

GISS Privacy Policy

Purpose

This Privacy Policy sets out how GISS collects and manages personal information provided or collected.

This policy details how GISS complies with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). In relation to health records, GISS is also bound by New South Wales Health Privacy Principles which are contained in the Health Records and Information Privacy Act (NSW) 2002 ('Health Records Act').

Who do we collect personal information from?

Information is collected from various groups, including students, parents or legal guardians, staff members, volunteers, contractors, and visitors.

What kinds of personal information does GISS collect and why?

GISS collects personal and sensitive information (such as contact details, behavioural and health records, and academic records) for a variety of purposes vital to the operation and provision of a safe, efficient, and effective educational environment.

These purposes include but are not limited to:

- facilitating student enrolment;
- tracking and reporting on academic performance;
- catering to individual learning needs;
- managing student health and welfare matters;
- managing student behavioural and/or disciplinary matters;
- communicating with parents and legal guardians;
- fulfilling legal and regulatory obligations;
- supporting the hiring and management of staff;
- enabling participation in extracurricular activities;
- maintaining school records;
- facilitating community engagement and marketing efforts; and
- ensuring the safety and security of the school community.

The collection of such information is done in accordance with the relevant privacy laws and regulations to safeguard the rights and privacy of individuals.

Images, Photos, and Videos:

We may take photographs or record videos of students for use in school publications, website content, social media posts, and other promotional materials. If you do not want your child's image to be used in this way, please let us know by completing the opt-out form.

Please be aware that while we will make every effort to respect your request, we cannot guarantee absolute compliance due to practical constraints. For instance, your child may appear incidentally in photographs or video footage of school events or activities."

How will GISS use the personal information you provide?

We limit the use of personal information to what is reasonably required for our operations or activities, and other purposes that you would likely anticipate, or one to which you have given your consent.

Education: GISS uses personal information to facilitate learning and teaching. This includes tracking academic progress, providing personalised learning, managing student portfolios, and communicating about student achievements or concerns.

Student Welfare and Safety: Personal information is critical for protecting student wellbeing and safety. This includes health information for care purposes, emergency contact information, and behavioural records.

Administrative Functions: GISS uses personal information for administrative tasks such as enrolment, attendance tracking, planning, and managing school resources and services. This also includes communication with parents or guardians about school events, activities, and updates.

Employment and Contractual Obligations: GISS collects personal information about staff, volunteers, and contractors for hiring, payroll, performance evaluation, and to fulfill contractual obligations.

Legal Compliance: GISS is legally required to maintain certain records and report to governmental bodies. This includes information related to student enrolment, attendance, academic progress, and safeguarding incidents.

Community Engagement and Marketing: GISS may use personal information (with consent where required) to engage with the community and promote school activities, achievements, and services. This includes our newsletters, App updates, marketing materials, and alumni engagement.

Who might GISS disclose personal information to and store your information with?

GISS may disclose personal information, including sensitive information, held about an individual to:

- other schools
- government departments
- parents and legal guardians and nominated carers
- medical practitioners
- people providing services to GISS, including counsellors and specialist teachers
- recipients of School publications, such as Gutenberg Post
- anyone you authorise GISS to disclose information to
- anyone to whom we are required to disclose the information to by law

The amount and type of personal information the GISS may disclose to a 3rd party is limited to what is necessary for the specified purpose.

Sending and storing information overseas

GISS may disclose personal information about an individual to overseas recipients as needed, for instance, to facilitate a school exchange. However, GISS will take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- obtaining the consent of the individual (which may be implied)

or

- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

GISS may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

How does GISS treat sensitive information?

Sensitive information includes but is not limited to a person's racial or ethnic origin, religion, union or other professional or trade association membership, philosophical & political beliefs, sexual orientation, criminal record, health information and biometric information.

Sensitive information will only be used and disclosed only for the purpose for which it was provided, unless you explicitly agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Storage and Security of Personal Information at GISS

At GISS, we store personal information across various formats, including databases, hard copy files, and personal devices such as laptops, mobile phones, cameras, and other recording equipment.

GISS takes all reasonable measures to protect the data we hold about you from misuse, loss, unauthorized access, modification, or disclosure.

