

DSM Policy

Privacy

Deutsche Schule Melbourne Inc, ABN 52 936 931 854



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2. Purpose

The purpose of this policy is to outline how Deutsche Schule Melbourne (DSM) collects, uses, discloses and manages requests to access and/or change personal information. The School is bound by the Australian Privacy Principles (APPs) and its obligations contained in the Privacy Act 1988 (Cth), as well as the Health Records Act 2004 (Vic).

3. Scope

This policy applies to all staff, students, parents/guardian(s), volunteers, contractors, job applicants, visitors and the wider School community.

4. Policy Statement

DSM is committed to respecting and protecting the privacy of every individual and to processing personal data responsibly and transparently, and in compliance with all applicable legal requirements.

5. Principles

This Policy is based on the following principles that the School:

- supports responsible and transparent handling of personal information
- only collects personal information that is reasonably necessary for the School's function or activities
- use fair and lawful means to collect personal information
- obtain consent to collect sensitive information unless specified exemptions apply
- take reasonable steps to protect the personal information it holds from misuse, interference and loss from unauthorised access, modification or disclosure
- only use or disclose personal information for the primary purpose of collection unless an exemption applies

6. Procedure

6.1 What kinds of personal information do we collect?

The types of information DSM collects include (but are not limited to) personal information about students, parent/guardian(s), job applicants, volunteers, contractors, visitors and other people.

Students and parents/guardian(s):

- name, contact details (including next of kin), date of birth, gender, language background and previous school information;

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- parents' education, occupation, language spoken at home, nationality and country of birth;
- health information (e.g., details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports and names of doctors);
- results of assignments, tests and examinations;
- conduct and complaint records, or other behaviour notes, and School reports;
- information about referrals to government welfare agencies;
- counselling reports;
- any Family Court orders;
- criminal records;
- volunteering information; and
- photos and videos at School events.

Job applicants, volunteers and contractors:

- name, contact details (including next of kin) and date of birth;
- information on job application;
- relevant qualifications, prior work experience, and history;
- reference and background checks from referees and previous employers
- working with children checks (WWCC) and National Police Record Check
- salary and payment information, including superannuation details;
- health information (e.g., details of disability and/or allergies, and medical certificates);
- complaint records and investigation reports;
- leave details;
- photos and videos at School events;
- workplace surveillance information; and
- work emails and private emails (when using a work email address), and Internet browsing history.

Visitors and other people:

- name, contact details;

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- any other personal information necessary and relevant to the reason for the individual's contact with the School.

Prospective students and parents:

- Title (Mr, Mrs, etc.) parent
- First name parent
- Last name parent
- Email address parent
- Phone number parent
- How did the parent hear about our School tour/Open Day?
- Title child
- First name child
- Last name child
- Date of birth of the child
- Gender child
- Entry year child
- Year level child
- German knowledge child

6.2 How do we collect personal information?

6.2.1 *Personal information you provide:*

The School generally collects personal information about an individual directly from the individual or, in the case of students, their parent/guardian(s). DSM will endeavour to only ask for your personal information if it is reasonably necessary for the activities that you are seeking to be involved in. This includes, by way of:

- forms
- face-to-face meetings
- interviews
- emails
- telephone calls

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- visitors log at reception
- website open day registration form
- website School tour registration form
- website contact us form
- online event booking sites such as TryBooking and SafeTicket
- School open days
- enrolment details

6.2.2 *Personal information provided by other people:*

In some circumstances, DSM may be provided with personal information about an individual from a third party, for example, a report from a medical professional, a reference from another school, or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information from the student's previous school to facilitate the transfer.

6.2.3 *Personal information generated by artificial intelligence (AI) systems:*

We might also collect personal information that AI systems generated or help generate. The kinds of personal information that AI systems may generate include those set out in section 6.1 above.

6.2.4 *Third-Party marketing and communication tools that may generate and handle personal information:*

The School also utilises:

- School Management Systems (SMS) that store administrative, academic and financial operations. This may include student attendance, reporting, parent communication etc.
- cookies to improve your website experience and provide more personalised services to you, both on the DSM website and through other media.
- website analytics tools such as Google Analytics, where information is collected and used for statistical analysis to improve the functionality of the School website.
- search engine optimisation (SEO) metrics, and advertising (Google Ads) metrics, where information is collected to lead users to the School's website.
- Social media channels such as META (Facebook/Instagram) and LinkedIn.
- funnel emails are issued via invitation by the School on enrolment, events and via booking forms.
- Customer Relationship Management (CRM) systems, where we collect personal information from childcare centre staff, German playgroup staff/parents, staff of German organisations and companies, other primary schools, as well as other important contacts of the School.

