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Version	Date	Nature of Amendment
1	2008	MSSA Confidentiality Policy
2	2010	MSSA Privacy Policy MSS Confidentiality Guidelines Collection of Confidential Information Sheet
3	2014	Merged Privacy Policy with Confidentiality Guidelines. Information sheet made obsolete as link to policy available on website.
4	16.4.2021	

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DEFINITIONS AND ABBREVIATIONS

MSSA: Milkwood Steiner School Association

Personal information – The definition of personal information can be found at section 4A of the *Information Act*.

Personal information includes "information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion."

Sensitive information - The definition of sensitive information can be found at section 4 of the *Information Act*. Sensitive information, includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual.

Express consent is permission for something that is given specifically, either verbally or in writing.

Implied consent is consent not expressly granted by a person, but rather implicitly granted by a person's actions and the facts and circumstances of a particular situation.

PURPOSE

The school value of *dignity* guides this Privacy Policy. This policy exists as a commitment to maintaining the dignity of its members, staff, students and visitors, through the safeguarding of their personal information.

SCOPE

This document applies to all areas of the school, including the Milkwood Steiner School Association Board (the Board), staff, students, Playgroup, After School Care, families, carers and friends of MSSA, volunteers and visitors to the school.

This policy applies in all interactions while in school or off site.

POLICY STATEMENT

Collection

MSSA only collects personal and sensitive information necessary for or related to its activities and functions and only by fair and lawful means. MSSA functions include:

- Teaching and learning
- Supporting students' health, social and emotional wellbeing
- Fulfilling legal requirements including but not limited to duty of care, prevention of harm and anti-discrimination
- Providing a safe and secure workplace
- Communicating with members, students and stakeholders effectively
- Celebrating the efforts and achievements of students and staff
- Maintaining the good order and management of Milkwood Steiner School, including effective resourcing and administration of MSSA
- Fulfilling statutory duties
- Planning, funding, monitoring, regulating and evaluating policies and services.
- Complying with reporting requirements
- Investigating incidents and responding to the Department of Education's direction

The information collected by MSSA is used for direct service provision, or statistical, research, marketing, planning and reporting purposes aligned with the functions of the school.

Where possible, personal information is de-identified before reuse.

MSSA may collect personal information via:

- enrolment forms and other forms used to facilitate delivery of departmental services to you;
- through written correspondence or orally, such as when you write a letter or telephone the school; and/or
- employment forms
- in person and over the phone: from students and their family, staff, volunteers, visitors, job applicants and others
- from electronic and paper documentation: including job applications, emails, invoices, enrolment forms, letters to our school, consent forms (for example: enrolment, excursion, Student Support Services consent forms), our school's website or school-controlled social media
- through online tools: such as apps and other software used by our school
- through security systems located at our school
- through reasonable tools for documenting relevant student information at school (eg. photography and anecdotal records of students).

Unsolicited Information

MSSA may receive information about individuals that the school has taken no active steps to collect. If permitted or required by law, MSSA may keep records of this information. If not, this information is destroyed or de-identified when practicable, lawful and reasonable to do so.

Student Transfers

When a student has been accepted at, and is transferring to, another Northern Territory school or educational facility, MSSA may transfer information about the student to that school. This may include copies of the student's school records, including any behaviour and health information and other records.

MSSA may also request these records from a student's previous school upon enrolment request or while enrolled.

This enables practice enables schools to provide for the education of the student and to support the student's social and emotional wellbeing and health.

Consent

MSSA considers an individual to have consented to the reasonable collection, use or disclosure of their information if the individual has become a member, employee or student of Milkwood Steiner School, or provided express consent or consent can be reasonably inferred from the conduct of the individual concerned.

Consent by and on behalf of children

Children can give consent to the collection, use and disclosure of their personal information where it is established that they are of sufficient understanding and maturity to do so or are living independently in accordance with the NT *Education Act*. Consent can also be given on behalf of a child, by the child's parent or a person authorised to do so. Proof of authorisation must be provided in writing.

Consent on behalf of a person who has a disability

Consent can be given on behalf of a person who has a disability, by a person authorised to do so, such as their legal guardian.

Consent on behalf of deceased persons

Consent can be given on behalf of deceased persons, within the first five years after death, by the administrator or executor of the deceased person's estate, or a person authorised to do so, such as their next of kin.

ROLES AND RESPONSIBILITIES

MSSA Board, Staff, Volunteers, Visitors, Contractors, Members and Students are responsible for abiding by the policy in line with current legislation, and accept this policy upon becoming members, employees and students of Milkwood Steiner School.

The Principal is responsible for ensuring the policy meets current legislation requirements, and implementing this policy into operational practice.

MSSA Board and Staff are required to

- collect only that information which is needed for a particular purpose ('the primary purpose');
- collect sensitive information from the person concerned wherever possible and with their consent;
- take reasonable steps to let the person concerned know why information about them is being collected
- use and disclose personal information only for the primary purpose, or for another purpose (a 'secondary purpose') which is directly related to the primary purpose and one which the person would reasonably expect;
- take all reasonable steps to ensure the information they collect is stored securely,
- protecting it from unauthorised access, modification or disclosure;
- take reasonable measures to ensure the information it collects is accurate, complete and up-to-date;
- provide the person concerned with access to information;
- ensure they are aware of the Information Privacy Principles and their obligations under the *Information Act* in regards to the collection, use and disclosure of personal and sensitive information
- maintain confidentiality about professional discussions