



Privacy Policy

Scope of Policy and Source of Obligation

In the course of Golden Grove Lutheran Primary School's activities, we manage and protect personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the 13 Australian Privacy Principles (APPs).

Scope of policy

This policy outlines the circumstances in which we obtain personal information, how we use and disclose that information and how we manage requests to access and/or change that information.

What is personal information and how do we collect it?

Personal information is information or an opinion about an individual from which they can be reasonably identified. Depending on the circumstances, we may collect personal information from the individual in their capacity as a student, contractor, volunteer, stakeholder, job applicant, alumni, visitors or others that come into contact with the school.

In the course of providing services we may collect and hold:

- Personal Information including names, addresses and other contact details; dates of birth; next of kin details; photographic images; attendance records and financial information.
- Sensitive Information (particularly in relation to student and parent records) including government identifiers (such as TFN), religious beliefs, nationality, country of birth, professional memberships, family court orders and criminal records.
- Health Information (particularly in relation to student and parent records) including medical records, disabilities, immunisation details and psychological reports.

As part of our recruitment processes for employees, contractors and volunteers, we may collect and hold:

- Personal Information including names, addresses and other contact details, dates of birth, financial information, citizenship, employment references, regulatory accreditation, media, directorships, property ownership and driver's licence information.



- Sensitive Information including government identifiers (such as TFN), nationality, country of birth, professional memberships, family court orders and criminal records.
- Health Information (particularly in relation to prospective staff and student records) including medical records, disabilities, immunisation details and psychological reports.

Generally, we will seek consent from the individual in writing before we collect their sensitive information (including health information).

It is noted that employee records are not covered by the APPs where they relate to current or former employment relations between the school and the employee.

Collection of personal information

The collection of personal information depends on the circumstances in which Golden Grove Lutheran Primary School is collecting it. If it is reasonable and practical to do so, we collect personal information directly from the individual.

At or before the time of collection, or as soon as practicable afterwards, we will take reasonable steps to notify individuals of the matters required under APP 5, including the purposes of collection and how information may be used and disclosed. This notification is typically provided through a collection notice accompanying enrolment forms, consent forms, employment applications and other data collection documents.

Solicited Information

Golden Grove Lutheran Primary School has, where possible, 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 also receive personal information by email, letters, notes, via our website, 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 third-party administrator, referees for prospective employees) or independent sources. However, we will only do so where it is not reasonable and practical to collect the personal information from the individual directly.

Information collected from our website

We may collect information based on how individuals use our website. We use "cookies" and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns and to record statistics on web traffic.

We use the following categories of cookies on our website:

- Essential/functional cookies: These are necessary for the website to operate and cannot be disabled. They do not collect personal information.



- Analytics cookies: We use Google Analytics (operated by Google LLC, United States) to collect aggregated, anonymised data on how visitors use our site, including pages visited and session duration. Google Analytics may set cookies that collect a unique identifier associated with your browser. This data is processed by Google in the United States. We have configured Google Analytics to anonymise IP addresses and have not enabled any advertising or remarketing features.
- Third-party embedded content: Our website may include content embedded from third-party platforms (such as Canva or YouTube). These platforms may set their own cookies when you interact with embedded content. We do not control these cookies and recommend reviewing the privacy policies of those platforms.

Where cookies collect information that constitutes personal information under the Privacy Act, we handle that information in accordance with this policy and the APPs. Most analytics data collected through our website cannot reasonably identify individual visitors.

You may disable cookies through your browser settings. Disabling analytics or third-party cookies will not prevent you from accessing our website.

Unsolicited information

Golden Grove Lutheran Primary School may be provided with personal information without having sought it through our normal means of collection. This is known as “unsolicited information” and is often collected by:

- Misdirected postal mail – Letters, Notes, Documents
- Misdirected electronic mail – Emails, electronic messages
- Employment applications sent to us that are not in response to an advertised vacancy
- Additional information provided to us which was not requested.

Unsolicited information obtained by Golden Grove Lutheran Primary School will only be held, used and or disclosed if it is considered as personal information that could have been collected 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 personal information as appropriate.

Collection and use of sensitive information

We only collect sensitive information if it is:

- reasonably necessary for one or more of these functions or activities, and we have the individual’s consent
- necessary to lessen or prevent a serious threat to life, health or safety
- another permitted general situation
- another permitted health situation.

We may share sensitive information to other entities in our organisation structure, but only if necessary for us to provide our products or services.

CCTV surveillance



Golden Grove Lutheran Primary School operates CCTV cameras on school premises for the purposes of safety, security and the wellbeing of students, staff and visitors.

CCTV footage may constitute personal information where individuals are identifiable from the footage. We handle all CCTV footage in accordance with the APPs and the Surveillance Devices Act 2016 (SA).

We will take reasonable steps to notify individuals that they may be recorded by CCTV, including through appropriate signage at entry points to areas under surveillance.

