



Policy Category: Risk & Compliance (Medium Risk)

Status: Board Approved



Privacy Policy (External)

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The School is committed to protecting the personal information and privacy of all individuals who interact with us, including students, families, staff, volunteers, and the wider community. This External Privacy Policy outlines how we manage personal information in accordance with relevant privacy legislation and regulatory obligations.

This Policy underpins the School's privacy-related practices, procedures, and decision-making processes. It reflects our broader organisational commitment to fostering a culture of respect, accountability, and integrity in the handling of personal data.

The Policy is made publicly available via our website and may also be communicated through other external channels, such as newsletters, the Annual Report, and in information provided to families, staff, Board Directors, and volunteers (including via welcome or induction packs and secure online portals).

This Privacy Policy has been formally approved by the School Board of Directors. It is reviewed every 3 years and immediately following any significant privacy breach or child safety concern, to ensure it remains up to date and compliant with current legal and regulatory standards.

1 Policy Objective

1.1 Scope

This Privacy Policy applies to the management of personal information collected by all campuses and operations of the School, including in physical and virtual environments, and through both solicited and unsolicited means.

It covers the collection, use, disclosure, access, amendment, and disposal of personal information held by the School across all areas of its operations, whether that information is collected directly or indirectly, and whether in physical or digital formats.

This Policy applies to all individuals connected with the School environment and activities, including (but not limited to): School employees, religious personnel (where applicable), Directors, Students, Parents and carers, Volunteers, Contractors, Third-party and educational service providers.

This Policy also extends to environments provided or facilitated by third-party providers on behalf of the School, where the School maintains control or oversight of personal information.

However, this Policy does not apply to personal information held solely by a third party where the School has no right or authority to access, manage, or direct the use of that information (e.g., independent systems of certain technology service providers).

In accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) do not apply to employee records where the information relates directly to a current or former employment relationship. As such, this Privacy Policy does not apply to the School's handling of employee records in these circumstances. Instead, such records are managed in accordance with other applicable legislation, including the Fair Work Act 2009 and, where relevant, the Health Records Act 2001 (Vic) for staff health information.

1.2 Purpose

This Privacy Policy outlines the School's approach to the collection, use, management, and disclosure of personal information obtained through the School's activities. It provides a clear framework to ensure the School complies with its obligations under the Privacy Act 1988 (Cth), including adherence to the Australian Privacy Principles (APPs).

Specifically, this Policy supports:

- The development and implementation of systems, practices, procedures, and guidelines to ensure privacy compliance across all School operations.
- Transparency regarding the types of personal information the School collects, how that information is used, and the processes in place to manage requests for access or correction.
- The training and ongoing awareness of staff, volunteers, and other stakeholders in relation to privacy obligations and the contents of this Policy.
- Compliance with all relevant privacy laws, regulations, and standards.

1.3 Statement of Commitment

The School is committed to protecting the privacy and personal information of all individuals associated with its operations. We recognise the importance of maintaining the confidentiality, integrity, and security of personal data and are dedicated to handling all information in a lawful, fair, and transparent manner.

Our commitment extends to fostering a culture of privacy awareness, implementing robust systems and practices, and ensuring ongoing compliance with applicable privacy laws, including the Privacy Act 1988 and the Australian Privacy Principles (APPs).

The Privacy Policy is available to all staff via the School's intranet.

For more information about the School's Privacy Policy practices, please contact the School Principal.

2 Policy Principles

2.1 Definitions

Personal Information – Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether recorded in a material form or not. This may include a person's name, address, date of birth, contact details, health information, and educational records.

Sensitive Information – A subset of personal information that is given a higher level of protection under the Privacy Act 1988. This includes information about an individual's racial or ethnic origin, political opinions, religious beliefs, sexual orientation, health or disability status, or criminal record.

Health Information – A type of sensitive information that relates to an individual's physical or mental health, medical history, or health services provided. This also includes information collected in connection with providing health or wellbeing services at the School.

Privacy Act – Refers to the Privacy Act 1988 (Cth), which governs how personal information is collected, used, stored, and disclosed by organisations, including schools.

Australian Privacy Principles (APPs) – A set of legally binding principles under the Privacy Act 1988 that outline how personal information must be handled.

Data Breach – An incident where personal information held by the School is lost, accessed, disclosed, or altered without authorisation, whether accidentally or maliciously.

Third Party – Any individual or organisation that is not part of the School but may be engaged to provide services on its behalf. This may include software providers, external consultants, or government agencies.

