complaint.
10. The School from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. We will not disclose your personal information to third parties for their own marketing purposes without your consent.

APPENDIX 2:

EMPLOYMENT COLLECTION NOTICE

1. In applying for this position you will be providing the School with personal information. The School can be contacted as follows:

Horizon Christian School
Po Box 367
BALAKLAVA SA 5461
PH: 08 88622100
Fax: 08 88621332
admin@horizon.sa.edu.au

2. If you provide us with personal information, for example, your name and address or information contained in your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy sets out how you may seek access to personal information collected about you and how you may complain about a breach of privacy and how the School will deal with such a complaint. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
4. The School may occasionally use outside experts or consultants to assist the School with recruitment and appointment. In these circumstances, our contractual agreements with these parties will require the same commitment to your privacy as the School gives you. We will not disclose this information to any other third party without your consent
5. The School would usually conduct employment screening checks, which may include:
 - character and professional references
 - criminal history checks
 - checks for Apprehend Violence Orders or similar records under child protection lawsWe may also collect personal information about you in accordance with these laws.
6. The School may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
7. If you provide the School with the personal information of others, we encourage you to inform them: That you are disclosing that information to the School, (your reason for doing this), so that they can access that information if they wish; and that the School does not usually disclose the information to third parties.

APPENDIX 3:

OLD SCHOLARS COLLECTION NOTICE

1. The School may collect personal information about you from time to time. This may be in writing or in the course of discussions. The primary purpose of collecting this information is to enable the School to inform you about activities of the School and to keep Old Scholars and the School community informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the Horizon Old Scholars Association.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you.
4. The School may publish details about you in our newsletters, daily bulletin, year book, annual report or on our School website. If you do not agree to this you must advise us in writing as soon as possible.
5. The School's Privacy Policy sets out how you may seek access to personal information collected about you and how you may complain about a breach of privacy and how the School will deal with such a complaint. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others; where access may result in a breach of the School's duty of care to the student; or where students have provided information in confidence.
6. The School may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
7. If you provide personal information to us about other people, we encourage you to inform them of the above matters.

APPENDIX 4:

CONTRACTOR AND VOLUNTEER COLLECTION NOTICE

1. In applying to provide services to the School, you will be providing the School with personal information. The School can be contacted as follows:

Horizon Christian School
Po Box 367
BALAKLAVA SA 5461
PH: 08 88622100
Fax: 08 88621332
admin@horizon.sa.edu.au

2. If you provide us with personal information, for example, your name and address or information contained in your resume or proposal, we will collect the information in order to assess your application/proposal. We may also make notes and prepare a confidential report in respect of your application/proposal.
3. You agree that we may store this information for 3 years after the duration of the agreement in the case of engagement, or for a period of 12 months in cases where the application/proposal is unsuccessful.
4. The School's Privacy Policy sets out how you may seek access to personal information collected about you and how you may complain about a breach of privacy and how the School will deal with such a complaint. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
5. The School will occasionally use outside experts or consultants to assist the School with recruitment and appointment. In these circumstances, our contractual agreements with these parties will require the same commitment to your privacy as the School gives you. We will not disclose this information to any other third party without your consent.
6. The School has a policy of conducting employment screening checks, which may include:
 - character and professional references
 - criminal history checks
 - checks for Apprehend Violence Orders or similar records under child protection lawsWe may also collect personal information about you in accordance with these laws.
7. The School may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. If you provide the School with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and the reasons, so that they can access that information if they wish, and that the School does not usually disclose the information to third parties.

APPENDIX 5:

PHOTOGRAPHING AND FILMING STUDENTS

At Horizon Christian School we recognise that photography and filming are useful learning, publicity and celebratory tools within the School and that they are utilised in many ways. This includes record keeping, displays, lessons and student work. Photographs, video and digital images of students are considered “personal information”.

Photographs are defined as the taking of a still shot picture with the use of a camera, phone or other device.

Filming is defined as when a person captures a moment with the use of a phone, camera, tablet or other device that records the movement of an event.

Purpose of this Appendix:

This Appendix ensures the safe and responsible use of photography/filming across the Horizon Christian School community. It is designed to protect the personal information of individuals. It also allows individuals to control how and for what purpose their personal information is used and has been written in accordance with relevant legislation.

- All parents will be advised of events when photographs/films are to be taken and how they will be stored and used. All photos taken for school purposes will be stored on the school server.
- An annual letter (Permissions Form) will be provided to all families giving general consent for their child's photographs to be used at a school level within the confines of the school environment; to be used in the school newsletter; in class for academic purposes and displays; or in the school magazine. Parents will have the option to withhold or withdraw consent in this letter.
- All school newsletters are published on our school website. The general consent form will allow parents to choose whether or not they agree to their child's photograph in a newsletter being published on the school website.
- Any time a child is having a photograph or filming conducted for the use of the school website, media, school brochures, or on the internet, individual and specific consent will be requested from parents. These are cases when the photographs will be viewed by a third party.
- Parents are able to photograph or film their own child at school events, but any photographs or filming containing other students are not to be uploaded to the internet or social media, as this is releasing personal information which is illegal. These sites include, Facebook, Instagram, YouTube, etc.
- Staff are not to use their own personal devices when taking photos of students. These include tablets, iPads, phones and cameras.
- Student teachers are not permitted to take photographs of students for personal use without written consent from parents.
- Whole School Photos will be taken once a year by the Advanced Life Photography Company during term 3. All students present on 'photo day' will have their photograph taken regardless of whether photos are purchased by families. School photographs remain the property of the school and will be stored on a secure server. Where students



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are not to have their photo published, they will not be photographed in school group settings.