



Whitford Catholic Primary School

PRIVACY POLICY

Review: 2017

RATIONALE

The Catholic school is a reflection of the Church's commitment to the dignity of the individual (Mandate para 6). It is important for Whitford Catholic Primary School to demonstrate this commitment in the manner in which we protect information that we hold about our school community. Whitford Catholic Primary School requires information about students and their families in order to provide for the education of these students.

The Privacy Act 1988 directs the manner in which private sector organisations, including Whitford Catholic Primary School, manage the personal and sensitive information of individuals.

The purpose of the legislation is to ensure that organisations, which hold information about individuals, handle that information responsibly. It aims to establish a nationally consistent approach to the management of personal information.

DEFINITIONS

Personal Information is information which can identify an individual.

Sensitive Information is information about a person's religious and political beliefs, sexual preferences, cultural, racial or ethnic origin, membership of political associations, philosophical beliefs, criminal record or health information.

PRINCIPLES

- Schools have a responsibility to use and manage personal and sensitive information collected by them in accordance with the Privacy Act 1988.
- Schools have a responsibility to inform individuals of the purpose of collecting personal and sensitive information.
- All information is collected for the primary purpose of the Catholic education of the student.

PROCEDURES

1. All forms used by Whitford Catholic Primary School to collect personal and sensitive information shall reflect essential information required for the primary purpose of the school.
2. All staff at Whitford Catholic Primary School are appropriately informed in relation to the Privacy Act 1988.
3. The Principal shall ensure that all personal and sensitive information held by the school is properly secured.
4. School based staff are entitled to view and access records on their personnel file.

5. **Purpose**

- 5.1. Whitford Catholic collects personal information, including sensitive information for the primary purpose of enabling it to provide proper schooling for its students, and for such secondary purposes that are related to this primary purpose or to which you have consented.
- 5.2. The purposes for which Whitford 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
 - Caring for pupil's educational, social, spiritual and medical well-being
 - Seeking donations and marketing for the school
 - To satisfy the Catholic Education Office and Whitford Catholic Primary School's legal and insurance obligations and to allow the school to discharge its duty of care
 - Training of staff, planning, research and statistical analysis

In addition the school may collect and use personal information where the use or disclosure is necessary to lessen or prevent a serious threat to life, health or safety or a serious threat to public health or safety.

- 5.3. *Job applicants, staff members and contractors:* In relation to personal information or job applications, staff members and contractors, Whitford Catholic Primary School's primary purpose of collection is to assess, and if successful engage the applicant, staff member or contractor, as the case may be.
- 5.4. The purpose 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
 - To satisfy the Catholic Education Office and this school's legal obligations, in relation to child protection legislation
- 5.5. *Volunteers:* This school also obtains personal information about volunteers who assist the school in its functions or conduct associated activities to enable this school and the volunteers to work together and to satisfy legal obligations.
- 5.6. *Marketing and Fundraising:* This 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 this school may be disclosed to an organisation that assists in the school's fundraising, for example, the Parents and Friends Organisation.
- 5.7. Parents, staff, contractors and other members of the wider school community may from time to time receive fundraising information. School publications, such as weekly newsletters and the school website, which include personal information, may be used for marketing purposes.
- 5.8. *Exception in relation to related schools:* The Privacy Act allows each school, being legally related to each of the other schools conducted by the Catholic Education Office, to share personal (but not sensitive) information with other schools conducted by the Catholic Education Office. Other CEO schools may then only use this personal information for the purpose for which the CEO originally collected it. This allows schools to transfer information between them, for example, when a pupil transfers from a CEO school to another school conducted by the CEO.

6. Disclosure

Whitford Catholic Primary 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
- Parents
- Anyone who has received authorisation to have such information disclosed to them.

Whitford 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)
- Otherwise complying with the National Privacy Principles

7. Personal and Health

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose (that would be reasonably expected by the individual or their parents), unless parents agree otherwise, or the use or disclosure of the sensitive personal and health information is allowed by law.

8. Collection of Personal Information

Whitford Catholic Primary School where possible, collects personal information, sensitive information and health information directly from the individual or in the case of a student, their parents. Where possible the collection of personal information will be by the use of standard forms. However, the school will also receive additional information by email, letters, notes, telephone calls, in meetings, through financial transactions and photographic images.

The school may also collect personal and health information such as medical reports, references or reports where it is not reasonable or practical to collect that information from the individual directly.

The school may also receive unsolicited information which has not been sought through the usual methods of collection of information. The school will only store, use and disclose such information if it could otherwise have been collected through our usual methods of collection. Otherwise such unsolicited information will be destroyed, permanently deleted or disposed of as appropriate.

9. Management & Security

Computerised records: access to computerised records is restricted through the use of password entry and levels of access and security systems are designed to protect personal information. All staff are aware they are not to reveal or share personal passwords.

Files: Student files, including confidential assessments, are housed in filing cabinets in the main office. Files are locked at all times other than during normal hours. Access to these records is restricted to staff on a need to know basis.

Internal modifications: may not be made to personal information unless authorised specifically by the Principal or the person to whom the Principal has formally delegated such authority.

10. Updating Personal Information

This 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 a school by contacting the school at any time. This is done directly in writing to the Principal. Personal information that is no longer needed is destroyed in a secure manner, deleted or de-identified.

Information will be kept until such time as a former student would have reached the age of twenty five. As a rule, the seven year statutory limit applies.

11. Access to Personal Information

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the CEO or a school holds about them and to advise the CEO or the school of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Pupils have access to their personal information through their parents/guardians.

Requests for access to all personal information held by the school are to be made in writing to the Principal.

The school may require parents to verify their identity and specify what information is required. This school may charge a fee to cover the cost of verifying the 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 the school does not agree to provide you with access or to amend personal information, the individual will be notified accordingly. Where appropriate, the school will provide you with reasons for the decision.

Privacy Complaints

If an individual wishes to make a complaint about a breach of the Australian Privacy Act, they may do so in writing or verbally by contacting the Principal. The school will respond within a reasonable time and may seek further information from the individual to provide a full and complete response.

A complaint may also be made to the office of the Australian Information Commission.

12. Consent and Rights of Access to the Personal Information of Pupils

Whitford Catholic Primary School respects every parent's right to make decisions concerning their child's education.

As a general rule, Whitford 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/guardians. Whitford Catholic Primary School will treat consent given by parents as consent given on behalf of the pupil, and notice to parents, will act as a notice given to the pupil.

Parents/guardians 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 this school's duty of care to the pupil.

Whitford Catholic Primary School may, at its discretion, on the request of the 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.

13. Enquiries

The Principal should be contacted directly, should there be any queries about the way in which personal information it holds is managed.

REFERENCES

Bishops Mandate for the Catholic Education Commission of Western Australia, 2009 -2015

National Catholic Education Commission Privacy Compliance Manual

Privacy Act 1988

School Education Act 1999

Children and Community Services Act 2004

2-D1 Dispute & Complaint Resolution