Information Asset – Any recorded information, regardless of format (physical or digital), that has value to the School. This includes student records, financial data, staff files, emails, databases, and more.

2.2 Principles

The School is committed to protecting personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). The following principles underpin our approach to privacy:

- **Lawful and Fair Collection:** Personal information is collected in a lawful, fair, and transparent manner, and only where it is reasonably necessary for educational, operational, or legal purposes.
- **Data Minimisation:** Only the personal information required to fulfil a specific function or obligation is collected and retained.
- **Use and Disclosure:** Personal information is used only for the purpose for which it was collected or for a related purpose permitted under the Privacy Act. Where appropriate, consent is obtained prior to any disclosure.
- **Data Quality:** Reasonable steps are taken to ensure that the personal information we collect, use, or disclose is accurate, up-to-date, and complete.
- **Security and Storage:** Personal information is protected through robust physical, technical, and administrative safeguards to prevent loss, misuse, or unauthorised access.
- **Openness and Transparency:** The School provides clear information about privacy practices and responds to enquiries or complaints promptly and fairly.
- **Access and Correction:** Individuals have the right to access their personal information and request corrections in line with applicable legislation.
- **Accountability:** The School ensures that privacy obligations are embedded into organisational processes and are monitored regularly for compliance.

2.3 What is Personal Information

In this Privacy Policy, personal information has the meaning given in the Privacy Act 1988 (Cth). It refers to information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether recorded in a material form or not.

Common examples of personal information include:

- An individual's name, address, phone number, email address, photograph, or date of birth.
- Signatures and other forms of identification.
- Internet Protocol (IP) addresses or other device identifiers.
- Voice print and facial recognition data (where they capture unique characteristics).

Some types of personal information are considered sensitive information and are subject to additional protections under the Privacy Act. Sensitive information may include:

- Racial or ethnic origin.
- Political opinions or associations.
- Religious or philosophical beliefs.

- Trade union membership or associations.
- Sexual orientation or practices.
- Criminal record.
- Health or genetic information.
- Certain biometric information (e.g. fingerprint, voice, or facial recognition data).

Other forms of personal information the School may collect include:

- Credit information (where relevant).
- Some components of employee records.
- Location information in specific contexts (e.g. GPS-enabled services).

The School only collects and uses personal information where it is necessary for educational, operational, legal, or administrative purposes and always in accordance with relevant privacy legislation.

2.4 Types of Personal Information Collected

The School collects and holds a range of personal and sensitive information necessary to deliver educational services and meet our legal obligations. This information is collected from individuals in their capacity as current or prospective students, parents or carers, job applicants, employees, contractors, volunteers, alumni, visitors, or others who engage with the School.

If it is reasonable and practical to do so, the School will collect personal information directly from the individual. Generally, the School will seek consent from the individual in writing before collecting their sensitive information.

It is noted that employee records are not covered by the APPs where they relate to current or former employment relations between the School and the employee. However, a current or former employee's health records are covered by the Victorian Health Privacy Principles.

2.3.1. Types of Personal Information Collected

The types of personal information the School may collect include, but are not limited to:

Students

Whether before, during or after the course of a student's enrolment at the School, including but not limited to:

- Name, address, contact details, date of birth, gender, language background, religion, and previous School history.
- Medical and welfare information (e.g. allergies, disabilities, assistance provided, medical reports, cognitive and other medical assessments and names of doctors, health fund details, Medicare number).
- Behavioural, academic, attendance, and counselling records.
- Referrals to welfare agencies or information related to court orders.
- Photos and videos from School activities, including CCTV footage.

Parents, Carers and Families

Parents and carers and students' families, whether before, during or after the course of a student's enrolment at the School, including but not limited to:

- Name, address, contact details, education, and occupation background.
- Medicare and health fund details.

- Financial and business information.
- Court orders or parenting arrangements.
- Volunteering and Working with Children Check details.
- Photos and videos from School events, including CCTV footage.

Staff, Board Directors, Volunteers, Contractors, and Job Applicants

including where relevant to the role, but not limited to:

- Name, contact details, date of birth, next of kin, religion, gender.
- Working with Children Check details
- Job applications, skills, qualifications (including teacher registration), and professional development history. Salary, superannuation, and tax information.
- Relevant medical information (e.g. disabilities, medical certificates).
- Complaint and investigation records.
- Staff records including leave, performance, and discipline.
- Photos, videos, and system usage (e.g. emails, files, and activity on School-issued devices).

Suppliers and Third Parties

Staff of the School's suppliers, including but not limited to:

- Name, contact details, and role of staff associated with service providers.

