



Privacy Policy

Purpose:	Glasshouse Christian College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the College and describes how the College uses and manages personal information provided to or collected by it.		
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the College site and describes the type of information the College collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.		
References:	<ul style="list-style-type: none"> • Privacy Act 1988 (Commonwealth) • Privacy Amendment (Enhancing Privacy Protection) Act 2012 • Child Protection Policy • Disabilities Policy 		
Supersedes:	Version 1507 (July 2015)	This Version Number	2016 v 8 (October 2016)
Authorised by:	College Board		Date of Authorisation: 26 October 2016 (Board)
Review Date:	Annually, as appropriate, to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing environment.		Next Review Date: February 2018
Policy Owner:	College Principal with reference to the Glasshouse Christian College Board		

Biblical Basis

1. The Bible encourages people to be people of truth. Colossian 3:9 tells people 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 people to treat other's confidences the same way they would like them to treat theirs (Matt. 7:12). Even the primary passage on church discipline calls people 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.

Exception in Relation to Employee Records

Under the *Privacy Act*, the Australian Privacy Principles and the Health Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to the College's treatment of employee records, where the treatment is directly related to a current or former employment relationship between the College and employee.

Privacy Policy

This Privacy Policy sets out how the College manages personal information provided to or collected by it. The College is bound by the Australian Privacy Principles contained in the *Commonwealth Privacy Act* and the *Health Records and Information Privacy Act*. The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing College environment.

This policy also describes:

- who the College collects information from;
- the types of personal information collected and held;
- how this information is collected and held;
- the purposes for which personal information is collected, held, used and disclosed;
- how parents/students can gain access to their personal information and seek its correction;
- how parents/students may complain or inquire about the collection, handling, use or disclosure of the personal information and how that complaint or inquiry will be handled; and
- whether the College is likely to disclose the personal information to any overseas recipients.

What Kinds of Personal Information does the College Collect and how does the College collect it?

The type of information the College collects and holds includes (but is not limited to):

- personal information - including names, addresses and other contact details; dates of birth; next of kin details; financial information, photographic images and attendance 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.
- 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.

Who does the College Collect Personal Information from?

Glasshouse Christian College collects personal information from:

- students and parents and/or guardians ('parents') before, during and after the course of a student's enrolment at the College;
- job applicants, staff members, volunteers, visitors and contractors; and
- other people who come into contact with the College.

Personal Information Provided to the College

The College 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, letters, notes, telephone calls, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring. On occasions people other than parents and students provide personal information.

Personal Information Provided by Other People

In some circumstances the College may be provided with personal information about an individual from a third party, a reference from another school or a personal reference) or independent sources (e.g. a telephone directory), however it will only do so where it is not reasonable and practical to collect the information from parents directly.

Sometimes the College may be provided with personal information without having sought it through normal means of collection. This is referred to as "unsolicited information".

How will the College use the Personal Information Students and Parents Provide?

The College will use personal information it collects from parents/students for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by the parent/student, or to which consent has been given.

Personal Information Concerning Students and Parents

In relation to personal information of students and parents, the College's primary purpose of collection is to enable the College to provide schooling for the student. This includes satisfying the needs of parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

The purposes for which the College uses personal information of students and parents include but are not limited to:

- providing education, pastoral care, extra-curricular and health services;
- satisfying its legal obligations including its duty of care and child protection obligations; keeping parents informed as to Glasshouse Christian College community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;
- supporting the activities of College associations such as the Glasshouse 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 the College to improve its day to day operations including training of 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.

In some cases where the College requests personal information about a student or parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or 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 College's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the College uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be
- for insurance purposes
- seeking donations and marketing for the College
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

Volunteers

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable the College and the volunteers to work together.

Marketing and Fundraising

The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the College's Foundation or alumni organisation [or, on occasions, external fundraising organisations].

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

Who might the College Disclose Personal Information to?

The College may disclose personal information, including sensitive information, held about an individual to:

- another school or staff at another school
- government departments
- people providing educational, support and health services to the College, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority
- people providing administrative and financial services to the College;
- recipients of College publications, such as newsletters and magazines
- students' parents or guardians
- anyone whom parents authorise the College to disclose information to
- anyone to whom the College is required to disclose the information to by law.