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6.2.5 Personal information from other sources:

We may also collect personal information through lawful security surveillance activities such as CCTV security cameras and through monitoring the use of email and IT systems. Access to the recorded CCTV footage is limited to authorised staff with a legitimate reason to view, such as supporting evidence of a breach at the School.

6.2.6 Employee personal Information:

Information the School holds about its employee's that relates directly to their current or former employment is generally exempt from the Privacy Act. This exemption applies to private sector employers, such as independent schools. The Privacy Act only applies to an employee record if the information is used for a purpose not directly related to the employment relationship as defined in [Employment | OAIC](#).

6.3 Purpose for which we collect personal information

The purpose for which the School collects, uses and discloses personal information depends on our relationship with you and may include the following:

Students and parent/guardian(s):

- admission and enrolment;
- providing schooling and School activities;
- satisfying the needs of parent/guardian(s), the needs of students and the needs of the School during the whole period a student's enrolment in the School;
- making the required reports to government authorities;
- keeping parent/guardian(s) informed about matters related to their child's schooling, through correspondence, apps, newsletters and magazines;
- day-to-day administration of the School;
- looking after students' educational, social, spiritual and health wellbeing and
- satisfying the School's legal obligations and allowing the School to discharge its duty of care.

Volunteers:

- to contact you about, and administer the volunteer position;
- administrative matters, including for insurance purposes; and
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

Job applicants, contractors and others:

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- assessing and, if successful, engaging an applicant or contractor;
- administering an individual's employment or contract;
- administrative matters, including for insurance purposes and
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

Automated decision making:

Our School does not use any automated decision-making systems. All decisions are made by human staff, using their professional judgment and in accordance with our policies and procedures. Should our practices change in the future, we will update this policy and communicate the changes to all relevant stakeholders.

6.4 Who do we disclose personal information to?

The School may disclose personal information, including sensitive information, to third parties for educational, care, and administrative purposes, and to seek support and advice. This may include:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student, and schools within the same;
- government departments (including for policy and funding purposes);
- medical and health practitioners;
- people providing educational support and health services to the School, including specialist visiting teachers, health professionals, sports coaches, volunteers and counsellors;
- fundraising organisations, venues and event organisers, marketing and communication agencies;
- specialist advisory services, including in human resources, child protection and students with additional needs) and providers of learning and assessment;
- personal information for administrative, educational and research purposes, including;
 - the Australian Curriculum, Assessment and Reporting Authority (ACARA);
 - NAPLAN Test Administration Authorities;
 - Victorian Curriculum and Assessment Authority (VCAA);
 - Nationally Consistent Collection of Data (NCCD) for quality assurance processes;
 - participation in the Australian Early Development Census (AEDC) and;
- legislation, including the Commission for Children and Young People (CCYP), Victorian;
- Institute of Teaching (VIT) and Victoria Police;
- people and organisations providing administrative, technology, professional, and other providers of specific information management and storage systems;
- other financial institutions for payment processing;

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- recipients of School publications, such as newsletters and magazines;
- students' parent/guardian(s);
- anyone you authorise the School to disclose information to and;
- anyone to whom the School is required or authorised by law to disclose the information, including child protection laws.

6.5 How do we store personal information?

We store your personal information in hard copy and electronically. The School uses information management and storage systems provided by third-party service providers including CRM, SMS and 'cloud' service providers. Personal data is stored with and accessible by the third-party service providers for the purpose of providing services to the School in connection with the Systems.

6.6 Sending and storing information overseas

DSM may need to disclose personal information about an individual to third parties located outside of Australia such as Germany or Austria in the following situations:

- to facilitate internships for International University Students
- students transitioning between DSM and German Schools or the German School Abroad

Information may be stored with a 'cloud' service provider that may store data outside of Australia. DSM will make all reasonable attempts to work with providers who store data in Australia and disclose this information to individuals, and if reasonably possible, seek the individual's consent, prior to proceeding. The School will comply with the requirements of the Privacy Act 1998 (Cth) and the APPs that apply to cross-border disclosures of personal information.

6.7 Fundraising and marketing

The School treats marketing and fundraising for future growth and development as essential to ensuring that the School remains a quality learning environment where both pupils and staff thrive. Personal information held by the School may be disclosed to an organisation that assists in the School's fundraising, for example, a foundation or alumni organisation.

Parent/guardian(s), staff, contractors, and other members of the wider School community may receive fundraising information. School publications, such as newsletters, that include personal information, may be used for marketing purposes.

We regularly send direct marketing material to prospective parents, childcare centres, playgroups, German organisations and companies, as well as other essential School contacts, if they have consented to receiving such information. From time to time, and in support of our future development and growth, we will send direct marketing material if you have consented to receiving such information.

