



**SAINT HELENA'S**  
CATHOLIC PRIMARY SCHOOL

*Something Beautiful for God*

# **PRIVACY POLICY**

**Policy Area: Community**

**Date of Review: 2019**

## 1. 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 schools to demonstrate this commitment in the manner in which they protect information that they hold about their school community. The Catholic school requires information about students and their families in order to provide for the education of these students.

The *Privacy Amendment (Private Sector) Act 2000* amends the *Privacy Act 1988* to direct the manner in which private sector organisations, including Catholic schools and systems, manage the personal and sensitive information of individuals.

The purpose of the new 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.

## 2. DEFINITIONS

**Personal Information** – Information which can identify an individual.

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

## 3. PRINCIPLES

1. St Helena's Catholic Primary School has a responsibility to use and manage personal and sensitive information collected in accordance with the Privacy Act 1988.
2. St Helena's Catholic Primary School has a responsibility to inform individuals of the purpose of collecting personal and sensitive information.
3. All information is collected for the primary purpose of the Catholic education of the student.

## 4. PROCEDURES

1. The type of information St Helena's Catholic Primary School (SHCPS) collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:
  - students, parents/guardians and their families before, during and after the course of a student's enrolment at the school;
  - job applicants, staff members, volunteers and contractors; and
  - other people who come into contact with the school.

2. SHCPS will generally collect personal information held about an individual by way of forms filled out by parents/guardians or students, face-to-face meetings and interviews and telephone calls. On occasions, people other than parents/guardians and students provide personal information. 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.
3. SHCPS will use personal information it collects, including sensitive information, for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection, or for which consent has been given.
4. In relation to personal information of students and parents/guardians, SHCPS's primary purpose of collection is to enable the school to provide schooling for the student. This includes satisfying the needs of parents/guardians, the needs of the student and the needs of SHCPS throughout the whole period the student is enrolled at the school.
5. The purposes for which SHCPS uses personal information of students and parents/guardians include:
  - to keep parents/guardians informed about matters related to their child's schooling, through correspondence, newsletters, the school website and magazines;
  - day-to-day administration of the school;
  - caring for students' 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.
6. In some cases where SHCPS requests personal information about a student or parent/guardian, if the information requested is not provided, the school may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.
7. In relation to personal information of job applicants, staff members and contractors, SHCPS's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.
8. The purposes for which SHCPS 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 donations and marketing for the school; and
  - to satisfy the school's legal obligations, for example, in relation to child protection legislation.
9. SHCPS also obtains personal information about volunteers who assist the school in its functions or conduct associated activities to enable the school and the volunteers to work together.
10. SHCPS 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 provide a quality learning environment in which both students and staff thrive. Personal information held by the school may be disclosed to organisations that assist in the school's fundraising, for example, the school's Parents and Friends' Committee.

11. 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.
12. The *Privacy Act* allows each school, being legally related to each of the other schools conducted by the Catholic Education Western Australia (CEWA) to share personal (but not sensitive) information with other schools conducted by the CEOWA. Other schools may then only use this personal information for the purpose for which it was originally collected by the CEOWA. This allows schools to transfer information between them, for example, when a student transfers from a CEOWA school to another school conducted by the CEWA.
13. SHCPS may also disclose personal information, including sensitive information, held about an individual to:
  - CEOWA
  - 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/guardians;
  - anyone who has received authorisation to have such information disclosed to them
  - anyone to whom the school is required to disclose information to by law.
14. SHCPS 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.
15. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose unless the provider agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.
16. SHCPS's staff are required to respect the confidentiality of students' and parents'/guardians' personal information and the privacy of individuals.
17. SHCPS endeavours to protect the personal information the 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.
18. Under the *Commonwealth Privacy Act* and the *Health Records 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. Students will generally be able to access and update their personal information through their parents/guardians, but older students may seek access and correction themselves.
19. To make a request to access or update any information SHCPS holds about a parent/guardian or their child, a written request should be forwarded to the school's Principal.

20. SHCPS will require verification of identity and specifics of information required. The 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 access to information cannot be provided, the school will provide written notice explaining the reasons for refusal.
21. Generally, SHCPS will refer any requests for consent and notices in relation to the personal information of a student to the student's parents/guardians. The school will treat consent given by parents/guardians as consent given on behalf of the student and notice to parents/guardians will act as notice given to the student.
22. As mentioned above, parents/guardians may seek access to personal information held by SHCPS about them or their child by contacting the Principal. However, there will be occasions when access is denied. Such occasions would include where the 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.
23. SHCPS may, at the Principal's discretion, and on the request of a student, grant that student access to information held by the school about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents/guardians. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warrant.
24. SHCPS 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.
25. All inquiries regarding the *Privacy Policy* of SHCPS and its management of personal information should be directed to the Principal.