Disclosure of Personal Information to Overseas Recipients

The College may disclose personal information about an individual to overseas recipients in certain circumstances, such as when it is organising an overseas excursion, facilitating a student exchange. The College will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- it has the individual's consent (which may be implied); or
- it is satisfied that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- it forms 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
- it is taking appropriate action in relation to suspected unlawful activity or serious misconduct.

The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access its services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. College personnel and the AIS and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.

Sensitive Information

In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.

If the College does not have the relevant consent and a permitted health situation or permitted general situation does not exist, then it may still collect sensitive information provided it relates solely to individuals who have regular contact with the College in connection with its activities 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.

These individuals may include students, parents, volunteers, former students and other individuals with whom the College has regular contact in relation to its activities.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the parent agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and Security of Personal Information

The College stores 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 College's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. The College has in place steps to protect the personal information the College holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

The security of personal information is of importance to the College and it takes all reasonable steps to protect the personal information it holds about parents/students 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 its 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 the College holds that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

The College website may contain links to other websites. It does not share personal information with those websites and it is not responsible for those privacy practices. Please check the website's privacy policies.

When Personal Information is disclosed

The College only uses personal information for the purposes for which it was given, or for purposes which are related (or directly related in the case of sensitive information) to one or more of its functions or activities. It may disclose parents'/students' personal information to government agencies, other parents, other schools, recipients of College publications, visiting teachers, counsellors and coaches, its service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- consent has been given;
- there would be reasonable expectation for the College to use or disclose the personal information in this way;
- the College 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.

Access and Correction of Personal Information

Under the *Commonwealth Privacy Act*, an individual has the right to obtain access to any personal information which the College holds about them and to advise the College 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 provide correction themselves.

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

The College takes all reasonable steps to ensure the personal information it holds, uses and discloses 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.

Personal information will be updated when it is advised by individuals or when the College becomes aware through other means. This will occur on an ongoing basis.

To make a request to access or update any personal information the College holds about a parent or a child, please contact the College Principal in writing. The College may require verification of identity and for the parent to specify what information is required. The College may charge a fee to cover the cost of verifying an application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance. If it cannot provide access to that information, it will provide written notice explaining the reasons for refusal.

Consent and Rights of Access to the 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.

The College respects every parent's right to make decisions concerning their child's education. Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The College will treat consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

However, the College is 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. It also acknowledges 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.

As mentioned above, parents may seek access to personal information held by the College about themselves or their child by contacting the College Principal. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the College's duty of care to the student.

The College may, at its discretion, on the request of a student grant that student access to information held by the College about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Cookies

The College uses cookies to collect anonymous statistical information, including:

- the users browser, computer platform and screen resolution
- the users traffic patterns through its site, such as:
 - the date and time of their visit
 - the pages and documents accessed
 - the website the user visited before the College's
 - the users' server address.

It does not identify users or any browser activity outside of its 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 the College website may use cookies to track business processes. Please read the particular service's privacy and security statement before beginning a transaction.

Enquiries and Complaints

If further information is required about the way Glasshouse Christian College manages the personal information it holds, or to lodge a complaint where it is believed that the College has breached the Australian Privacy Principles please contact the College Principal on 07 5439 0033. The College will investigate any complaint and will notify the complainant of the decision in relation to the complaint as soon as is practicable after it has been made.

Changes to Privacy and Information Handling Practices

This Privacy Policy is subject to change at any time. Please check the College's Privacy Policy on its website <http://www.glasshouse.qld.edu.au/> regularly for any changes.

