



Privacy Policy and Procedures

Purpose

This policy applies to all relevant personnel in the ACT German Language School Inc. (GLS).

All relevant personnel associated with the GLS are required by law to protect the personal and health information the GLS collects and holds.

The GLS manages information in a manner consistent with the *Information Privacy Act 2014 (ACT)*.

Definitions

Throughout this policy, the following terms are used

Learner refers to any person enrolled at the GLS

Children/child refers to any person under the age of 18 years

School refers to the ACT German Language School Inc.

Relevant personnel in the GLS refers to all employees, teachers, members of the GLS' Management Committee, administrators and relevant volunteers who work directly or in close proximity with learners or have access to a learner's records

Teacher refers to anyone involved in education and training environments

Volunteer refers to an individual who receives no remuneration for the work they do except out-of-pocket expenses; and the work fulfils a charity or community service good

Parent refers to an adult in a relationship with a child, including step parent, an adoptive parent, a foster parent, guardian, or a person who has custody or daily care and control of the child

Personal information refers to information or opinion that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can be reasonably be determined from the information or opinion. For example this includes all paper and electronic records, photographs and video recordings

Health information refers to information or opinion about a person's physical, mental or psychological health, or disability, which is also classified as personal information. This includes information or opinion about a person's health status and medical history, whether recorded or not

Sensitive information refers to information relating to a person's racial or ethnic origin, political opinions, religion, trade union, or other professional, or trade association membership, sexual preferences, or criminal record

Policy

Personal information is collected and used by the GLS to:

- provide services or to carry out the school's statutory functions,
- assist the school services and its personnel to fulfil its duty of care to learners,
- plan, resource, monitor and evaluate services and functions,
- comply with ACT Government reporting requirements,
- comply with statutory and or other legal obligations in respect of staff,
- investigate incidents or defend any legal claims against the School, its services or its staff, and
- comply with laws that impose specific obligations regarding the handling of personal information.

Collection of personal information

The GLS collects and holds personal information about learners, parents and relevant personnel.

Use and disclosure of the personal information provided

Learners and Parents

The purposes for which the School uses personal information of learners and parents include:

- keeping parents informed about matters related to their child's schooling,
- looking after learners' educational, social and health needs,
- celebrating the efforts and achievements of learners,
- day-to-day administration,
- satisfying the School's legal obligations, and
- allowing the School to discharge its duty of care.

Relevant personnel

The purposes for which the GLS uses personal information of relevant personnel include:

- assessing the suitability for employment,
- administering the individual's employment or contract,
- for insurance purposes, such as public liability or worker's compensation,
- satisfying the School's legal requirements, and
- investigating incidents or defending legal claims about the School, its services or staff.

The GLS will use and disclose personal information about a learner, parent and relevant personnel when:

- it is required for general administration duties and statutory functions,
- it relates to the purposes for which it was collected, and
- for a purpose that is directly related to the reason the information was collected and the use would be reasonably expected by the individual and there is no reason to believe they would object to the disclosure.

The GLS can disclose personal information for another purpose when:

- the person consents, or
- it is necessary to lessen or prevent a serious or imminent threat to life, health or safety or
- is required by law or for law enforcement purposes.

Consent

Where consent for the use and disclosure of personal information is required, the school will seek written consent from the appropriate person. In the case of a learner's personal information, the school will seek the consent from the learner and/ or parent depending on the circumstances and the learner's capacity to understand the consequences of the proposed use and disclosure.

In the case of children enrolled at the GLS, the school will generally seek the consent of the child's parents and will treat consent given by the parent as consent given on behalf of the student.

Accessing personal information

A parent, learner or relevant personnel may seek access to their personal information, provided by them, that is held by the GLS.

Access to other information may be restricted according to the requirements of laws that cover the management of school records.

Updating personal information

The School aims to keep personal information it holds accurate, complete and up-to-date. A learner or their parent has a responsibility to inform the school when important personal information has changed, for example, contact details. A person may update their personal information by contacting the Secretary, the Principal of the Children's Division or the Coordinator of the Adult's Division of the school.

Use of photographs

The school may use photographs of groups of learners in its communications and marketing material, including the school's website and Facebook page. Group photos may also be provided to the embassies of German-speaking countries for use in their communications media. Permission from the learner, or, in the case of a child, from their parent, will be sought before an image is published. Consent to use a learner's image is also induced in the enrolment form for the Children's Division.

Complaints under this policy

Should the school receive a complaint about personal information privacy this will be investigated in accordance with GLS' Complaints Handling Policy.

Authorisation

This policy is authorised by the GLS' Management Committee.

Review

This policy will be reviewed by the GLS' Management Committee, at least every three years, or more frequently in response to feedback or legislative changes.