CCTV footage is retained for a maximum of 31 days from the date of recording, after which it is securely overwritten and deleted. Footage that has been identified as relevant to a specific security incident, child safety matter, legal proceeding, insurance claim, or other legitimate purpose may be retained for longer, but only for as long as is necessary for that purpose.

Access to CCTV footage is restricted to authorised personnel only. Footage will only be disclosed to third parties (including law enforcement) where required or authorised by law, or where the disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of an individual.

How do we use personal information?

Golden Grove Lutheran Primary School only uses 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 for an activity or purpose 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 school community matters through correspondence, newsletters and magazines
- marketing, promotional and fundraising activities
- supporting the activities of school groups such as P & F or Old Scholars
- supporting the activities of the Building Fund and the like
- supporting community based causes and activities, charities and other causes in connection with the School'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
- school administration including for insurance purposes
- the employment of staff
- the engagement of volunteers.

We will only use or disclose sensitive or health 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.



We may share personal information with other entities within the Lutheran Education SA/NT/WA network and Lutheran Education Australia, but only if necessary for us to provide our services or to comply with our obligations as a member of that network.

The school may disclose information about an individual to overseas recipients only when it is necessary, for example to facilitate a student exchange program.

Direct marketing

Where we use personal information for marketing, promotional or fundraising communications (including electronic communications), we do so on the basis that you would reasonably expect to receive such communications given your relationship with the school, or with your consent.

In accordance with APP 7, you may opt out of receiving direct marketing communications from us at any time. To opt out, please contact our Privacy Officer using the details set out at the end of this policy.

All commercial electronic messages we send (including newsletters, fundraising appeals and promotional emails) comply with the Spam Act 2003 (Cth) and include an unsubscribe mechanism. Requests to unsubscribe will be processed promptly.

Government identifiers

We may collect government identifiers (such as Tax File Numbers) where this is required for the lawful purposes for which they are provided (for example, payroll processing). We will not adopt a government identifier as our own identifier for an individual, and will not use or disclose government identifiers except where permitted or required by law.

Storage and Security of Personal Information

How we store personal information

Golden Grove Lutheran Primary School stores Personal Information in a variety of formats including, but not limited to:

- databases
- hard copy files
- personal devices, including laptop computers
- third party storage providers such as cloud storage facilities
- paper based files.

Security measures

Golden Grove Lutheran Primary School takes all reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

These steps include, but are not limited to:

- Restricting access and user privilege of information by staff depending on their role and responsibilities.
- Ensuring staff do not share personal passwords.



- Ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege.
- Ensuring access to Golden Grove Lutheran Primary School's premises are secured at all times.
- Implementing physical security measures around the school buildings and grounds to prevent break-ins.
- Ensuring our IT and cyber security systems, policies and procedures are implemented and up to date.
- Ensuring staff comply with internal policies and procedures when handling the information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers (e.g. TASS, FACTS and Toddle), to ensure as far as practicable that they are compliant with the APPs or a similar privacy regime.
- The destruction, deletion or de-identification of personal information we hold that is no longer needed, or required to be retained by any other laws.

Our public website may contain links to other third-party websites outside of Golden Grove Lutheran Primary School. Golden Grove Lutheran Primary School is not responsible for the information stored, accessed, used or disclosed on such websites and we cannot comment on their privacy policies.

Records retention and destruction

We retain personal information only for as long as it is necessary for the purpose for which it was collected, or as required by law. Different categories of records are subject to different retention periods, including under the State Records Act 1997 (SA) and applicable education sector requirements.

As a general guide:

- Student enrolment and academic records are retained for a minimum period in accordance with the school's Records Management Policy and applicable legislative requirements.
- Student health and child protection records are retained for extended periods as required by the Children and Young People (Safety) Act 2017 (SA) and related legislation.
- Employment and contractor records are retained in accordance with applicable employment and taxation laws.
- CCTV footage is retained for a maximum of 31 days unless required for a specific purpose (see CCTV section above).
- Financial records are retained in accordance with applicable taxation and corporate law requirements.

When personal information is no longer required to be retained, we will take reasonable steps to destroy it or ensure it is de-identified. Destruction will not occur where legal proceedings are reasonably anticipated or ongoing.



Responding to data breaches

Golden Grove Lutheran Primary School will take appropriate, prompt action if we have reasonable grounds to believe that an eligible data breach has occurred or is suspected to have occurred.

Under the Notifiable Data Breaches scheme, an 'eligible data breach' is one involving unauthorised access to, or disclosure of, personal information that is likely to result in serious harm to any of the individuals to whom it relates. Where we have reasonable grounds to suspect an eligible data breach has occurred, we will conduct an assessment within 30 days.

Depending on the outcome of that assessment, our response may include: a review of our internal security procedures, remedial internal action, notification to affected individuals, and notification to the Office of the Australian Information Commissioner (OAIC).

