

St Anthony's Catholic Primary School - Privacy Policy

Rationale

This Privacy Policy sets out how St Anthony's Catholic Primary School manages personal information provided to or collected by it.

St Anthony's Catholic Primary School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. In relation to health records, the School is also bound by the *Health Records Act 2001* (Vic.).

St Anthony's Catholic Primary School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the St Anthony's operations and practices and to make sure it remains appropriate to the changing school environment.

What kinds of personal information does St Anthony's Catholic Primary School collect and how does St Anthony's collect it?

The type of information St Anthony's Catholic Primary School collects and holds includes (but is not limited to) 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 including 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), conduct and complaint records, or other behaviour notes, school attendance and school reports, 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), photos and videos at school events.

Personal Information you provide:

St Anthony's Catholic Primary 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, emails and telephone calls. On occasions people other than parents and pupils provide personal information.

Personal Information provided by other people:

In some circumstances St Anthony's Catholic Primary 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. The type of information the School may collect from another school may include:

- academic records and/or achievement levels
- information that may be relevant to assisting the new school meet the needs of the student including any adjustments

Exception in relation to employee records:

Under the Privacy Act and the *Health Records Act 2001* (Vic.), the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to St Anthony's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between St Anthony's Catholic Primary School and employee.

Anonymity:

The School needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate the delivery of schooling to its students and its educational and support services, conduct the job application process and fulfil other obligations and processes. However, in some limited circumstances some activities and interactions with the School may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

How will the St Anthony's Catholic Primary School use the personal information you provide?

St Anthony's Catholic Primary 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.

Pupils and parents:

In relation to personal information of pupils and parents, St Anthony's Catholic Primary School's primary purpose of collection is to enable St Anthony's to provide schooling for the pupil. 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 St Anthony's Catholic Primary School uses personal information of pupils and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of St Anthony's Catholic Primary School;
- looking after pupils' educational, social and medical wellbeing;
- seeking donations and marketing for St Anthony's Catholic Primary School; and
- to satisfy St Anthony's Catholic Primary School's legal obligations and allow St Anthony's Catholic Primary School to discharge its duty of care.

In some cases where St Anthony's Catholic Primary School requests personal information about a pupil or parent, if the information requested is not provided, St Anthony's Catholic Primary 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.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, St Anthony's Catholic Primary 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 St Anthony's Catholic Primary 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 donations and marketing for St Anthony's Catholic Primary School; and
- to satisfy St Anthony's Catholic Primary School legal obligations, for example, in relation to child protection legislation.

Volunteers: St Anthony's Catholic Primary School also obtains personal information about volunteers who assist St Anthony's Catholic Primary School in its functions or conduct associated activities, such as [alumni associations], to enable St Anthony's Catholic Primary School and the volunteers to work together.

Counsellors: The School contracts with external providers to provide counselling services for some students. The Principal may require the Counsellor to inform him or her or other teachers of any issues the Principal and the Counsellor believe may be necessary for the School to know for the well-being or development of the student who is counselled or other students at the School.

Parish: The School may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising.

Marketing and fundraising:

St Anthony's Catholic Primary School treats marketing and seeking donations for the future growth and development of St Anthony's Catholic Primary School as an important part of ensuring that St Anthony's Catholic Primary School continues to provide a quality learning environment in which both pupils and staff thrive. Personal information held by St Anthony's Catholic Primary School may be disclosed to organisations that assist in St Anthony's Catholic Primary School fundraising, for example, St Anthony's Catholic Primary School Foundation or alumni organisation (or, on occasions, external fundraising organisations).

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, such as newsletters and magazines, which include personal information, may be used for marketing purposes.

Who might St Anthony's Catholic Primary School disclose personal information to and store your information with?

St Anthony's Catholic Primary School may disclose personal information, including sensitive information, held about an individual to:

- School service providers which provide educational, support and health services to the School, (either at the School or off campus) including the Catholic Education Commission of Victoria Ltd (CECV), Catholic Education Offices, specialist visiting teachers, volunteers, counsellors, sports coaches 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
- CECV and Catholic Education offices to discharge its responsibilities under the *Australian Education Regulation 2013* (Regulation) and the *Australian Education Act 2013* (Cth) (AE Act) relating to students with a disability.
- other third parties which the school uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with Parents
- another school including to its teachers to facilitate the transfer of a student
- government departments;
- medical practitioners;
- people providing services to St Anthony's Catholic Primary School, including specialist visiting teachers, counsellors and sports coaches;
- recipients of School publications, such as newsletters and magazines;
- Parents;
- anyone you authorise St Anthony's Catholic Primary School to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

Nationally Consistent Collection of Data on School Students with Disability

The school is required by the Federal *Australian Education Regulation (2013)* and *Australian Education Act 2013* (Cth) (AE Act) to collect and disclose certain information under the *Nationally Consistent Collection of Data* (NCCD) on students with a disability. The school provides the required information at an individual student level to the Catholic Education Offices and the CECV, as an approved authority. Approved authorities must comply with reporting, record keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

Sending and storing information overseas:

St Anthony's Catholic Primary School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, St Anthony's Catholic Primary 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 Australian Privacy Principles or other applicable privacy legislation.

The School may from time to time use the services of third party online service providers (including for the delivery of services and third party online applications, or Apps relating to email, instant messaging and education and assessment, such as Google's G Suite, including Gmail) which may be accessible by you. Some personal information [including sensitive information] may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.

School personnel and the school's service providers, and the CECV and its service providers, may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering the system and services ensuring their proper use.

The school makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed and stored outside Australia, in connection with any cloud and third party services and will endeavour to ensure the cloud is located in countries with substantially similar protections as the APPs.

Where personal and sensitive information is retained by a cloud service provider on behalf of CECV to facilitate Human Resources and staff administrative support, this information may be stored on servers located in or outside Australia.

How does St Anthony's Catholic Primary School treat sensitive information?

In referring to 'sensitive information', St Anthony's Catholic Primary 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.

Management and security of personal information

St Anthony's Catholic Primary School staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

St Anthony's Catholic Primary School has in place steps to protect the personal information St Anthony's Catholic Primary 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. If we assess that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, we will notify them and the Office of the Australian Information Commissioner of the breach.

It is recommended that parents and the school community 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.

Access and correction of personal information

Under the Commonwealth Privacy Act and the *Health Records Act 2001* (Vic.), an individual has the right to obtain access to any personal information which St Anthony's Catholic Primary School holds about them and to advise St Anthony's Catholic Primary School of any perceived inaccuracy. Pupils access and update their personal information through their parents.

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

To make a request to access or update any personal information St Anthony's Catholic Primary School holds about you or your child; please contact the School Principal in writing. St Anthony's Catholic Primary School may require you to verify your identity and specify what information you require. St Anthony's Catholic Primary 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, St Anthony's Catholic Primary 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.

Consent and rights of access to the personal information of pupils

St Anthony's Catholic Primary School respects every Parent's right to make decisions concerning their child's education.

Generally, St Anthony's Catholic Primary School will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. St Anthony's Catholic Primary 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 student.

As mentioned above, parents may seek access to personal information held by St Anthony's Catholic Primary 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 student.

Enquiries and complaints

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles please contact the School Principal. The School will investigate any 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.

If you are not satisfied with the School's decision you may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are:

GPO Box 5218, Sydney, NSW 2001

Telephone: 1300 363 992

www.oaic.gov.au

Policy Review

June 2018

This Policy will be reviewed every three years to take account of any changed technology, legislation, expectations or practices.

This policy was implemented in 2018. Next review date: 2021 Person responsible: Principal