Other Individuals (e.g. Emergency Contacts, Visitors)

Other people who come into contact with the School, for example emergency contacts, including but not limited to:

- Name, contact details, and any relevant information necessary for their relationship with the School.

2.3.2. Solicited Information

The School has, where possible, attempted to standardise the collection of personal information by using specifically designed forms to ensure that only the information required for the School to provide its services is collected. However, the School may also receive personal information necessary to effectively deliver its services or meet its legislative obligations via email, letters, notes, social media, our website, over the telephone, in face-to-face meetings, through financial transactions, and surveillance activities such as the use of CCTV security cameras or email monitoring.

The School may also collect personal information from other sources (e.g. a third-party administrator, referees for prospective employees etc.). Personal information will only be collected from third parties where it is not reasonable and practical to collect the personal information from the individual directly.

2.3.3. Unsolicited Information

The School may be provided with personal information without having sought it through our normal means of collection. This is known as “unsolicited information” and can be collected by:

- Misdirected postal mail – Letters, documents.
- Misdirected electronic mail – Emails, electronic messages.
- Employment applications sent to us not in response to an advertised vacancy.
- Information entered into or stored in online systems and platforms.
- Information communicated through mail, email, telephone or verbal communication.

Unsolicited information obtained by the School will only be held, used or disclosed if it is considered information that could have been collected by normal means. If that unsolicited information could not

have been collected by normal means, it will be destroyed, permanently deleted or de-identified as appropriate.

2.3.4. Device and Website Information

When individuals use the School websites or digital platforms, we may collect Device Information, including:

- IP address, browser type and version, operating system, login information.
- Device type, unique identifiers (UDIDs), and location data.
- Usage behaviour, referral URLs, and time spent on pages.
- Cookies, tracking pixels, log files, web beacons, and tags.

Additionally, as you browse our websites and platforms, we collect information about the individual web pages or products that you view, what websites or search terms referred you across those platforms, and information about how you interact with our suite of products. We refer to this automatically collected information as “Device Information”.

We collect Device Information using the following technologies:

- “Cookies” - Data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- “Log files” - Track actions occurring on our websites and collect data including your IP. address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons”, “tags”, and “pixels” - Electronic files used to record information about how you browse our websites.

2.3.5. Collection of Sensitive Information

Sensitive information is collected only when:

- It is reasonably necessary for educational, support, or legal purposes.
- It is required to prevent or lessen a serious threat to life, health, or safety.
- It is permitted under health or privacy legislation or permitted health situation.

Sensitive information may include health, ethnicity, religious beliefs, criminal history, or biometric data. The School will generally seek written consent before collecting sensitive information unless permitted or required otherwise by law.

The School may share sensitive information with other entities in our organisational structure, but only, if necessary, to provide our products or services. Sensitive information may also be disclosed outside of the School where required or permitted under legislation.

2.3.6. Information from Third Parties

In some cases, personal information may be collected from third parties where it is not practical to collect it directly from the individual. This may include:

- The date and time of your visit to our websites.
- IP address.
- Documents and pages you access.
- The type of browser and browser settings.
- Your operating system.
- Address of a recurring site you are about to visit.
- Information you submit regarding payment particulars.

- Device identifier, including Unique Device Identifiers (UDID).
- Device details.
- Pages visited.
- Language selections.
- Cookies.
- Tracking pixels.
- Geographic area and location.

We use this information to:

- Improve our websites and services and their functions.
- Provide personalised content or alerts.
- Ensure proper website functionality.
- Comply with legal and security obligations.
- Analyse trends through anonymised data.
- Any other reason allowed at law.

Information from these sources will only be collected and used in accordance with this Policy and applicable laws.

2.5 How Personal Information is Collected

2.4.1. Personal Information Provided

The School will generally collect personal information through a number of ways, including but not limited to:

- Forms filled out by staff, students, parents, or carer (e.g. enrolment and employment forms).
- In-person and over the phone, including interviews.
- Interactions between School staff and students, for example in classroom and other learning environments.
- Electronic means including emails and telephone calls.
- Online systems and portals.
- Through College portals and other digital platforms.
- Consent forms.
- Written communication to the School.
- Financial transactions and payment systems.
- Photographs, videos, and recordings taken by or supplied to the School, including through any CCTV cameras located at the School.
- In some circumstances, through authorised information sharing arrangements with other services.

We may also collect information from:

- Government agencies (e.g. education or child safety departments).
- Medical practitioners.
- Third-party service providers (e.g. software platforms).
- References and referees for job applicants.
- Public sources or social media, where relevant.

