

# Enkindle Village School



## Information Management Procedures

### 1. Statement

Enkindle Village School (Enkindle) is committed to ensuring that complete and accurate records are created, managed, stored and disposed of in accordance with legislative and agreed organisational requirements.

This document outlines the procedures undertaken at this school to manage information. Enkindle is committed to establishing, maintaining and continually improving its records management practices, processes and culture, and strives to establish a compliant, effective and efficient records management program led by the Executive Committee.

### General Procedures

Based on the principles from the Information Management Policy:

1. Records Management must be systematic and comprehensive.
  2. Records Management is everyone's responsibility.
  3. Records must be full and accurate and the systems that make, manage or keep them reliable and secure.
  4. Records must be retained for as long as they are required and disposed of in a lawful, planned and approved manner.
- A Privacy Officer is appointed by Enkindle Village School annually, who will be charged with reviewing privacy compliance.
  - An annual review of privacy procedures will occur using the review templates. See Appendix 1.
  - Enkindle will provide access to an individual's personal information notwithstanding exceptions as per Australian Privacy Principles. Notice to access should be in writing to the Privacy Officer or the Principal.

### Student Information collection and storage

- All electronic student enrolment and application information including medical information will be kept in secure databases on the Sharepoint system with restricted staff access. All paper based student enrolment and application information, including medical information will be kept in a locked file cabinet in the staff office, with restricted staff access.
- Birth certificates are sighted by the Principal and date of birth entered into the student database – signed off by the Principal. Hard or

electronic copied are not kept by the school once this process has occurred.

- Immunisation status reports are to be sighted by the Principal and entered into the student database. Hard or electronic copied are not kept by the school once this process has occurred.
- All parents are to be provided with a standard collection notice on admission. See Appendix 2.
- All parents are to receive and sign the photo and permission form. See Appendix 3.
- An annual review of the data will be completed with parents to provide any information changes to the office.

### **Staff Information collection and storage**

- All electronic staff information will be kept in secure databases on the Sharepoint system with restricted staff access. All paper based staff information will be kept in a locked file cabinet in the staff office, with restricted staff access.
- All staff and volunteers or contractors are to be provided with a standard collection notice on application. See Appendix 4 and 5.
- Understanding of the Privacy Policy is to be included as part of staff induction to the school in order to uphold the standard of the policy.

### **Data Breach**

A data breach concerns the security of personal information and involves the actual unauthorised access or disclosure of personal information, or the loss of personal information where the loss is likely to result in unauthorised access or disclosure.

- As Enkindle has obligations under the Privacy Act we are required to report certain breaches under the notifiable data breaches scheme (NDB Scheme).
- A data breach is an 'eligible data breach' (EDB) if it is likely to result in serious harm to an individual or individuals whose information is involved in the Data Breach.
- An adapted version of the OAIC Data Breach Response Summary setting out the steps to provide guidance for Schools regarding data breach can be found in Appendix 5.
- The Data Breach Summary is to be followed alongside the Data Breach Risk Assessment (Appendix 6). A Data Breach Response Plan (Appendix 7) is also to be completed.

### **Supporting Documentation**

- Enkindle Information Management Policy

## **2. Version Control**

**Approval Details**

|                      |                      |
|----------------------|----------------------|
| Policy Sponsor       | Secretary            |
| Approval authority   | Management Committee |
| Version Number       | 1                    |
| Date for next review | August 2020          |

**Modification History**

| Version no. | Approval date                | Implementation date          | Details |
|-------------|------------------------------|------------------------------|---------|
| 1           | August 12 <sup>th</sup> 2019 | August 13 <sup>th</sup> 2019 |         |
|             |                              |                              |         |

## APPENDIX 2:

### Standard Collection Notice

1. The School collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a pupil's enrolment at the School.

This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the School to provide schooling to pupils enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable pupils to take part in all the activities of the School.

2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.

3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health [and Child Protection]\* laws.

4. Health information about pupils is sensitive information within the terms of the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988*. We may ask you to provide medical reports about pupils from time to time.

5. The School may disclose personal and sensitive information for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- people providing administrative and financial services to the School;
- anyone you authorise the School to disclose information to; and
- anyone to whom the School is required or authorised to disclose the information to by law, including child protection laws.

6. Personal information collected from pupils is regularly disclosed to their parents or guardians.

7. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications.

Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia.

Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.

8. The School's Privacy Policy, accessible on the School's website, sets out how parents or pupils may seek access to and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the pupil, or where pupils have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.

9. The School's Privacy Policy also sets out how parents and pupils can make a complaint about a breach of the APPs and how the complaint will be handled.

10. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. [It may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose.] We will not disclose your personal information to third parties for their own marketing purposes without your consent.

11. On occasions information such as academic and sporting achievements, pupil activities and similar news is published in School newsletters and magazines, on our intranet [and on our website]. this may include photographs and videos of pupil activities such as sporting events, school camps and school excursions. The School will obtain permissions annually from the pupil's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet.

12. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why.

## **APPENIDX 4**

### **Employment Application Collection Notice**

1. In applying for this position you will be providing Enkindle Village School with personal information. We can be contacted at PO BOX 17, James Cook Drive, James Cook University, 4811; ph: 07 4448 3945; or email [bdm@enkindleschool.qld.edu.au](mailto:bdm@enkindleschool.qld.edu.au).
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted.
5. We are required to conduct a criminal record check; collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect other personal information about you in accordance with these laws.
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.

## **APPENIDX 5**

### **Contractor / Volunteer Collection Notice**

1. In offering, applying or agreeing to provide services to the School, you will be providing Enkindle Village School with personal information. We can be contacted at PO BOX 17, James Cook Drive, James Cook University, 4811; ph: 07 4448 3945; or email [bdm@enkindleschool.qld.edu.au](mailto:bdm@enkindleschool.qld.edu.au).

2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.

3. You agree that we may store this information for two years.

4. The School's Privacy Policy, accessible on the School's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.

5. We will not disclose this information to a third party without your consent unless otherwise permitted to.

6. We are required to conduct a criminal record check; collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect other personal information about you in accordance with these laws.

7. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications.

Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia.

Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.

8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why.