APPENDIX I

Standard Collection Notice

1. The College collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to provide schooling to the students enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable them to take part in all the activities of the College.
2. Some of the information collected is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and 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*. The College may ask for medical reports about students to be provided from time to time.
5. The College may disclose personal and sensitive information for educational, administrative and support purposes. This may include to:
 - other schools and teachers at those schools
 - government departments
 - people providing educational, support and health services to the College, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools
 - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority
 - people providing administrative and financial services to the College
 - anyone parents/students authorise the College to disclose information to
 - anyone to whom the College is required or authorised to disclose the information to by law, including child protection laws.
6. Personal information collected from students is regularly disclosed to their parents or guardians.
7. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access its services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
8. The College's Privacy Policy, accessible on the College's website, sets out how parents or students may seek access to personal information collected about them. However, access may be refused in certain circumstances. 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 College's duty of care to the student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
9. The College Privacy Policy also sets out how complaints can be lodged about a breach of privacy and how the College will deal with such a complaint.
10. The College may engage in fundraising activities. Information received from parents/students may be used to make an appeal to them. [It may also be disclosed to organisations that assist in the College's fundraising activities solely for that purpose.] The College will not disclose personal information to third parties for their own marketing purposes without consent.
11. On occasions information such as academic and sporting achievements, student activities and similar news is published in College newsletters and magazines, on its intranet [and on its website]. This may include photographs and videos of student activities such as sporting events, College camps and College excursions. The College will obtain separate permissions from the students' parent or guardian (and from the student if appropriate) prior to publication or otherwise make this material available to the public such as on the internet. The College may include students' and students' parents' contact details in a class list and College directory.
12. If personal information of others is provided to the College, such as doctors or emergency contacts, the College encourages that the other party be informed that their information is being disclosed to the College and why.

APPENDIX 2

Alumni Association Collection Notice

1. The College's Alumni Association may collect personal information about parents/students from time to time. The primary purpose of collecting this information is to enable the College to inform parents/students about the College's activities and to keep alumni members informed about other members.
2. The College must have the information referred to above to enable it to continue membership of the Alumni Association.
3. From time to time the College engages in fundraising activities. The information received from parents/students may be used to make an appeal to them. It may also be used by the College to assist in its fundraising activities. If a parent/student does not agree to this, the College must be advised now.
4. The College's Alumni Association may publish details about parents/students in publications and on the College's website. If a parent/student does not agree to this, the College must be advised now.
5. The College's Privacy Policy, accessible on the College's website, contains details of how parents/students may seek access and provide correction of personal information which the College has collected and holds, and how complaints can be submitted about a breach of the APPs.
6. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access its services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
7. If personal information is provided to the College about other people, the College encourages that the other party be informed that their information is being disclosed to the College and why.

APPENDIX 3

Employment Collection Notice

1. In applying for a position employees will be providing Glasshouse Christian College with personal information. The College can be contacted on 07 5439 0033 or 58 Roberts Road, Beerwah, Qld, 4519.
2. If personal information is provided, for example, name and address or information contained on a resume, the College will collect the information in order to assess an application for employment. It may keep this information on file if an application is unsuccessful in case another position becomes available.
3. The College's Privacy Policy, accessible on the College's website, contains details of how a person may complain about a breach of the APPs and how they may seek access to and provide correction of personal information which the College has collected and holds. 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. Any refusal will be notified in writing with reasons if appropriate.
4. The College will not disclose this information to a third party without consent.
5. The College is required to collect information about employees under Child Protection laws.
6. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access its services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
7. If personal information is provided to the College about other people, the College encourages that the other party be informed that their information is being disclosed to the College and why.

APPENDIX 4

Contractor/Volunteer Collection Notice

1. In applying to provide services to the College, contractors/volunteers will be providing Glasshouse Christian College with personal information. The College can be contacted on 07 5439 0033 or 58 Roberts Road, Beerwah, Qld, 4519.
2. If personal information is provided, for example names and addresses or information contained on a resume, it will collect the information in order to assess the application. It may also make notes and prepare a confidential report in respect of the application.
3. The contractor/volunteer agrees that the College may store this information for 7 years.
4. The College's Privacy Policy, accessible on the College's website, sets out how personal information may be accessed and how complaints can be lodged about a breach of the APPs and how access and correction of personal information can be obtained which the College has collected and holds. 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. Any refusal will be notified in writing with reasons if appropriate.
8. The College will not disclose this information to a third party without consent.
9. The College is required to collect information under Child Protection law and may also collect personal information in accordance with these laws.
5. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access its services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
6. If personal information is provided to the College about other people, the College encourages that the other party be informed that their information is being disclosed to the College and why.