2.4.2. Personal Information Provided by Other People

On occasion, people other than staff, students, parents, or carers, such as volunteers, job applicants and contractors, provide personal information to the School.

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 a reference from another School. The type of information provided to the School may include but is not limited to:

- Academic records and/or achievement levels.
- Any other information that may be relevant to assisting the School to meet the needs of the students, including any support and adjustments.

2.4.3. Device Information and Activity

When visiting any of the School's digital platforms, we may collect information about your device and activity. This includes your IP address, login information, browser type and version, time zone setting, operating system and platform, and the type of device.

2.6 How Personal Information is Stored and Secured

2.5.1. Storage and Security of Personal Information

The School stores personal information in a variety of locations including, but not limited to:

- Local servers.
- Remote servers.
- Hard copy files.
- Personal devices, including laptop computers.
- Third-party storage providers such as cloud storage facilities.

The School takes all reasonable steps to protect the personal information we hold from misuse, loss, interference, unauthorised access, modification, or disclosure.

These steps include, but are not limited to:

- Restricting access and user privilege of information by staff depending on their role and responsibilities.
- Educating staff and students on the protection of personal passwords.
- Ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege.
- Implementing security measures around the School buildings and grounds Ensuring our IT and cyber security systems, policies and procedures are implemented and current.
- Monitoring staff compliance with internal policies and procedures when handling personal information.
- Undertaking due diligence with respect to third-party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far as practicable that they are compliant with the APPs or a similar privacy regime.
- The destruction, deletion, or de-identification of personal information we hold is no longer needed or required to be retained by any other laws.

2.5.2. Management and Security of Personal Information

The School takes reasonable steps to protect the personal information it holds from misuse, interference, loss and unauthorised access, modification, or disclosure.

The School recommends that all individuals, including parents and carers and the School community, adopt secure practices to protect themselves. You should ensure that all your passwords are strong and regularly updated and that your log-in details are kept secure. You should not share your personal

information with anyone without first verifying their identity and organisation. If you believe any of your personal information has been compromised, please contact the School immediately.

2.7 How Personal Information is Used

The School will generally use personal information it collects for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection (or in the case of sensitive information, directly related to the primary purpose of collection) and reasonably expected by the relevant individual. The School will otherwise use personal information where it has received the consent of the individual, where it is required or authorised by law, or otherwise in accordance with the Privacy Act.

The School only uses personal information that is reasonably necessary to deliver our services (the primary purpose), for a related secondary purpose that would be reasonably expected by the individual, or for an activity or purpose to which an individual has consented.

The School's primary uses of personal information include, but are not limited to:

- Providing education, pastoral care, extra-curricular and health services.
- Satisfying our legal obligations including our duty of care and child safety and wellbeing obligations.
- Sharing School information with parents/guardians.
- Marketing, promotional, and fundraising activities.
- Supporting the activities of Schools associations.
- Supporting the activities of School Values.
- Supporting community-based causes and activities, charities, and other causes in connection with the school's functions or activities.
- Helping us to improve our day-to-day operations including training our staff.
- Systems development; developing new programs and services; undertaking planning, research, and statistical analysis.
- School administration including for insurance purposes.
- Employment of staff.
- Engagement of volunteers.

We will only use or disclose sensitive information for a secondary purpose if an individual would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose. We may share personal information with related bodies corporate, but only, if necessary, for us to provide our services.

2.5.1. Students, Parents and Carers

In relation to the personal information of students, parents and carers, the primary purposes for which the School collects personal information are generally to provide schooling to students enrolled at the School (including educational and support services for the student), exercise its duty of care and perform necessary associated administration activities which will enable students to take part in the activities of the School. This includes satisfying the needs of parents and carers, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School and in some cases, before or after the time of their enrolment.

In particular, the purposes for which the School collects and uses the personal information of students, parents and carers include but are not limited to:

- Educating students.

- Providing for, protecting, and accommodating a student's health and wellbeing including educational, social, emotional, and medical wellbeing.
- Keeping parents and carers informed about matters related to their child's education, through correspondence, newsletters and magazines and other forms of communication.
- Day-to-day administration of the School.
- Seeking donations and marketing for the School.
- Satisfying the School's legal obligations, including:
 - Meeting the School's duty of care to students, staff, and visitors to the School.
 - Making reasonable adjustments for students with disabilities in accordance with anti-discrimination law obligations.
 - Providing, as far as reasonably practicable, School workplaces that are safe and free from risks to health and safety for workers and other people.
- Satisfying the School's administrative and regulatory requirements, including to the Lutheran Education VIC, NSW, TAS and ACT Ltd (LEVNT), the Victorian Registration and Qualifications Authority, the Commission for Children and Young People and any other statutory oversight bodies.
- Satisfying the requirements that apply due to its governance structure to LEVNT and other related bodies corporate (including affiliated ministries and educational institutions).

