



## Privacy Policy

---

### 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.

### Purpose

The purpose of this policy is to outline the school's use and management of personal information provided to or collected by it as bound by the Australian Privacy Principles contained in the *Privacy Amendment (Enhancing Privacy Legislation) Act 2012 (Commonwealth)*. In relation to health records, the School is also bound by the *Health Records & Information Privacy Act 2001 (Vic)*

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.

### Implementation

#### Information collected

The type of information schools collect and hold includes (but is not limited to) personal information, including sensitive information, about:

- pupils and parents and/or guardians 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 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 unless required by law or organisational policy where the treatment is directly related to a current or former employment relationship between the School and employee. The School handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001 (Vic.)*

#### Anonymity

The school needs to collect identifiable information to facilitate the delivery of educational and support services, the job application process and fulfil other obligations and processes. However, some activities and interactions with the school may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.



## Privacy Policy

---

### **Use of personal information provided**

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 personal information of pupils and Parents, the School's primary purpose of collection is to enable the School to provide schooling for the pupil. This includes satisfying both the needs of Parents and the needs of the pupil throughout the whole period the pupil is enrolled at the School.

The purposes for which the 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;
- looking after pupils' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the school;
- 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:

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

### **Volunteers**

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

Volunteers include; Parents and Friends Association, classroom, library, canteen and excursion helpers. This personal information may also be obtained through a Working With Children Check.



## **Privacy Policy**

---

### **Marketing and fundraising**

Schools treat 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 a School may be disclosed to the Parents' and Friends' Association to assist in the School's fundraising.

Names of students and grades only are to be disclosed.

Parents, staff, contractors 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.

The only personal information to be used in marketing and fundraising is a person's name and their grade.

### **Disclosure of personal information**

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

- School service providers, including the Catholic Education Commission of Victoria, (CECV), Catholic Education Offices specialist visiting teachers, counsellors and sports coaches, and other diocese;
- third party service providers that provide educational support services to schools and school systems such as the Integrated Catholic Online Network system (ICON);
- another school to facilitate the transfer of a student;
- government departments;
- our local parish;
- medical practitioners;
- recipients of School publications, like newsletters and magazines;
- student's parents or guardians;
- anyone you authorise the School to disclose information to, such as, speech therapists, psychologists and counsellors; and
- anyone to whom we are required to disclose the information to by law.

### **Sending information overseas**

The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a School exchange. However, 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 Australian Privacy Principles.

The School may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

### **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 criminal record, that is also personal information; and 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.



## Privacy Policy

---

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

All 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 (see Personal Information Policy) from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and pass-worded access rights to computerised records.

All filing cabinets in classrooms that house student files are to remain locked. Access to the administration office is to be by staff only. Personal records of staff and students are to be accessed by administration personnel only. In areas of the School that the public can access, there is to be no personal information about students displayed that does not have prior consent from parents; for example appropriate medical action plans.

### **Access and correction of personal information**

Under the *Commonwealth Privacy Act* and the *Health Records Act*, an individual has the right to 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. Pupils will generally be able to access and update their personal information through their Parents, but older pupils may seek access and correction themselves.

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

To make a request to access or update any personal information the School holds about you or your child, please contact the School Principal or School Administrator by telephone or 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.

### **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 a school about them or their child by contacting the 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 Policy

---

### 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 by writing or telephone at 496 Princes Highway Narre Warren, 3805. Or on 03 9704 7255. The school email address is [principal@dbnarre.catholic.edu.au](mailto:principal@dbnarre.catholic.edu.au).

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.

### Resources

- Standard Collection Notice
- Employment Collection Notice
- Contract/Volunteer Collection Notice

### Evaluation

Policy reviewed every 5 years as part of the Review cycle or as required.