If we are unable to notify individuals directly, we will publish a statement on our website and take reasonable steps to publicise the contents of that statement.

Individuals who believe their personal information may have been compromised in a data breach may also make a complaint to the OAIC.

Disclosure of personal information

Personal information is used for the purposes for which it was given to Golden Grove Lutheran Primary School, or for purposes which are directly related to one or more of our functions or activities.

Personal information may be disclosed to government agencies, other parents, other schools, recipients of school publications, visiting teachers, counsellors and coaches, our services providers, agents, contractors, business partners, related entities and other recipients from time to time, if the individual:

- Has given consent; or
- Would reasonably expect the personal information to be disclosed in that manner.

Golden Grove Lutheran Primary School may disclose personal information without consent or in a manner which an individual would reasonably expect if:

- We are required to do so by law.
- The disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety.
- Another permitted general situation applies.
- Disclosure is reasonably necessary for a law enforcement related activity.
- Another permitted health situation exists.

Where the school is required to share information for child safety or mandatory reporting purposes under the Children and Young People (Safety) Act 2017 (SA) or other applicable legislation, this may occur without the individual's consent. Such disclosures take precedence over the privacy protections in this policy.



Disclosure of your personal information to overseas recipients

Personal information about an individual may be disclosed to an overseas organisation in the course of providing our services. This most commonly occurs when information is stored with cloud service providers whose infrastructure is located outside Australia, such as Microsoft (Microsoft 365).

Before disclosing personal information to an overseas recipient, we must take reasonable steps to ensure the overseas recipient does not handle the information in a way that would breach the APPs. Where we disclose personal information to overseas recipients, Golden Grove Lutheran Primary School remains accountable for ensuring that personal information is handled in accordance with the APPs.

We will not disclose personal information to overseas recipients unless:

- we have taken reasonable steps to ensure the recipient handles the information consistently with the APPs (including by reviewing data processing agreements and privacy certifications of cloud service providers);
- we have the individual's consent (which may be implied from the circumstances);
- 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.

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.

At Golden Grove Lutheran Primary School 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 school's duty of care to the student.



The quality of personal information

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up-to-date, including at the time of using or disclosing the information. We request families to review and update their contact and health information at enrolment and at the commencement of each school year.

If Golden Grove Lutheran Primary School becomes aware that the Personal Information is incorrect or out of date, we will take reasonable steps to rectify the incorrect or out of date information.

Access and correction of personal information

You may submit a request to us to access the personal information we hold about you, or to request that we correct personal information we hold about you. Upon receiving such a request, we will take steps to verify your identity before granting access or correcting the information.

We will respond to access and correction requests within 30 days of receipt. We do not charge a fee for making an access or correction request, or for receiving access to your information.

If we reject an access request, we will notify you in writing and provide reasons for our decision. Grounds on which access may be refused include those set out in the Privacy Act (for example, where providing access would unreasonably impact the privacy of other individuals, or where the information relates to legal proceedings).

If we reject a correction request, you may make a statement about the requested correction and we will attach this to your record.

Where personal information we hold about you has been corrected and was previously disclosed to third parties, we will take reasonable steps to notify those third parties of the correction, where it is practicable to do so.

Complaints

You can make a complaint about how Golden Grove Lutheran Primary School manages personal information, including a breach of the APPs, by notifying us in writing as soon as possible. We will respond to the complaint within a reasonable time (usually no longer than 30 days) and we may seek further information in order to provide a full and complete response.

Golden Grove Lutheran Primary School does not charge a fee for the handling of complaints.

If you are not satisfied with our response, you may refer the complaint to the OAIC. A complaint can be made using the OAIC online Privacy Complaint form or by mail, fax or email.



A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

How to contact us

Golden Grove Lutheran Primary School can be contacted about this Privacy Policy or about personal information generally, by:

- Emailing rowland.tanya@goldengrove.sa.edu.au
- Calling 8282 6000
- Writing to our Privacy Officer at PO Box 1371, Golden Grove, SA, 5125.

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

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 www.goldengrove.sa.edu.au regularly for any changes.

Policy Details and Version History



Version: 1.2	Approved: School Board, June 2024	Development / Review Team School Leadership Team
Administered by: Principal	Next Review: June, 2026	

Version History			
Version	Dated	Officer	Amendment details
V.1.0	2014	Principal	Original policy approved by School Board
V. 1.1	2018	Principal	Updated policy included requirements re Australian Privacy Principles
V.1.2	2024	Principal	Reviewed version of policy, updated contact details
V.1.3	2026	Principal	Reviewed version of policy to align with updated Complispace template and 2024 Privacy Act amendments; CCTV retention, cookies, records retention, APP 12 and 13 access timeframes, Spam Act, and cross-border accountability added or updated.