In some cases where the School requests personal information about a student, parent or carer, if the 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 or provide a particular service.

2.5.2. Photographs and Images of Students

The School may use and disclose photographs, video, digital or other images ('images') of students for School educational and communication purposes and will seek annual consent for the use of these images which may be used in publications, newsletters or on digital platforms accessible by the School community. We may also use the images for marketing and/or fundraising purposes in publications, newsletters, or presentations to the public. With specific consent we may share images with Lutheran Education VIC, NSW, TAS and ACT Ltd (LEVNT) for use in publications or website.

Where students' images are prominently featured (including all public use) the School **will seek separate specific consent from** affected students' parents or carers prior to each publication of promotional material for the School or otherwise where we are making it available to the public such as on the Internet, including through Social Media or sharing with LEVNT for marketing purposes.

2.5.3. Employment Applicants and Contractors

In relation to the personal information of applicants for employment with the School and contractors, the School's primary purpose of collecting of information is to assess the suitability of and (if successful) engage the applicant, or contractor.

The purposes for which the School uses personal information of employment applicants and contractors include, but are not limited to:

- Administering the individual's (application for) employment or contract.
- Providing, as far as practicable, a safe workplace, including in relation to questions of fitness for duty, making adjustments for workers with disabilities, and discharging occupational health and safety and duty of care obligations to others.
- For insurance purposes.
- Seeking donations and marketing for the School.

- Satisfying the School's legal obligations, including in relation to its commitment to provide children with safe environments.

2.5.4. Volunteers

The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, this also includes our volunteer Board Directors.

The purposes for which the School uses the personal information of volunteers include but are not limited to:

- Enabling the School to manage the engagement process of volunteers.
- For insurance purposes.
- Satisfying the School's legal obligations, including in relation to its commitment to provide child safe environments.
- To assess their suitability and to manage their presence on School premises and learning environments.

2.5.5. Counsellors

The School contracts with external providers to provide counselling and/or psychology services for some students. The Principal may require the Counsellor and/or Psychologist to inform him or her or other staff of any issues the Principal or the Counsellor and/or Psychologist believe may be necessary for the School to know for the safety, wellbeing or development of the student who is counselled or other students at the School.

2.5.6. 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 provide a quality learning environment in which both students and staff thrive. Limited personal information held by the School for example, contact details and year of enrolment, may be disclosed to organisations that assist in the College's fundraising, for example, the School Foundation or Old School Association, or on occasion, external fundraising organisations.

School publications, like newsletters and magazines, which include personal information and sometimes people's images, may be used for marketing purposes. The School will seek specific consent for any public publishing of images of children.

LEVNT publications, like brochures and website, which include personal information and sometimes people's images, may be used for marketing purposes. Please refer to the LEVNT privacy policy for further details.

2.5.7. Other Permitted Uses

We may also use personal information for other purposes where required or authorised by law.

2.8 How Personal Information is Disclosed

The School may disclose personal information, including sensitive information, held about an individual for the purposes for which it was collected, as set out above. This may include but is not limited to disclosure to:

- School service providers which provide educational, support and health services to the School either at the School or off campus including personnel at LEVNT.