### Ratification

This policy was last reviewed by Education Board in October 2015



## Privacy Policy

### STANDARD COLLECTION NOTICE

1. The School collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the School. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the School and the Catholic Education Commission of Victoria (CECV) to meet its educational, administrative and duty of care responsibilities to the student to enable them to take part in all the activities of the School.
2. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts and Public Health and Child Protection laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cwth). We may ask you to provide medical reports about students from time to time.
5. The School may disclose personal and sensitive information for administrative, educational and support purposes. This may include to:
  - school service providers such as the Catholic Education Commission of Victoria, Catholic Education Offices, parish, school governing bodies and other dioceses;
  - third party service providers that provide educational support services to schools and school systems such as the Integrated Catholic Online Network (ICON) system;
  - another school to facilitate the transfer of a student;
  - government departments;
  - medical practitioners, and people providing educational, support and health services to the School, including specialist visiting teachers, sports coaches, volunteers and counsellors;
  - anyone you authorise the School to disclose information to; and
  - anyone to whom we are required or authorised to disclose the information to by law.
6. Personal information collected from pupils is regularly disclosed to their parents or guardians.
7. The School also uses 'Google Apps for Education' (GAFE) including Gmail. Through the use of these services, personal information of pupils, parents or guardians may be transferred, stored and processed by Google in the United States, or any other country Google uses to provide these services. School personnel and the Catholic Education Commission of Victoria and their 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 ensuring its proper use.
8. Where personal information is held by GAFE it will be limited and may include:
  - Name
  - Email Address
  - Student Date of BirthPersonal information held by GAFE will be stored in accordance with APPs.



## Privacy Policy

9. Where personal and sensitive information is retained by the CECV by a cloud service provider for educational and administrative purposes, it will be stored on servers located within Australia. This includes the Integrated Catholic Online Network (ICON) system.
10. The School's Privacy Policy is accessible via the school website, handbook or from the school office. The policy sets out how parents, guardians or students may seek access to personal information collected about them. However, there may 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 School's duty of care to the student, or where students have provided information in confidence.
11. The School's Privacy Policy also sets out how parents and students can make a complaint about a breach of the Australian Privacy Principles and how the complaint will be handled.
12. The School may engage 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 School'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.
13. On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. The School will obtain permissions annually from the student's parent or guardian (and from the student if appropriate) prior to publication if we would like to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet.
14. If you provide the School 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 School and why, that they can access that information if they wish and that the School does not usually disclose this information to third parties.



## Privacy Policy

---

### EMPLOYMENT COLLECTION NOTICE

1. In applying for this position you will be providing Don Bosco's Primary School with personal information. We can be contacted at: 496 Princes Highway Narre Warren, 3805. Or on 03 9704 7255. The school email address is [principal@dbnarre.catholic.edu.au](mailto:principal@dbnarre.catholic.edu.au)
1. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
2. Don Bosco's Privacy Policy contains details of how you may complain about a breach of the APPs or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
3. We will not disclose this information to a third party without your consent. We usually disclose this kind of information to the following types of organisations: Don Bosco's Parish Priest and the Catholic Education Office, Diocese of Sale.
4. We are required to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws. This personal information is obtained through a Working With Children Check or Criminal Record Check conducted through VIT registration.
5. Don Bosco's may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
6. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to Don Bosco's and why, that they can access that information if they wish and that Don Bosco's does not usually disclose the information to third parties.



## Privacy Policy

---

### CONTRACT / VOLUNTEER COLLECTION NOTICE

1. In applying to provide services to Don Bosco's, you will be providing Don Bosco's Primary School with personal information. We can be contacted at: 469 Princes Highway Narre Warren, 3805. Or on 03 9704 7255. The school email address is [principal@dbnarre.catholic.edu.au](mailto:principal@dbnarre.catholic.edu.au).
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for up to 12 months.
4. Don Bosco's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the APPs.
5. We will not disclose this information to a third party without your consent. We usually disclose this kind of information to the Catholic Education Office, Diocese of Sale.
6. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect personal information about you in accordance with these laws. This personal information is obtained through a Working With Children Check.
7. Don Bosco's may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to Don Bosco's and why, that they can access that information if they wish and that Don Bosco's does not usually disclose the information to third parties.