1. **Scope**  
This policy applies to members of school staff and the school council at Nossal High School. This policy will be made available on request, and published on the school website.

2. **Authorisation**  
This policy was adopted at the Nossal High School Council meeting on

3. **Review Date**  
This policy shall be reviewed in April 2015 and updated as required.

4. **Background**  
All staff of Nossal High School are required by law to protect the personal and health information the School collects and holds.

The Victorian privacy laws, the *Information Privacy Act 2000* and *Health Records Act 2001*, provide for the protection of personal and health information.

The privacy laws do not replace any existing obligations Nossal High School has under other laws. Essentially this policy will apply when other laws do not regulate the use of personal information.

5. **Definitions**  
**Personal information** means information or opinion that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can be reasonable be determined from the information or opinion. For example this includes all paper and electronic records, photographs and video recordings.

**Health information** is defined as including information or opinion about a person’s physical, mental or psychological health, or disability, which is also classified as personal information. This includes information or opinion about a person’s health status and medical history, whether recorded or not.

**Sensitive information** is defined as 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 classified as personal information about an individual.

In this policy **personal information** refers to personal information, health information and sensitive information unless otherwise specified.

**Parent** in this policy in relation to a child, includes step parent, an adoptive parent, a foster parent, guardian, or a person who has custody or daily care and control of the child.

**Staff** in this policy is defined as someone who carries out a duty on behalf of the School, paid or unpaid, or who is contracted to, or directly employed by the School or the Department of Education and Early Childhood Development (DEECD). Information provided to a School through job applications is also considered staff information.
6. Policy Context

**Personal Information is collected and used by Nossal High School to:**
- provide services or to carry out the School statutory functions,
- assist the School services and its staff to fulfil its duty of care to students,
- plan, resource, monitor and evaluate School services and functions,
- comply with DEECD reporting requirements,
- comply with statutory and or other legal obligations in respect of staff,
- investigate incidents or defend any legal claims against the School, its services or its staff, and
- comply with laws that impose specific obligations regarding the handling of personal information.

Collection of Personal Information

The School collects and holds personal information about students, parents and staff.

8. Use and disclosure of the personal information provided

**Students and Parents:**

8.1 **The purposes for which the School uses personal information of students and parents include:**
- keeping parents informed about matters related to their child's schooling,
- looking after students' educational, social and health needs,
- celebrating the efforts and achievements of students,
- day-to-day administration,
- satisfying the School's legal obligations, and
- allowing the School to discharge its duty of care.

**Staff**

8.2 **The purposes for which the School uses personal information of job applicants, staff members and contractors include:**
- assessing the suitability for employment,
- administering the individual's employment or contract,
- for insurance purposes, such as public liability or WorkCover,
- satisfying the School's legal requirements, and
- investigating incidents or defending legal claims about the School, its services or staff.

8.3 **The School will use and disclose personal information about a student, parent and staff when:**
- it is required for general administration duties and statutory functions,
- it relates to the purposes for which it was collected, and
- for a purpose that is directly related to the reason the information was collected and the use would be reasonably expected by the individual and there is no reason to believe they would object to the disclosure.

8.4 **The School can disclose personal information for another purpose when:**
- the person consents, or
- it is necessary to lessen or prevent a serious or imminent threat to life, health or safety or
- is required by law or for law enforcement purposes.

9. Where consent for the use and disclosure of personal information is required, the school will seek consent from the appropriate person. In the case of a student’s personal information, the school will seek the consent from the student and/ or parent depending on the circumstances and the student’s mental ability and maturity to understand the consequences of the proposed use and disclosure.
10. **Accessing personal information**

A parent, student or staff member may seek access to their personal information, provided by them, that is held by the School.

*Access to other information may be restricted according to the requirements of laws that cover the management of school records. These include the Public Records Act and the Freedom of Information Act.*

11. **Updating personal information**

The School aims to keep personal information it holds accurate, complete and up-to-date. A person may update their personal information by contacting the Principal or Business Manager.