- People providing educational support, such as specialist visiting teachers and supervisors, placement teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools.
- Third party service providers that provide online applications, services or hosting to the School, and where required for the training of staff in these platforms or services. The School will take reasonable steps to ensure that online service providers do not disclose or use the personal information for any purpose other than for the benefit of the School in accordance with this policy, except where they may be legally permitted or required to disclose or use it for another purpose.
- Other third parties which the School uses to support or enhance the educational pastoral care services for its students or to facilitate communications with parents and carers.
- LEVNT and other related bodies corporate to satisfy the oversight requirements that apply to the School owing to its governance structure.
- School foundations to enhance financial support of the School and its students and their families.
- Other authorised agencies and organisations to enable the School to discharge its legal responsibilities, for example under the Australia Education Regulations 2013 (Regulation) and the Australia Education Act 2013 (Cth) relating to students with a disability, including Nationally Consistent Collection of Data (NCCD), quality assurance processes, participation in the Australian Early Development Census (AEDC) and government audits.
- Authorised organisations and persons who support the School by providing consultative services or undertaking assessments for the purpose of educational programming or providers of health services such as counsellors, psychologists, School health services, or dental vans. Specific consent is obtained (except where otherwise required or permitted by law) to collect and disclose sensitive information, such as health information, as part of a service request which may include release of relevant medical or allied health reports and educational planning and evaluation documents such as personalised learning/behaviour/medical management plans.
- Another School includes its teachers to facilitate the transfer of a student.
- Federal and state government departments or agencies.
- Health service providers including medical professionals.
- Insurance providers for claim and incident management.
- Legal service providers and courts in the context of litigation and other legal claims.
- Recipients of School publications, such as newsletters and magazines.
- Students' parents and carers and their emergency contacts.
- Assessment and educational authorities including the Victorian Curriculum and Assessment Authority (VCAA), the Australian Curriculum, Assessment and Reporting Authority (ACARA), and the Victorian Regulation and Qualifications Authority.
- Anyone to whom the parent or carer authorises the School to disclose information.
- Prescribed organisations to whom the Child and Family Violence Information Sharing Schemes allow the sharing of confidential information to promote the wellbeing or safety of children, or to assess or manage family violence risk.
- Anyone who the School is required or authorised to disclose the information to by law, including under child protection and information sharing laws.
- An organisation that assists in the School's fundraising.

The School may disclose personal information without consent or in a manner that an individual would reasonably expect if:

- We are required to do so by law.
- The disclosure will lessen or prevent a serious threat to the life, health, or safety of an individual or to public safety.
- Disclosure is reasonably necessary for a law enforcement-related activity.

- Another permitted general situation applies.
- Another permitted health situation exists.

2.7.1. Sending and Storing Information Overseas

The School may disclose personal information about an individual to overseas recipients for the purposes of facilitating a school exchange or a student overseas tour. However, the School will not send personal information about an individual outside Australia without:

- Obtaining the consent of the individual; or
- Otherwise complying with the Australian Privacy Principles or other privacy legislation.

The School may from time to time use the services of third-party online service providers which may be accessible by the parents. Some personal information, including sensitive information, may be collected, and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia. School personnel and the School's service providers may have the ability to access, monitor, use or disclose emails, communications, documents, and associated data for the purposes of administering the system and services ensuring their proper use.

The School makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed, and stored outside Australia, in connection with any third-party services and where practical will endeavour to ensure personal information controlled by the School is located in countries with substantially similar protections as the Australian Privacy Principles.

Finally, the School may disclose limited personal information, including sensitive information, to entities affiliated with LEVNT for the limited purpose of ensuring that Australian safeguarding requirements are met.

2.9 Quality of Personal Information

The School takes reasonable steps to ensure the personal information it collects, holds, uses and discloses is accurate, complete and current, including at the time of using or disclosing the information.

Where a parent, carer, alumni, employee or third party engaged by the School has changed personal information or otherwise believes the information held by the School may be inaccurate, updated information can be provided to the School through the relevant digital platform or other reasonable means of communications.

2.10 Personal Information of Students

The Privacy Act does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information. At the School we take a 'common-sense' approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students and we will treat consents provided by parents/carers as consents provided by a student.

In seeking to respect the rights of children under the Privacy Act and recognising that in certain circumstances (especially when dealing with older students and when dealing with sensitive information), it will be appropriate to seek and obtain consent directly from students. We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others or result in a breach of the School's duty of care to the student.

2.11 Access and Correction of Personal Information

Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information and health information respectively 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 and carers, but older students may seek access and correction themselves.

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

To make a request to access or to update any personal information the School holds about parents or carers or children, please contact the Principal or the School Student Services team by telephone or in writing. The School may require verification of identity and specification of what information is required. The School may charge a fee to cover the cost of locating, retrieving, reviewing, and providing any material requested. If the information sought is extensive, the School will advise you of the likely cost in advance. If the School cannot provide access to that information, we will provide written notice explaining the reasons for refusal.

School staff may contact the People and Culture team for corrections to personal information.

There may be circumstances where the reason for refusal is not provided, where it is unreasonable to provide a reason (for example where giving a reason may prejudice action by the School to respond to unlawful activity).

2.12 Responding to Data Breaches

The School maintains procedures for responding to data breaches, including initial containment, formal investigation the formation of a data breach response team. If we have reasonable grounds to believe that a data breach has occurred which is likely to result in serious harm to any individual, the School will:

- Enact procedures to contain and investigate the data breach.
- Attempt to notify the affected and or at-risk individuals directly or, if it is not possible to notify individuals directly, publish a statement on our website and through appropriate public channels, and
- Provide a statement to the Office of the Australian Information Commissioner (OAIC) including details of the breach.

