



PRIVACY & PROTECTED DISCLOSURE POLICY

The provisions of the Privacy Act 1993 and Protected Disclosures Act 2000 as they relate to staff and students will apply at all times.

PROTECTED DISCLOSURE

If an employee has reasonable grounds to believe that there is a serious wrongdoing as defined in section 2 of the Act, the Principal is to be informed and the identity of the informant will remain confidential to the Principal. If the Principal is believed to be involved in the wrongdoing, the Chairperson of the Board of Trustees is to be informed and the identity of the informant will remain confidential to the Chairperson of the Board of Trustees.

Employees making disclosures will be protected against retaliatory or disciplinary action and will not be liable for civil or criminal proceedings relating to disclosure.

Disclosures will be treated with the utmost confidence and must be in writing for an investigation to be instigated.

A disclosure may be made to an appropriate authority if the employee making the disclosure has reasonable grounds to believe the Principal and the Chairperson of the Board of Trustees may both be involved in the wrongdoing; or immediate reference to another authority is justified by urgency or exceptional circumstances; or there has been no action or recommended action within 20 working days of the date of disclosure.

At the conclusion of the investigation a report will be prepared with recommendations for action if appropriate.

PRIVACY PROCEDURES AND GUIDELINES

The Privacy Officer (appointed annually by the Board of Trustees) is responsible for dealing with requests made under the Act, working with the Privacy Commissioner in the event of any complaints being received and otherwise encouraging compliance with the Act by the school.

The Board of Trustees will conduct an internal audit every three years to ensure that the policies and procedures surrounding individual privacy are being adhered to.

Disclosure:

Personal information must not be disclosed to a third party unless:

- There is reasonable belief that disclosure is one of the purposes for which the information is being obtained;
- The information is publicly available;
- Disclosure is authorised by the individual concerned;
- Disclosure is necessary to prevent a serious and imminent threat to public health or safety.

Collection of personal information:

Information collected must be necessary for the purpose of the school activity. Enrolment forms, leaving forms and applications for jobs and tertiary institutes will include an authorisation from the individual which permits the school to collect certain information and, in some instances, to disclose the information.

Source of personal information:

Information is to be gathered directly from the person concerned or in the case of a student under the age of 16 from the student or that student's parent or legal guardian. This is not necessary if:

- The information is publicly available;
- The individual concerned authorises collection of the information from someone else;
- Non-compliance is necessary to maintain law and order or, if the health and safety of other parties is at risk. In this event, only the Principal may consent to the release of information.

Advising of purpose of collection of information:

Reasonable steps must be taken to ensure that the individual from whom information is collected is aware of the fact that it is being collected, the purpose for which it is being collected, the intended recipients of the information, and rights of access to and correction of the personal information.

Storage and security of personal information:

All personal information is to be kept secure and stored in a manner that will minimise loss and access by unauthorised persons.

Students:

- Student files are to be kept in the Administration Office and information held by staff is to be kept in files that are secure. Access to the Student Management System (SMS) will be limited to staff and there will be limitations on the level of access. Access to student files is limited to the student and to staff. Parents and legal guardians of students under the age of 16 may have access, preferably with the consent of the student.

Staff:

- Staff files are stored in the Principal's Office. Access to the files is limited to the individual, the Principal and the Principal's Personal Assistant. For salary purposes, limited access is available to the Business Manager and/or Payroll Salaries Clerk who must request the relevant information. Access to the Staff Database is limited to staff and the information on the database is provided by the individual.

Correction of personal information:

The individual concerned shall be entitled to request correction of the information and to request that there be attached to the information a statement of any correction sought but not made, e.g. in the case of a student who requests that their name be changed and there is no documentary evidence to support the request (birth certificate, passport, deed poll).

Holding of information:

Personal information will not be held for longer than is required for the purposes for which the information may lawfully be used.

Signed:**Date Signed****Date of Ratification:** December 2017**Next Review Date:** 2020