PRIVACY POLICY

Intended Use

This Statement is intended to be made available to students, parents, prospective parents, job applicants, staff, volunteers and others including past students, contractors, visitors and others that come into contact with the College.

The purpose of the Policy is to detail how we protect your privacy and how we comply with the requirements of the Privacy Act and the 13 Australian Privacy Principles and the Health Records and Information Privacy Act 2002.

Biblical Basis

1. The bible encourages us to be people of truth. Colossian 3:9 tells us not to lie to one another. Therefore if the college makes a promise to keep information private it is morally and spiritual obliged to do so.

2. Scripture strongly supports the principle that personal and confidential communications should be carefully guarded. Gossip is equated to the betraying of confidences, and is specifically forbidden (Prov. 11:13, 20:19; 25:9). The Golden Rule calls us to treat other’s confidences the same way we would like them to treat ours (Matt. 7:12). Even the primary passage on church discipline calls us to keep the circle of people involved in a problem as small as possible for as long as possible (Matt. 18:15-17). Respecting confidences is essential to creating an atmosphere of mutual trust in which people feel safe to confess their sins and ask for help (see Prov. 11:13; James 5:16).

3. At all times the college will obey the legal requirements as prescribed by the appropriate government authorities. Romans 13:1

Proverbs 11:13
Whoever goes about slandering reveals secrets, but he who is trustworthy in spirit keeps a thing covered.

Proverbs 25:9
Argue your case with your neighbor himself, and do not reveal another's secret.

Proverbs 17:9
Whoever covers an offence seeks love, but he who repeats a matter separates close friends.

Proverbs 20:19
A gossip betrays a confidence so avoid anyone who talks too much.
Privacy Policy

This Privacy Policy details how we protect your privacy and how we comply with the requirements of the Privacy Act and the 13 Australian Privacy Principles and the Health Records and Information Privacy Act. This policy also describes:

- who we collect information from;
- the types of personal information collected and held by us;
- how this information is collected and held;
- the purposes for which your personal information is collected, held, used and disclosed;
- how you can gain access to your personal information and seek its correction;
- how you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled; and
- whether we are likely to disclose your personal information to any overseas recipients.

Who do we collect personal information from?

At Glasshouse Country Christian College, we collect personal information from students, parents, prospective parents, job applicants, staff, volunteers and others including past students, contractors, visitors and others that come into contact with the College.

It is noted that employee records are not covered by the Australian Privacy Principles or the Health Privacy Principles where they relate to current or former employment relations between the College and the employee.

What kinds of personal information do we collect?

The kinds of personal information we collect is largely dependent upon whose information we are collecting and why we are collecting it, however in general terms the College may collect:

**Personal Information** including names, addresses and other contact details; dates of birth;

- next of kin details; financial information, photographic images and attendance records.

**Sensitive Information** (particularly in relation to student and parent records) including religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, professional memberships, family court orders and criminal records.

**Health Information** (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.
How do we collect your personal information?

How we collect personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

Where possible the College has attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form). However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face to face meetings, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring.

We may also collect personal information from other people (e.g. a personal reference) or independent sources (e.g. a telephone directory), however we will only do so where it is not reasonable and practical to collect the information from you directly.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information”. Where we collect unsolicited information we will only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate.

How we use personal information

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our 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 protection obligations; keeping parents informed as to Glasshouse Country Christian College community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;
- supporting the activities of College associations such as the Glasshouse Country Christian College Parents and Friends Association including distribution of a parent’s contact details on a class contact list;
- supporting community based causes and activities, charities and other causes in connection with the College’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;
- College administration including for insurance purposes;
- the employment of staff;
- the engagement of volunteers
We only collect sensitive information reasonably necessary for one or more of these functions or activities, if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety, or another permitted general situation (such as locating a missing person) or permitted health situation (such as the collection of health information to provide a health service) exists.

If we do not have the relevant consent and a permitted health situation or permitted general situation does not exist, then we may still collect sensitive information provided it relates solely to individuals who have regular contact with the College in connection with our activities. These individuals may include students, parents, volunteers, former students and other individuals with whom the College has regular contact in relation to our activities.

We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

**Storage and security of personal information**

We store personal information in a variety of formats including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on the College databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- Implementing physical security measures around the College buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.
Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

When we disclose personal information

We only use personal information for the purposes for which it was given to us, or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities. We may disclose your personal information to government agencies, other parents, other Colleges, recipients of College publications, visiting teachers, counsellors and coaches, our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation or permitted health situation exception applies;
- disclosure is reasonably necessary for a law enforcement related activity.

Personal information concerning 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 Glasshouse Country Christian College 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.

We are however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older students and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents 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 College’s duty of care to the student.

Author: Privacy Officer   Approved Date: July 2015   Review: July 2016
Disclosure of personal information to overseas recipients
We may disclose personal information about an individual to overseas recipients in certain circumstances, such as when we are organising an overseas excursion, facilitating a student exchange, or storing information with a “cloud computing service” which stores data outside of Australia. We will however take all reasonable steps not to disclose an individual’s personal information to overseas recipients unless:

- We have the individual’s consent (which may be implied); or
- We have satisfied ourselves that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- We form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- We are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

How we ensure the quality of your personal information
We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

How to gain access to your personal information that we hold
You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.

If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

Cookies
We use cookies to collect anonymous statistical information, including:

- your browser, computer platform and screen resolution
- your traffic patterns through our site, such as:
  - the date and time of your visit
  - the pages and documents accessed
  - the website you visited before ours
  - your server address.

We do not identify users or any browser activity outside of our website, except in the unlikely event of an investigation, where a law enforcement agency may have a warrant to inspect activity logs.

Transactional services available from our website may use cookies to track business processes. Please read the particular service’s privacy and security statement before beginning a transaction.
Complaints

Complaints need to be made in writing in accordance with the Glasshouse Country Christian College Grievance Policy.

Changes to our privacy and information handling practices

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website http://www.gccc.qld.edu.au/ regularly for any changes.