



PRIVACY POLICY

August 2018

1.0 Introduction

The Privacy Policy sets out how the School manages personal information provided to or collected by it.

The School is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988. In relation to health records, the School is also bound by the *Health Records Act 2001 (Vic.)* and the Health Privacy Principles in that Act.

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

2.0 What kinds of personal information does the School collect and how does the School collect it?

The School collects and holds personal information, including health and other sensitive information, about:

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the School, which may include:
 - name, contact details (including next of kin), date of birth, gender language background, previous school and religion
 - parents' education, occupation and language background
 - medical information (e.g. details of disability and/or allergies, and details of any assistance the student receives in relation to those disabilities, medical reports, names of doctors)
 - information about referrals to government welfare agencies
 - counselling reports
 - health fund details and Medicare number
 - any court orders
 - volunteering information (including Working With Children Checks)

- 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
 - work emails and private emails (when using work email address) and internet browsing history
 - other people who come into contact with the School.

2.1 Personal Information you provide:

The School will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, emails, telephone calls and online. On occasions people other than parents and students (such as job applicants and contractors) provide personal information to the School.

2.2 Personal Information provided by other people:

In some circumstances the School may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a report from a school.

2.3 Exception in relation to employee records:

Under the *Privacy Act*, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the School's treatment of an employee record where the treatment is directly related to a current or former employment relationship between the School and employee.

3.0 How will the School use the personal information you provide?

The School will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

3.1 Students and Parents:

In relation to personal information of students and Parents, the School's primary purpose of collection is to enable the School to support students enrolled in the school (including educational and support services for the student), exercise its duty of care and perform necessary associated administrative activities which will enable students to take part in all school activities. This includes satisfying the needs of parents, the needs of the student and the needs of the School throughout the whole period the student is enrolled.

The purpose for which the School uses personal information of students and parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters, School App and CareMonkey platform for online permission forms,
- day-to-day administration of the School;
- looking after student's educational, social and medical wellbeing.

3.2 Job applicants and contractors:

In relation to personal information of job applicants and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant, or contractor, as the case may be.

The purposes for which the School 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 donations and marketing in the CEO
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

3.3 Volunteers:

The School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as to enable the School and the volunteers to work together, to confirm their suitability and to work together.

4.0 Who might the School disclose personal information to and store your information with?

The School may disclose personal information, including sensitive information, held about an individual for **educational, administrative and support purposes**. This may include to:

- CEO service providers which provide educational, support and health services to the School, including the Catholic Education Commission of Victoria Ltd (CECV), specialist visiting teachers, volunteers, counsellors, and providers of learning and assessment tools
- third party service providers that provide online educational and assessment support services, document and data management services, or applications to schools and school systems including the Integrated Catholic Online Network (ICON) and Google's G Suite, including Gmail and, where necessary, to support the training of selected staff in the use of these services
- health service providers
- recipients of School publications, such as newsletters and magazines
- student's parents or guardians and their emergency contacts
- assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority
- anyone you authorise the School to disclose information to
- anyone who we are required or authorised to disclose the information to by law, including child protection laws.

4.1 Sending and storing information overseas:

The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a student exchange student. However, the School will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual; or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

4.2 How does the School treat 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, that is also personal information; health information and biometric information about an individual.

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

5.0 Management and security of personal information

The School staff are required to respect the confidentiality of individual's personal information and the privacy of individuals.

The School has in place steps to protect the personal information the School holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records. This includes responding to any incidents which may affect the security of the personal information it holds. Our School uses CareMonkey which is a secure site, designed with privacy and security to keep school data safe. Please refer to website. To view CareMonkey security practices please go to <https://www.caremonkey.com/security-practices/>.

It is recommended that all persons adopt secure practices to protect themselves. You should ensure that all passwords you use are strong and regularly updated and that your log in details are kept secure. Do not share your personal information with anyone without first verifying their identity and organisation. If you believe any of your personal information has been compromised, please let the School know immediately.

6.0 Access and correction of personal information

Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information and health records respectively which the School holds about them and to advise the School of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

There are some exceptions to the access rights set out in the applicable legislation.

To make a request to access or to update any personal information the School holds about you or your child, please contact the Principal in writing. The School may require you to verify your identity and specify what information you require. The School may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the School will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

7.0 Consent and rights of access to the personal information of students

The School respects every Parent's right to make decisions concerning their child's education.

Generally, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. The School will treat consent given by Parents as consent given on behalf of the student, and notice to Parents will act as notice given to the student.

Parents may seek access to personal information held by the School about them or their child by contacting the Principal 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 student.

The School may, at its discretion, on the request of a student grant that student access to information held by the School about them, or allow a student to give or withhold consent to the use of their personal information, independently of their Parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

8.0 Enquiries and complaints and contact details

If you would like further information about the way the School manages the personal information it holds about you, or wish to complain that you believe that the School has breached its privacy obligations, please contact the Principal in writing. The School will investigate your complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

Policy Revised: August 2018

Due to Review: August 2021