- Allowing access to information on GISS databases strictly on a 'need-to-know' basis. Staff members are provided varying levels of access depending on their roles, responsibilities, and security profiles.
- Ensuring all staff members understand the importance of maintaining the confidentiality of their personal passwords and using multi-factor authentication.
- If personal and health information is kept in hard copy files, these files are securely stored in lockable filing cabinets located in lockable rooms. Access to these records is strictly limited to relevant staff. Exceptions are made for medical action plans that need to be accessible by all staff.
- GISS has ICT security systems, in place to protect personal information on our networks.
- Taking reasonable steps to ensure any third-party service providers comply with the Australian Privacy Principles or an equivalent privacy regime. This includes cloud service providers, who may have access to personal information.

GISS is obligated to report any known or suspected data breaches to the Privacy Commissioner, the individuals affected, and the Office of the Australian Information Commissioner (OAIC) as soon as practicable. The notification will include details about the breach, type of information affected, and recommendations for impacted individuals on steps they can take in response.

Any personal information we hold that is no longer necessary is securely destroyed, deleted, or de-identified, as appropriate.

GISS's staff are required to respect the confidentiality of students' and parents & carers' personal information and the privacy of individuals.

Quality and accuracy of personal information

GISS takes great care to ensure the personal information we hold, use and disclose is accurate, complete and up to date.

GISS will perform at least one annual information update request via Email or the parent app.

We ask that individuals & families advise GISS when they become aware of changes to their personal information.

Parents are requested to contact GISS if any of the details they have provided change. They should also contact GISS if they believe that the information GISS has is not accurate, complete or up to date.

Access and correction of personal information

Under the Privacy Act and the Health Records Act, any individual, regardless of age, has the right to obtain access to personal information which GISS holds about them and to advise GISS of any perceived inaccuracy.

Students will generally be able to access and update their personal information through their parents & carers or Carer. However, older students may seek access and correction themselves. Certain exceptions to these rights are set out in the applicable legislation.

To make a request to access or update any personal information GISS holds about parents or students, requests can be sent to the Principal in writing. GISS will require the requestor to verify their identity and specify what information they require.

GISS will provide a written notice explaining the reasons for refusal if we cannot provide access to the information sought.

Consent and rights of access to the personal information of students

GISS respects every parent's right to make decisions concerning their child's education. Generally, GISS will refer any requests for consent and notices in relation to the personal information of a student to the student's parents & carers. GISS will treat consent given by parents & carers as consent given on behalf of the student, and notice to parents & carers will act as notice given to the student.

Parents & carers may seek access to personal information held by GISS about them or their child by contacting the Principal. However, there will be occasions when access may be denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of GISS's duty of care to the student.

GISS may, at its discretion, on the request of a student grant that student access to information held by GISS about them or allow a student to give or withhold consent to the use of their personal information, independently of their parents & carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

Document retention

GISS maintains and stores personal information as long as it is necessary for the fulfillment of the purposes for which it was collected, or as required by law. The retention period varies based on the type of information, its purpose, and legal requirements, with specific periods set out in relevant laws and regulations. Once personal information is no longer needed, it is our policy to securely destroy, delete, or de-identify it, as appropriate. This ensures that personal information is properly disposed of to prevent unauthorized access, use, or disclosure. Throughout this process, we adhere to the principles of the Privacy Act 1988 (Cth), ensuring the privacy and security of all personal and sensitive information we handle.

Enquiries and complaints

If you have further questions about the way GISS manages personal information or wish to lodge a complaint about what you believe to be a breach of the Australian Privacy Principles please contact the Business Manager. GISS will investigate any complaint and will notify you in relation to your complaint as soon as is practicable.

Changes to our practices and this policy

GISS may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to GISS's operations and practices and to make sure it remains appropriate to the changing school environment.

Document Management

Policy name	Privacy Policy
Version	3.0
School responsible	Principal
Board portfolio	Governance and Strategy
Version History	2.0 March 2023
Review / Update	4 March 2026
Next Review	Scheduled for March 2027
Approved by	Michael Cordes (Principal) and Tammie Christie (Board of Directors)

The information contained in this document is proprietary to the German International School Sydney. Any distribution or copying without the written consent of the German International School Sydney is prohibited.