

## ***PRIVACY POLICY***

[Note: Herein Ursula Frayne Catholic College is referred to as “the School”.]

### ***Rationale***

A Privacy Policy is needed to inform individuals about the practices of the School in relation to personal information. It also serves as a guide to the School’s staff as to the standards to be applied in respect of handling personal information and ensure consistency in the School’s approach to privacy.

The following Privacy Policy is intended for the School to satisfy the requirements of NPP 5, dealing with openness.

The Policy is to be used, in conjunction with the collection notices, to satisfy the requirements in NPPs 1.3 and 1.5 to ensure that individuals are aware of relevant matters on collection of personal information.

### ***Your Privacy is Important***

This statement outlines the School’s policy on how it uses and manages personal information provided to or collected by it.

The School is bound by the National Privacy Principles contained in the Commonwealth Privacy Act 1988

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’s operations and practices and to make sure it remains appropriate to the changing School environment.

### ***Principles and Procedures***

#### **What kind of personal information does the School collect and how does the School collect it?**

The type of information the School collects and holds includes (but is not limited to) personal information, including sensitive information about:

- pupils and parents and/or guardians (‘Parents’) before, during and after the course of a pupil’s enrolment at the School;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the School.

**Personal Information you provide:** The School will generally collect personal information held about an individual by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, and telephone calls. On occasions people other than Parents and pupils provide personal information.

**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 reference from another School.

**Exception in relation to employee records:** Under the Privacy Act the National 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 current or former employment relationship between the School and employee.

**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, or to which you have consented.

**Pupils and Parents:** In relation to the personal information of pupils and Parents include:

- keeping Parents informed about matters related to their child's Schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after pupils' educational, social and medical wellbeing;
- seeking donations and marketing for the School; and
- to satisfy the School's legal obligations and allow the School to discharge its duty of care.
- In some cases where the School requests personal information about a pupil or Parent, if the information requested is not obtained, the School may not be able to enrol or continue the enrolment of the pupil.

**Job Applicants, Staff Members and Contractors:** In relation to personal information of job applicants, staff members and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the School uses personal information of job applicants, staff members and contractors include:

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

**Volunteers:** The School also obtains information about volunteers who assist the School in its functions or conduct associated activities, such as (Alumni Associations), to enable the School and the volunteers to work together.

**Marketing and Fundraising:** The School 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 the School may be disclosed to an organisation that assists in the School's fundraising, for example, the School's Foundation or Alumni organisation.

Parents, staff, contactors 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.

**Who might the School disclose personal information to?**

The School may disclose personal information, including sensitive information, held about an individual to:

- another School;
- government departments;
- medical practitioners;
- people providing services to the School, including specialist visiting teachers and sports coaches;
- recipients of School publications, like newsletters and magazines;
- Parents; and
- anyone you authorise the School to disclose information to.

**Sending Information Overseas:** The School will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the National Privacy Principles.

#### **How does the School treat sensitive information?**

In referring to 'sensitive information', the School means: information relating to the 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.

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

#### **Management and security of personal information**

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

The School has in place steps to protect the personal information the School holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods included locked storage of paper records and pass worded access rights to computerised records.

#### **Updating personal information**

The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the School by contacting the Business Manager's Assistant of the School at any time.

The National Privacy Principles require the School not to store personal information longer than necessary.

#### **You have the right to check what personal information the School holds about you**

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Pupils will generally have access to their personal information through their Parents, but older pupils may seek access themselves.

To make a request to access any information the School holds about you or your child, please contact the School 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.

#### **Consent and rights of access to the personal information of pupils**

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 pupil to the pupil's Parents. The School will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

Parents may seek access to personal information held by the School about them or their child by contacting the School Principal. However, there will 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.

The School may, at its discretion, on the request of a pupil grant that pupil access to information held by the School about them, or allow a pupil 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 pupil and/or the pupil's personal circumstances so warranted.

**Privacy Officer**

The Commonwealth Privacy Act requires that the School appoint a Privacy Officer. The Privacy Officer is Veronica Parker, Vice Principal.

**Enquiries**

If you would like further information about the way the School manages the personal information it holds, please contact the Privacy Officer on (08) 9470 0900.

## **PRIVACY ACT – COLLECTION NOTICES**

1. The College collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a pupil's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to provide schooling to the student and to enable them to take part in all the activities of the College. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
2. Certain laws governing or relating to the operation of Schools require that certain information is collected. These include Public Health, College Education Act 1999 and Child Protection laws, including The Children and Community Services Act 2004.
3. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may ask you to provide medical reports about students from time to time.
4. If we do not obtain the information referred to above we may not be able to enrol or continue the enrolment of your son/daughter.
5. The College from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes to other School, Government departments, Government agencies, statutory boards, the Catholic Education Office, the Catholic Education Commission, your local diocese and the parish and/or Colleges within other Catholic Dioceses. Information is also disclosed to government authorities such as Schools Curriculum and Standards Authority, the Australian Assessment and Reporting Authority (ACARA), medical practitioners, and people providing services to the College, including specialist visiting teachers, [sports] coaches, volunteers and counsellors.
6. In addition to the agencies and purposes cited above personal information relating to students and parents may also be made available, in accordance with Australian Government requirements, to ACARA for the purpose of publishing certain aggregated College information relating to the circumstances of parents and student son the My Schools website.
7. The College may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. Personal information collected from pupils is regularly disclosed to their parents or guardians.
9. Parents may seek access to personal information collected about them and their son/daughter by contacting the College. Pupils may also seek access to personal information about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the pupil, or where pupils have provided information in confidence.
10. The College Privacy Policy also sets out how you may complain about a breach of privacy and how the College will deal with such a complaint.

11. As you may know the College from time to time engages 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 College'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.
12. On occasions information such as academic and sporting achievements, pupil activities and similar news is published, in both hard and digital copy. In College newsletters and magazine on our website.
13. We may include your contact details in a class list and College directory.
14. If you provide the College 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 College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.
15. On Occasions information such as academic and sporting achievements, student activities and similar news is published in College newsletters and magazines and on our website. Photographs of student activities such as sporting events, College camps and College excursions may be taken for publication in College newsletters and magazines and on our intranet. The College will obtain separate permissions from the students' parent or guardian prior to publication if we would like to include photographs or other identifying material in promotional material for the College or otherwise make it available to the public such as on the internet. We may include students' and students' parents' contact details in a class list and College directory.
16. If you provide the College 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 College and why, that they can access that information if they wish and that the College does not usually disclose this information to third parties.