PRIVACY POLICY

This policy is written in relation to the Privacy Act (1988), and the Privacy Regulation (2013) including the 13 Australian Privacy Principles (APP)

We believe:
1. God created people as individuals to live in community for His honour and glory.
2. That as individuals who are wonderfully made by God, learning should be without fear of humiliation, embarrassment or pride.
3. Truth, integrity and caring for others are aspects of Christ-likeness.
4. Confidentiality and privacy of people’s personal information should be respected.
5. God requires us to obey the governing authorities as He has put them in their place of power.

and we recognise:
1. NCS is bound by the Commonwealth Privacy Act (1988) and the National Privacy Principles (2013).
2. Confidentiality is a valued attribute of individuals and the wider community.
3. The importance of protecting people’s privacy from misuse or unauthorised access.
4. That as NCS holds significant levels of personal information, we must use and manage wisely the information provided to it or collected by it.

therefore we will:
1. Ensure open and transparent policies regarding the management of personal information as clearly set out in the Privacy Policy and made available to all members of the school community through the school’s website. The school will annually conduct a Personal Information Management audit to ensure its processes and practices continue to meet its compliance obligations. The school will also advice, in writing any changes made to the Privacy Policy.
2. Ensure that where practicable individuals will have the right to anonymity when dealing with the school unless the school is required or authorised under Australian law to identify the individual, or where it is impractical to deal with individuals who have not identified themselves.
3. Only collect personal information that is reasonably necessary for, and directly related to, the function of the school. Where sensitive information is required, it will be collected with the informed consent of the individual. A privacy collection notice will be attached to all
forms used to collect and retain private information. All staff will be trained and reminded of
their obligation to disclose to members of the school community before private information
is collected, including the nature of the collection, its intended purpose and the nature of
information retention.

4. Ensure that unsolicited information received by the school is destroyed where that
information is not reasonably necessary for, and directly related to, the function of the
school.

5. Inform any individual (student, teacher, care-giver or member of the public) where
information is being collected, the purpose of collecting that information and the intended
nature of retention of that information.

6. Only disclose personal information for the intended purpose for which it was collected.
Where information is requested by third parties, consent of the individual will be obtained,
except in those circumstances where information is required by law, or for permitted health
situations, or where it would be reasonable to expect the individual to consent to the
disclosure of such information. Circumstances where it would be reasonable to communicate
private information would include but are not limited to:
   • Other schools to which a child or teacher has applied
   • Banking and superannuation funds
   • Government departments
   • Health and social work professionals
   • Parents and care-givers of the student concerned

7. Not disclose personal information for the purposes of direct marketing without the consent
of the individual. Where it is necessary to supply private details to a third-party, such as CEN,
staff will be offered an opt-out options from receiving any direct marketing.

8. Make all reasonable efforts to ensure that organisations that hold school information in
cross-border contexts (cloud-based service providers), supply information about privacy
practices, and that those practices are substantially similar to Australian legislation. The
school will therefore only engage the services of reputable companies who are able to supply
copies of their privacy policies. The school will retain copies of such policies.

9. Not use government-related identifiers as its own school-based student identification
numbers.

10. Ensure that all personal information that it collects is up-to-date, complete and relevant.
Families will be invited annually to check the accuracy of personal details and at such times
as the school becomes aware of changes such as through email bounce-back or returned
mail.
11. Protect all personal information from misuse, interference, loss or unauthorised access. All digital files will be protected by passwords and structured around levels of authority and permissions. Physical files are divided into two groups: those that contain normal information collected by schools and confidential information. Both will be stored in lockable cabinets. Only the principal will have the key to the latter cabinet. Only essential information on non-current staff and student, which may be required for administrative or legal purposes is archived.

12. Enable an individual, where a formal request is made, to view personal information that has been collected by the school, except where access to that information may compromise the privacy of another member of the community. While students may have access to view personal information, that would normally be done through a parental request. Reasonable efforts will be made to de-identify information pertaining to other individuals.

13. Ensure that where information is determined to be inaccurate, irrelevant, out-of-date, or misleading, the school will take all relevant steps to correct that information. Where that information has been communicated to third parties (as in point 6), the school will take all reasonable steps to notify the third party of any corrections.

**Grievances**

Where members of the community feel there has been a breach of the Privacy Policy, they should seek to have the matter addressed in accordance with the school’s Grievance Policy, ‘Complaints, Compliments and Suggestions’ as outlined in the Parent Handbook.