

PRIVACY POLICY 2025

Forming part of: Giant Steps Tasmania's *Health & Safety Manual*

Policy Statement

Giant Steps Tasmania is bound by the Privacy Act 1988 and the Australian Privacy Principles (APPs) contained in the Personal Information Protection Act 2004. The 13 Privacy Principles are as follows:

Principle	Title	Purpose
APP1	Open and transparent management of personal information	Ensures that APP entities manage personal in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy .
APP2	Anonymity and pseudonymity	Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.
APP3	Collection of solicited personal information	Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of sensitive information.
APP4	Dealing with unsolicited personal information	Outlines how APP entities must deal with unsolicited personal information.
APP5	Notification of the collection of personal information	Outlines when and in what circumstances an APP entity that collects personal information must tell an individual about certain matters.
APP6	Use or disclosure of personal information	Outlines the circumstances in which an APP entity may use or disclose personal
APP7	Direct Marketing	An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.
APP8	Cross-border disclosure of personal information	Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.
APP9	Adoption, use or disclosure of government related identifiers	Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier
APP10	Quality of personal information	An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the information.
APP11	Security of personal information	An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.
APP12	Access to personal information	Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.
APP13	Correction of personal information	Outlines an APP entity's obligations in relation to correcting the personal information

As Giant Steps Tasmania (as of May 2025) has a turnover of more than \$3 million a year, it has additional responsibilities under the Privacy Act and is subject to **The Privacy Amendment (Notifiable Data Breaches (NBD)) Act 2017**.

These responsibilities are as follows:

- Under the Notifiable Data Breaches (NDB) scheme any organisation or agency the Privacy Act 1988 covers must notify affected individuals and the Office of the Australian Information Commissioner (OAIC) when a data breach is likely to result in serious harm to an individual whose personal information is involved.
- A data breach occurs when personal information an organisation holds is lost or subjected to unauthorised access or disclosure. For example, when:
 - a device with a customer's personal information is lost or stolen
 - a database with personal information is hacked
 - personal information is mistakenly given to the wrong person
- The notification to individuals must include recommendations about the steps they should take in response to the data breach. The organisation must also notify the OAIC using the online Notifiable Data Breach form.

The school has always taken the security of the data (both general and sensitive) it holds on students, parents/ carers, staff and volunteers very seriously. Paper records are held in lockable filing cabinets and electronic records are password protected.

Giant Steps Tasmania regularly reviews and updates its Privacy Policy to take account of new laws and technology, changes to the schools' operations and practices and to make sure it remains appropriate to the changing school environment.

Purpose

This Privacy Policy sets out how Giant Steps Tasmania manages personal information provided to or collected by the organisation. Giant Steps Tasmania uses The Information Lifecycle Model described by the Office of the Australian Information Commissioner in its Guide to Securing Personal Information:

The information lifecycle

- 1 Considering whether it is actually necessary to collect and hold personal information in order to carry out business functions or activities
- 2 Planning how personal information will be handled by embedding privacy protections into the design of information handling practices
- 3 Assessing the risks associated with the collection of the personal information due to a new act, practice, change to an existing project or as part of business as usual
- 4 Taking appropriate steps and putting into place strategies to protect personal information held
- 5 Destroying or de-identifying the personal information when it is no longer needed.

Definitions

Giant Steps Tasmania adheres to the Office of the Australian Information Commissioner's (OAIC) understanding of Sensitive Information as being a subset of personal information and is defined as:

- “information or an opinion (that is also personal information) about an individual’s:
 - racial or ethnic origin
 - political opinions
 - membership of a political association
 - religious beliefs or affiliations
 - philosophical beliefs
 - membership of a professional or trade association
 - membership of a trade union
 - gender identity, sexual orientation or practices, or
 - criminal record
- health information about an individual
- genetic information (that is not otherwise health information)
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or
- biometric templates”

Sensitive information is generally afforded a higher level of privacy protection under the Australian Privacy Principles (APPs) than other personal information in recognition of the fact that inappropriate handling of sensitive information can have adverse consequences for an individual or those associated with the individual.

In addition, Giant Steps Tasmania conforms to the current (as of May 2025) disposal freeze on records relating to children issued by the Office of the State Archivist. Giant Steps Tasmania will therefore keep all records relating to students, the services provided to them and the employees who provide and have provided those services until at least 2029.

