



## Privacy Policy

St Mary's Catholic Primary School, Bunbury

The purpose of this policy is to detail how we protect your privacy and how we comply with the requirements of the *Privacy Act*, the thirteen Australian Privacy Principles and the *Health Records and Information Privacy Act 2002*.

The policy describes:

- What kinds of personal information are collected
- Who we collect the information from
- How the information is collected and held
- How we will use the personal information you provide
- Who we may disclose personal information to and for what purpose
- Access and correction of personal information
- How you may enquire about or question our collection of personal information

### What kinds of personal information do we collect?

The kinds of personal information we collect is largely dependent upon the purpose of the collection. Generally, we collect the following:

**Personal Information:** including the names and addresses and other contact details, dates of birth, next of kin, attendance records, sacramental certificates.

**Sensitive Information:** (in relation to student and parent records) including religious denomination, nationality, country of birth, languages spoken at home, family court orders.

**Health Information:** (in relation to student and parent records) including medical records, immunisation details, disabilities, individual health care plans, counselling reports, nutrition and dietary requirements.

### Who do we collect the information from?

This information may be collected from pupils and parents and/or guardians (**Parents**) in relation to a child's enrolment at our school, job applicants, staff members, volunteers and any other people who may come in contact with the school.

Employee records are not covered by the *Australian Privacy Principles* or the *Health Privacy Principles* where they relate to current or former employment relations between the School and the employee.

## **How do we collect and hold your personal information?**

How we collect personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical, we collect personal information directly from you.

Where possible, we attempt to standardise the collection of personal information using specifically designed forms (eg an Enrolment Form). However, given the nature of our operations, we may also receive information by email, letters, notes, telephone and face to face meetings.

We may also collect personal information from other people (e.g. a personal reference, school report from another school).

We store personal information in a variety of formats, including on databases, in hard copy files and on personal devices such as computers, cameras and other recording devices.

The security of your information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on the School databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- Implementing physical security measures around School buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer network.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or similar privacy regime.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

## **How will we use the personal information you provide?**

We will use personal information we collect from you for one or more of our primary functions or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include, but are not limited to:

- Looking after the students' educational, social, spiritual, emotional and health well-being
- Satisfying our duty of care and child protection obligations
- Keeping parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines

- Supporting the activities of our Parents and Friends including the distribution of a parent's contact details on a class contact list
- Day-to-day administration and other relevant administration, including insurance purposes
- Seeking donations and marketing for the school, such as fundraisers
- Administration of an individual's employment or contract

The Privacy Act allows the sharing of personal information between other Catholic Education Office of Western Australia (CEOWA) schools for the purpose for which it was originally collected. An example of when this would occur is when a student transfers from one CEOWA school to another CEOWA school. Accordingly, personal information pertaining to staff personal information may also be transferred under similar conditions.

### **Who may we disclose personal information to and for what purpose?**

A school may disclose personal and sensitive information held about an individual to:

- Another school
- Government departments
- The School's local parish
- Medical practitioners
- People providing services to the school, including specialist visiting teachers, relief teachers, sports coaches
- Parents
- Anyone you authorise the school to disclose information to
- Anyone to whom we are required to disclose the information by law.

We may disclose personal information about an individual to overseas recipients only if:

- The individual's consent has been obtained
- Otherwise compliance with the *Australian Privacy Principles* or other applicable privacy legislation is met

### **How do we access and correct your personal information?**

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis we maintain and update personal information when we are advised by you or when we become aware through other means that the personal information has changed.

You should contact us if any of the details you provide change or if you believe we may hold information about you that is incorrect or incomplete.

In your request to make such changes, we may ask you verify your identity and specify what information you refer to. In some cases, a request in writing to change details may be sought by the school.

**How may you lodge a complaint regarding your personal information?**

If you wish to enquire about or question a possible breach by us of the Australian Privacy Principles or the Health Privacy Principles you may do so by providing your written complaint by email, letter, or by personal delivery to the Principal. You may also make this enquiry verbally.

We will endeavour to respond within a reasonable time and we may seek further information from you in order to provide a full and complete response.