12. **Security**

12.1 School staff and students have use of information communication technologies (ICT) provided by the School. This use is directed by:

- [DEECD’s Acceptable Use policy for Internet, email, and other electronic communications.](#)
- [DEECD’s IT Security Policy](#)

12.2 **Web Sites**

**Information Collected:**

Nossal High School web and web server does not record visitor data; website visitor data (IP addresses) is collected through Google Analytics to determine visitor frequency.

13. **Complaints under Privacy**

Should the school receive a complaint about personal information privacy this will be investigated in accordance with [DEECD’s Privacy Complaints Handling Policy](#).

14. **Note re Biometric Finger Scanning**

**Purpose:**

To ensure the most up to date and accurate system Nossal High School has been using a biometric finger scanning process to enhance our attendance system. The biometric scanner does not register a fingerprint, rather it constructs a unique algorithm (a “hashed feature extract”) for each student scanning their finger. Although the computer software uses the fingerprint for personal identification, it does not store a copy of the fingerprint. The template is digitised and encrypted and we are unable to, and it is unlikely that a fingerprint can then be reverse engineered, reconstructed, replicated or delivered to any party from this template. The biometric scanner is used only to facilitate late arrival and early leave passes for students as it provides a fast, accurate and efficient means of monitoring and recording attendance, and parents and students are required to complete an “opt in” agreement to access this facility. Once the finger scan has been recorded and entered into the attendance system, students simply need to swipe their finger on the screen to access an individual sign in/sign out screen that will record their absence or late arrival directly to the attendance monitoring system, and print a personalised leave pass for them to use. In the event of a late train this expedites faster and more efficient sign in and more accurate attendance rolls; ensures that SMS attendance alerts for parents are more accurate; and attendance rolls are up to date in event of an evacuation or other such event where we may need to locate specific students quickly. Should students not wish to use the biometric system, a personal ID card reader is available, or passes can be manually generated by the office staff or attendance officer.

**Protection of Biometric Data:**

The finger scanning data is collected at Nossal through the “Compass” attendance system (kiosk interface) administered by JDLF International who adhere to the provisions of the Information Privacy Act. The data may be encrypted and partitioned and is stored across a private cloud/mesh network in Victoria. A copy of the user’s fingerprint is not stored, and there is no further processing of the biometric data. More detailed information about the storage and security measures employed by JDLF is available at [www.jdlf.com.au/policy/privacy](http://www.jdlf.com.au/policy/privacy)
**Destruction of Biometric Data:**
Upon request from the student/parent, or one month after exit or withdrawal from the school, biometric data is removed from all devices. Due to the difficulty in permanently deleting digitally stored data, data storage devices are securely housed and physically destroyed at the end of their life rendering any information permanently inaccessible. A range of de-identification techniques may also be employed by JDLF to ensure that stored data cannot be linked to an individual.

**Access to Data:**
All data collected remains the property of the information owner, and can be supplied upon request, but as the biometric data we store cannot be provided in a human readable format, owner requests for copies of this data cannot be provided.

**Openness:**
The school is conscious of the huge amount of electronic data and personal information it collects and stores, and of some of the system weaknesses in gathering, storing, accessing and removing this data. We make every effort to ensure that our structures, systems and procedures are compliant with the Information Privacy Principles and associated legislation, and that all members of our school community are protected by, and informed about the implementation of new systems and the changes that will inevitably arise.

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**EVALUATION**

This policy will be reviewed annually or more often if necessary due to changes in regulations or circumstance

| Date Implemented | May 2013 |
| Author           | Roger Page |
| Approved By      | School Council |
| Approval Authority (Signature & Date) | |
| Date Reviewed    | |
| Responsible for Review | Principal |
| Review Date      | April 2014 |
| References       | https://edugate.eduweb.vic.gov.au/Services/privacy/Pages |