<https://www.informationstrategy.tas.gov.au/Resources/Documents/Disposal%20freeze%20for%20records%20relating%20to%20children%20-%20RCIRCSA%20toolkit.pdf>

Implementation

Giant Steps Tasmania carefully considers the kinds of personal information it collects, how it collects it, how it uses it and how it maintains the security of this information:

about pupils and parents and/or guardians before, during and after the course of a pupil's enrolment at the school including:

- name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
- parents'/ carers' education, occupation and language background;
- medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
- behaviour notes, and school reports;
- information about referrals to government welfare agencies;
- counselling reports;
- health fund details and Medicare number;
- any court orders;
- photos and videos at school events.

about job applicants, staff members, volunteers and contractors, including:

- name, contact details (including next of kin), date of birth, and religion;

- information on job application;
- professional development history;
- salary and payment information, including superannuation details;
- medical 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;
- work emails and private emails (when using work email address) and Internet browsing history.

about other people who come into contact with the school, including:

- name and contact details and
- any other information necessary for the particular contact with the school.

Personal Information individuals provide: Giant Steps Tasmania may collect personal information held about an individual by way of forms filled out by parents/ carers, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and pupils provide personal information.

Personal Information provided by other people: In some circumstances Giant Steps Tasmania may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.

How Giant Steps Tasmania uses the personal information provided

The school uses the personal information it collects for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which parents/ carers have consented.

Pupils and Parents/ Carers: In relation to personal information of pupils and parents/ carers, the school's primary purpose of collection is to enable Giant Steps Tasmania to provide schooling to enrolled pupils, 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. This includes satisfying the needs of Parents, the needs of the pupil and the needs of the school throughout the whole period the pupil is enrolled at the school.

The purposes for which Giant Steps Tasmania uses personal information of pupils and parents/ carers include:

- to keep parents/ carers informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after pupils' educational, social, emotional and medical wellbeing;
- seeking donations and marketing for the school; and
- to satisfy Giant Steps Tasmania's legal obligations and allow the school to discharge its duty of care.

In some cases where Giant Steps Tasmania requests personal information about a pupil or parent/ carer, if the information requested is not obtained, the school may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity or provide an alternative activity.

Job applicants and contractors: In relation to personal information of job applicants and contractors, Giant Steps Tasmania's primary purpose of collection is to assess and (if the individual is successful) to engage the applicant or contractor.

The purposes for which Giant Steps Tasmania uses personal information of job applicants and contractors include:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for the school; and
- satisfying the school's legal obligations, for example, in relation to child protection legislation.

Volunteers: The school also obtains personal information about volunteers who assist the school in its functions or conduct associated activities to enable the school and the volunteers to work together.

Marketing and fundraising: Giant Steps Tasmania treats marketing and seeking donations for the future growth and development of the school as an important part of ensuring that the school continues to be a quality learning environment in which both pupils and staff thrive. Personal information held by a school may be disclosed to an organisation that assists in the school's fundraising. Parents/ Carers, staff, contractors and other members of the wider school community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes with permission.

Who the school discloses personal information to and who it stores information with

Giant Steps Tasmania may disclose personal information, including sensitive information, held about an individual 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;
- recipients of school publications, such as newsletters and magazines;
- pupils' parents or guardians;
- anyone parents/ carers authorise the school to disclose information to; and
- anyone to whom the school is required or authorised to disclose the information by law, including child protection services.

Sending and storing information overseas: Giant Steps Tasmania may disclose personal information about an individual to overseas recipients, for instance, to facilitate a student

moving abroad. However, the school will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual or her/ his parent/ carer (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Giant Steps Tasmania 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 who access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia. An example of such a cloud service provider is Microsoft 365.

How Giant Steps Tasmania treats sensitive information

In referring to 'sensitive information', the school means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record; health information and biometric information.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the student (or parent/ carer) agrees otherwise, or the use or disclosure of the sensitive information is allowed or required by law.

Management and security of personal information

Giant Steps Tasmania's staff are required to respect the confidentiality of pupils' and parents'/ carers' personal information and the privacy of individuals.