2.13 Roles and Responsibilities

Role	Responsibility
Lutheran Education VIC, NSW & TAS	LEVNT are responsible for providing any applicable Lutheran Education minimum directions on policy content and principles, support in form of templates and tools to direct efficiency and guide consistent, best practice and compliance policy and procedure.
School Board	School Board are responsible for establishing School policy and templates, minimum (and mandatory) requirements, directives and guidance for School policy. The School Board is required to support the Principal in their role of implementing policy. This is to leverage their expertise on: • Culture and alignment • Community engagement and input • Communication and awareness • Resourcing and embedding
Principal	Principal is responsible for the implementation of School policy and the development and deployment of policies and procedures in accord with School policies. The Principal is responsible to the School Board for ensuring every member of the School community understands and follows all policy and procedures including approvals of policy and procedure and variations. Oversee data management practices, including recordkeeping, consent management, and information security at the School level.
Staff and Volunteers	Must comply with the School's Privacy Policy and related procedures in their day-to-day handling of personal and sensitive information. Are responsible for protecting the confidentiality of personal data accessed or collected as part of their role. Must report any actual or suspected privacy breaches immediately to the relevant School leader.
IT and Data Managers	Maintain secure systems for storing, processing, and accessing personal information. Implement and monitor cybersecurity measures in line with current best practice. Support the School in the secure use of digital learning tools, platforms, and records management systems.

2.14 Consent and Rights of Access to the Personal Information of Students

The School respects every parent and carer's right to make decisions concerning their child's personal information.

Generally, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's parent(s) or carer(s). The School will treat consent given by a parent or carer as consent given on behalf of the student and notice to parents or carers will act as notice given to the student.

Parents and carers may seek access to personal information held by the School about themselves or their child by contacting the School Principal or Student Services team by telephone or in writing. However, there may 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, where the School reasonably believes that giving access would pose a serious threat to the life, health, or safety of any individual, where it would breach the School's duty of care to the student, or where it would be contrary to a mature minor student's wishes.

2.15 Anonymity

The School needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate the delivery of schooling to its students and its educational and support services, manage its workforce and fulfil other obligations and processes.

However, in some limited circumstances some activities and interactions with the School may be done anonymously where practicable, which may include making an inquiry or complaint or providing feedback.

2.16 Education and Awareness

The School is committed to fostering a culture of privacy awareness through ongoing education, support, and communication. This includes:

- **Staff Induction and Training:** All staff and volunteers receive training on privacy obligations as part of induction and through regular professional development.
- **Student and Parent Communication:** Information about how personal data is collected, used, and stored is communicated clearly through enrolment materials, privacy notices, and School communications.
- **Policy Accessibility:** This Privacy Policy is made publicly available via the School website and through School offices upon request.
- **Incident Response Awareness:** Staff are made aware of how to recognise and respond to privacy breaches, and where to seek support or escalate concerns.

2.17 Reporting Privacy Concerns

Staff, volunteers, third party service providers, contractors, external education providers, students, parents, carers, and other community members who have concerns on privacy compliance or believe that a privacy breach may have occurred should immediately report this to the Principal.

The Principal's details are provided below:

- Telephone: 03 9312 1253
- In Writing: 81-83 Westmoreland Road Sunshine North, Vic, 3020
- Email: principal@scs.vic.edu.au

2.18 Complaints

The School takes all complaints seriously. If any individual wishes to complain that the School has interfered with their privacy because of an alleged breach of the Australian Privacy Principles, they should contact the Principal in writing at:

- Telephone: 03 9312 1253
- In Writing: 81-83 Westmoreland Road Sunshine North, Vic, 3020
- Email: principal@scs.vic.edu.au

The School will investigate the complaint in accordance with the School's Complaints and Grievances Policy.

If the individual is not satisfied with the School's decision, they may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are:

GPO Box 5288, Sydney, NSW 2001
Telephone: 1300 363 992

An online privacy complaint form is available from www.aic.gov.au

Certain incidents might be covered by the School's Whistleblower Policy which can be found on our School website.

The Principal is responsible for ensuring that material breaches of this Policy and underlying policies, guidelines, and procedures are escalated to the School's Board and LEVNT as soon as possible.

A breach of this Policy by a staff member or contractor may lead to disciplinary action including possible termination of employment or appointment and/or referral to the appropriate authorities.