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If you do not want to receive any such information, you can contact the School by email at info@dsm.org.au or unsubscribe from our Funnel/HubSpot newsletters. Once we receive a request to “opt out” of receiving marketing information, we will cease sending it within a reasonable period.

6.8 Security of personal information

DSM takes reasonable steps to protect personal information under our control from misuse, interference, loss, and unauthorised access, modification, or disclosure. In the event of a data breach, prompt remedial action will be taken and actioned as per the School’s Data Breach Response Plan.

We protect personal information in several ways, including:

- paper records are kept in locked storage
- website security using firewalls and anti-virus software, and
- system access, such as password protection and restricted access.

Personal information will be retained for only as long as it is needed, including for archival purposes, and will be disposed of lawfully and securely as defined by the Public Records Act 1973 (Vic).

6.9 Access and updating personal information

We are always committed to holding accurate and up-to-date personal information. We encourage you to update DSM about any changes to your personal information. Parent/guardian(s) can update their contact details via the School Management System. For all other updates, you can contact our Administration Office via email at info@dsm.org.au.

6.10 Consent and rights of access to the personal information of students

Generally, the School will refer any request for consent or notice regarding a student’s personal information to the student’s parent/guardian(s). The School will treat consent given by the parent/guardian(s) as consent given on behalf of the student, and notice to the parents/guardian(s) will act as notice to the student.

We may refuse access to personal information in certain circumstances. These might include:

- (a) giving access to the information would pose a serious threat to the life, health or safety of a person;
- (b) giving access would have an unreasonable impact on the privacy of a person;
- (c) the information relates to existing or anticipated legal proceedings and would not be available under the discovery process; or
- (d) denying access is required or authorised by an Australian law or court order.

Parent/guardian(s) may seek access to personal information held by the School about them or their child by contacting the Administration Office via email at info@dsm.org.au. We will seek to handle all requests for access to personal information as quickly as possible.

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6.11 Enquiries and complaints

If you have any questions relating to this policy, or you would like to lodge a complaint or believe a breach has occurred, please to contact us either:

- (a) by email on info@dsm.org.au
- (b) by phoning us on +61 3 9489 9364; or
- (c) by writing to the Business Manager.

We will investigate any complaint and will notify the individual of a decision in relation to the complaint as soon as practicable. If you are not satisfied with the response, you can refer the complaint to the Office of the Australian Information Commissioner on www.oaic.gov.au

7. Definitions

7.1 **"AI Systems"** refers to Artificial Intelligence (AI)

7.2 **"Australian Privacy Principles (APPs)"** are defined by the Privacy Act 1988, they govern standards, rights and obligations around:

- (a) the collection, use and disclosure of personal information
- (b) an organisation or agency's governance and accountability
- (c) integrity and correction of personal information
- (d) the rights of individuals to access their personal information.

7.3 **"Automated decision-making"** is when algorithms or Artificial Intelligence is used to make decisions that could impact an individual's rights. This includes situations where personal information is used by the program in the decision-making process.

7.4 **"Cross-border disclosure"**, refers to the practice of sharing personal information across international borders.

7.5 **"Data Breach"**, is a security incident in which personal information held by the School is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference.

7.6 **"Health Records Act 2001 (Vic)"** promotes fair and responsible handling of health information by:

- (a) protecting the privacy of an individual's health information that is held in the public and private sectors; and

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- (b) providing individuals with a right of access to their health information; and
- (c) providing an accessible framework for the resolution of complaints regarding the handling of health information.

7.7 **“Personal information”** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

7.8 **“Privacy Act 1988 (Cth.)”** was introduced to promote and protect the privacy of individuals and to regulate how Australian Government agencies and organisations with an annual turnover of more than \$3 million, and some other organisations, handle personal information.

7.9 **“Sensitive information”** is a special category of personal information. Sensitive information means information or an opinion about an individual’s (i) racial or ethnic origin, (ii) political opinions, (iii) membership of a political association, (iv) religious beliefs or affiliations, (v) philosophical beliefs, (vi) membership of a professional or trade association, (vii) membership of a trade union, (viii) sexual orientation or practices, (ix) criminal record, that is also personal information;

- (a) health information about an individual,
- (b) genetic information about an individual that is not otherwise health information;
- (c) biometric information that is to be used for automated biometric verification or biometric identification, or
- (d) biometric templates.

7.10 **“The School”** refers to Deutsche Schule Melbourne (DSM).

7.11 **“The School community”** refers to staff, students, parents/guardian(s), volunteers, contractors, job applicants, visitors, and families on the enrolment waiting list.

Revised, February 2026