The school has in place steps to protect the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure by the use of various methods including locked storage of paper records and password access rights to computerised records.

Access and correction of personal information

Under the Commonwealth Privacy Act an individual has the right to seek and obtain access to any personal information which the school holds about them and to advise the school of any perceived inaccuracy.

Pupils will generally be able to access and update their personal information through their parents/ carers, but older pupils may seek access and correction themselves.

If a parent/ carer wishes to make a request to access or to update any personal information the school holds on them or their child, they should contact the Principal by telephone or in writing.

Consent and rights of access to the personal information of pupils

Giant Steps Tasmania respects every parent's/ carer's right to make decisions concerning their child's education. The school will refer any requests for consents and notices in relation to the personal information of a pupil to the pupil's parent/ carer. A school will treat consent given by a parent/ carer as consent given on behalf of the pupil, and notice to parents/ carers will act as notice given to the pupil. Parents/ Carers may seek access to personal information held by the

school about them or their child by contacting the Principal by telephone or in writing. However, there may be occasions when access is 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 the school's duty of care to the pupil.

Enquiries and complaints

If an individual would like further information about the way Giant Steps Tasmania manages the personal information it holds on them, or wishes to make a complaint that the school has breached the Australian Privacy Principles, or **The Privacy Amendment (Notifiable Data Breaches (NBD)) Act 2017**, they should in the first instance contact the Principal:

By email: principal@giantsteps.tas.edu.au

In writing: PO Box 300, Deloraine, Tasmania 7304

By phone: (03) 6362 2522.

The school, with the involvement of the Board, will investigate any complaint and will notify the complainant of a decision as soon as is practicable. (Please see also: **Complaints Policy** and Procedure).

If the individual is not satisfied with the response, they may contact the Ombudsman:

By email: ombudsman@ombudsman.tas.gov.au

By phone: 1800 001 170

Authorised by:	Mr. Paul Bowman
Position:	Chair of Board
Signature:	
Date:	
Original policy prepared by:	Chris Jacobsen
Position:	(Previously) Education Administrator
Date of last review:	April, 2023
Review prepared by:	Chris Jacobsen (Fairlight Educational Consulting)
Staff Consultation period:	May 2025
Date for next review:	May, 2027

The attached sheets regarding the personal information held by Giant Steps on Students, Parents/ Carers and Employees/ Volunteers are regularly reviewed and updated.

The Fair Work Ombudsman requires that employee records must be kept for 7 years. The Australian Tax Office (ATO) requires that employee financial records must be kept for 5 years. All records relating to students, staff and the services provided to students both on paper and electronically will be kept until 2029, or as may be determined by the Office of the State Archivist.

PERSONAL INFORMATION - Student

Summary of personal info	Needed for function or activity of school	From whom info is collected	Where recorded	Who can access	How long kept	Level of risk to individual of unintentional disclosure*
		PA = parent/ carer PU = pupil SM =staff member HP = Health Professional OTH = Other (specify)	P = Paper file E = Electronically	PR = Principal LS = Limited staff AS = All staff		H = High M = Medium L = Low
Name	✓	PA	P and E	AS	Until 2029	M
Address	✓	PA	P and E	AS	Until 2029	M
Phone number(s)	✓	PA	P and E	AS	Until 2029	M
Date of birth (& age)	✓	PA	P and E	AS	Until 2029	M
Birth certificate	✓	PA	P and E	LS	Until 2029	M
Emergency contact	✓	PA	P and E	AS	Until 2029	L
Names of doctors	✓	PA	P and E	AS	Until 2029	L
School reports	✓	SM	P and E	AS	Until 2029	M
Assessments	✓	PA/ GP/ Psych/ Therapists	P and E	LS	Until 2029	M
Referrals	✓	PA/ GP/ Psych/ Therapists	P	LS	Until 2029	M

Details of disability	✓	PA/ GP/ Psych/ Therapists	P and E	AS	Until 2029	M
Court Orders	✓	PA/ Family Court	P	LS	Until 2029	M
Behaviour notes	✓	PA/ SM	P and E	LS	Until 2029	M
Previous school	✓	PA/ Previous school	P and E	LS	Until 2029	L
Health fund details	✓	PA	P and E	LS	Until 2029	M
Medicare number	✓	PA	P and E	LS	Until 2029	M
Medical reports	✓	PA/ GP	P and E	LS	Until 2029	M
Absence notes	✓	PA	P and E	LS	Until 2029	L
Case management notes Inc. Mandated Reporting	✓	PA/ Social Services/OER	P and E	LS	Until 2029	M
Photos, videos	✓	PA/ SM	E	AS	Until 2029	M

★ The Level of Risk is for the unintentional disclosure of individual items of information. Where multiple items are disclosed (e.g. name, address and photos, the level of risk for the individual could be considerably higher.