Data Retention and Disposal

The School retains personal information only for as long as is necessary to fulfil the purposes for which it was collected, including to satisfy legal, operational, and educational obligations. When personal information is no longer required for these purposes and is not required to be retained under any Australian law, it is securely destroyed, deleted, or permanently de-identified. Records are retained in accordance with relevant legislation, including applicable education and archival recordkeeping obligations.

Privacy Impact Assessments (PIAs)

The School is committed to proactively managing privacy risks. Where the School implements new projects, systems, or processes that involve the handling of personal information, particularly through digital platforms or third-party tools, a Privacy Impact Assessment (PIA) may be conducted. A PIA assists in identifying, assessing, and mitigating potential privacy impacts before any new practice or technology is adopted. This is part of our commitment to upholding the Australian Privacy Principles and ensuring good privacy governance across our operations.

Use of Artificial Intelligence and Automated Decision-Making

At present, the School does not use artificial intelligence (AI) or automated decision-making systems to make decisions about students, families, or staff. If the School introduces such systems in the future, individuals will be informed of how their information is being used and provided with appropriate opportunities for explanation, review, or consent, where applicable. The School remains committed to ensuring that any future use of emerging technologies complies with privacy laws and ethical standards.

Access and Correction Requests

Individuals have the right to request access to personal information held about them by the School and to request corrections where that information is inaccurate, incomplete, or outdated. Requests to access or amend personal information can be made by contacting the Principal or the School's Privacy Officer using the contact details provided in this Policy. For security and verification purposes, individuals may be asked to provide identification and specify the information they wish to access or update. The School will respond to such requests within a reasonable timeframe and in accordance with its legal obligations.

3 Policy Compliance

3.1 Policy Breach

As policy documents provide direction and protection for the staff, parents and students of Sunshine Christian School it is an important requirement that those that are high and medium risk contain a statement on the implications of a breach.

All breaches, near misses and risks related to this policy should be reported to Principal: principal@scs.vic.edu.au

Compliance with this policy will be monitored by the Principal and Business Manager and this may include independent audits and reviews.

If you believe that the School has breached its obligations, please contact the Principal in writing or by telephone. The School will investigate your notification and will inform you of the outcome as soon as is practicable after a decision has been made.

The School Principal can be contacted on:

- Telephone: 03 9312 1253
- In Writing: 81-83 Westmoreland Road Sunshine North, Vic, 3020
- Email: principal@scs.vic.edu.au

Alternatively, the Business Manager can be contacted on:

- Telephone: 03 9312 1253
- In Writing: 81-83 Westmoreland Road Sunshine North, Vic, 3020
- Email: finance@scs.vic.edu.au

Certain incidents might be covered by the School Whistleblower Policy find the policy [here](#).

The Principal is responsible for ensuring that all breaches of this Policy and underlying policies, guidelines and procedures are escalated to the Principal as soon as possible.

A breach of this Policy may lead to disciplinary action including possible termination of employment or appointment and/or referral to the appropriate authorities.

4 Related Policies, Procedures and Legislation

4.1 Sunshine Christian School Policy and Procedure Linkage

- LEVNT Privacy Policy
- Child Safety and Wellbeing Policy
- Code of Conduct (Staff and Volunteers)
- ICT Acceptable Use Policy
- Records Management Policy
- Complaints Handling Policy
- Data Breach Response Plan
- Student Use of Digital Devices and Online Services Policy
- Enrolment Policy
- Social Media Policy
- Risk Management Framework
- Whistleblower Policy

4.2 Related Legislative Instruments (Victoria)

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- Health Records Act 2001 (Vic)
- Fair Work Act 2009 (Cth)
- Education and Training Reform Act 2006 (Vic)
- Education and Training Reform Regulations 2017 (Vic)
- Australian Education Act 2013 (Cth)
- Australian Education Regulation 2013 (Cth)
- Child Wellbeing and Safety Act 2005 (Vic)
- Children, Youth and Families Act 2005 (Vic)
- Family Violence Protection Act 2008 (Vic)
- Occupational Health and Safety Act 2004 (Vic)
- Disability Discrimination Act 1992 (Cth)
- Equal Opportunity Act 2010 (Vic)

4.3 Further Information

If you would like further information about the way the School manages its policy management framework, the first point of contact is with the Principal.

If you would like further information about the way the School manages its safety commitments, the first point of contact is to the Principal and/or the Business Manager.

Policy Control & Approval Information

Policy Category	Risk Rating	Approver	Date Approved	Next Review
Risk & Compliance (including Privacy)	Medium	Board	25/03/2026	03/2029