PERSONAL INFORMATION - Parent/ Carer

Summary of personal info	Needed for function or activity of school	From whom info is collected	Where recorded	Who can access	How long kept	Level of risk to individual of unintentional disclosure
		PA = parent/ carer PU = pupil SM =staff member HP = Health Professional OTH = Other (specify)	P = Paper file E = Electronically	PR = Principal LS = Limited staff AS = All staff		H = High M = Medium L = Low
Name	✓	PA	P and E	AS	Until 2029	L
Address	✓	PA	P and E	LS	Until 2029	L
Phone number(s)	✓	PA	P and E	LS	Until 2029	L
Date of birth (& age)	✓	PA	P and E	LS	Until 2029	L
Languages spoken	✓	PA	P and E	LS	Until 2029	L
Religion	✓	PA	P and E	LS	Until 2029	L
Social/ Economic Status	✓	PA	P and E	LS	Until 2029	M
Court Orders	✓	PA/ Family Court	P and E	LS	Until 2029	M
Communication with school/ staff	✓	PA	P and E	LS	Until 2029	L
Health fund details	✓	PA	P and E	LS	Until 2029	L

Medicare number	✓	PA	P and E	LS	Until 2029	L
Centrelink information	✓	PA/ Centrelink	P and E	LS	Until 2029	M
Rebate information	✓	PA	P and E	LS	Until 2029	L
Unsolicited information	✗	PA	P and E	PR/ LS/ AS	Until 2029	L-H

PERSONAL INFORMATION – Employee

Summary of personal info	Needed for function or activity of school	From whom info is collected	Where recorded	Who can access	How long kept	Level of risk to individual of unintentional disclosure
		PA = parent/ carer PU = pupil SM =staff member HP = Health Professional OTH = Other (specify)	P = Paper file E = Electronically	PR = Principal LS = Limited staff AS = All staff		H = High M = Medium L = Low
Name	✓	SM	P and E	AS	Until 2029	L
Address	✓	SM	P and E	LS	Until 2029	L
Phone number(s)	✓	SM	P and E	LS	Until 2029	L
Date of birth (& age)	✓	SM	P and/ E	LS	Until 2029	L
Next of kin	✓	SM	P and E	LS	Until 2029	L
Emergency contact numbers	✓	SM	P and E	LS	Until 2029	L
Names of doctors	✓	SM	P and E	LS	Until 2029	L
Job application	✓	SM	P and/or E	LS	Until 2029	L
Employment history	✓	SM	P and/or E	LS	Until 2029	L
Professional development history	✓	SM+Principal	P and E	LS	Until 2029	L

Appraisal information	✓	SM+Principal	P and E	LS	Until 2029	M
Details of disability	✓	SM	P and E	LS	Until 2029	M
Bank details	✓	SM	P and E	LS	Until 2029	M
Pay advices	✓	SM	P and E	LS	Until 2029	M
Superannuation details	✓	SM	P and E	LS	Until 2029	M
Complaint records	✓	SM+Principal	P and E	PR	Until 2029	M
Communication with parents/carers	✓	SM+PA	P and E	LS	Until 2029	L
Referee names, contact numbers	✓	SM	P and E	LS	Until 2029	L
Role description	✓	School Admin	P and E	LS	Until 2029	L
Leave details	✓	School Admin	P and E	LS	Until 2029	L
Medical certificates	✓	SM	P and E	LS	Until 2029	L
Employment information	✓	SM	P and/or E	LS	Until 2029	L
Workplace emails	✓	SM+School Admin	E	LS	Until 2029	L
Worksafe injury claims inc. Notifiable incidents	✓	SM+School Admin+WorkSafe	P and E	LS	Until 2029	M