

# All Saints Catholic Primary School

# Privacy Policy



All Saints Catholic Primary School seeks to protect the personal and health information of children, parents, caregivers, staff, contractors and volunteers. This is the School's legal and ethical responsibility. All Saints Catholic Primary School will abide by the principles in the Commonwealth's Privacy Act 1988, as amended by the Privacy Amendment Act (Enhanced Privacy Protection) 2012, and the 13 Australian Privacy Principles (APPs), and exercise all reasonable care in order to protect the personal health and information of students and staff.

The following Privacy statement provides information and details to students, parents, employees, contractors and volunteers regarding:

- the personal information the School collects and how it is collected;
- how the School will use the personal information provided by others;
- to whom and in what circumstances the School discloses personal information;
- how the School stores personal information;
- how the School manages and treats sensitive information;
- how children, parents, employees, contractors and volunteers may correct the personal information held about them;
- how the School manages consent and access to personal information of children;
- how enquiries and complaints are managed; and
- what exemptions apply with regard to any of the above.

## Individuals' privacy is important

This Privacy statement applies to All Saints Catholic Primary School conducted by the Archdiocese of Adelaide and sets out how the CEO (Adelaide) and All Saints Catholic Primary School manages personal information provided to or collected by it. In this Privacy Statement, All Saints Catholic Primary School is referred to as the 'School'.

All Saints Catholic Primary School is bound by the National Privacy Principles contained in the Commonwealth *Privacy Act 1988*.

From time to time, this Privacy Statement may be reviewed and updated to take account of new laws and technologies, changes to the School's operations and practices and to make sure it remains appropriate to the changing school environment.

The provisions of this statement apply to the School and the Catholic Education Office in the Archdiocese of Adelaide, the legal entity for which is the Catholic Church Endowment Society Inc.

## What kind of personal information does the School collect and how do they collect it?

The type of information the School collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- children and their parents and/or guardians ('parents') before, during and after the course of a child's enrolment at the School;
  - name contact details (next of kin), date of birth, gender, language background, previous school and religion;
  - parent's education, occupation and language background;
  - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
  - conduct and complaint records, or other behaviour notes, and school reports;
  - information about referrals to government agencies;
  - counselling reports;
  - health fund details and Medicare number;
  - any court orders;
  - volunteer information; and
  - photo and videos at school events;
- job applicants, staff members, volunteers and contractors:
  - name, contact details (including next of kin), date of birth, and religion;
  - information on job application;
  - professional development history;
  - salary and payment information, including superannuation details;

- medical information (e.g. details of disability and/or allergies, and medical certificates);
- complaint records and investigation reports;
- leave details;
- photo and video at school events;
- workplace surveillance information;
- work emails and private emails (when using work email address) and internet browsing history; and
- other people who come into contact with the School, including name and contact details and any other information necessary for the particular contact with the school.

### **Personal Information provided by an individual**

The School will generally collect personal information held about an individual by way of forms filled out by parents or children, face-to-face meetings and interviews, telephone calls, email, through financial transactions and via the school apps and website. The School also collects information through data transfers from schools.

### **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 1988, this Privacy Statement does not apply to the Schools treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the school and employee.

## **How will the School use the personal information an individual provides?**

The School will use personal information it collects from an individual 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 an individual has consented.

### **Children and Parents**

For personal information about children and parents, a school's primary purpose of collection is to enable the School to provide schooling to children enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable children to take part in all the activities of the School. This includes satisfying both the needs of parents, the needs of the child and the needs of the School throughout the whole period the child is enrolled at the School.

The purposes for which the School uses personal information of children and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- to look after children's educational, social, spiritual and medical wellbeing;
- marketing publications;
- to refer unpaid debts to a debt collection agency;
- to contribute to aggregated data that CEO or the South Australian Commission for Catholic Schools Inc (SACCS) may require from time to time to meet their reporting, planning, contract and funding responsibilities on behalf of 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 child or parent, if the information requested is not obtained, the school may not be able to enrol or continue the enrolment of the child or permit the child to take part in a particular activity.

### **Job applicants, staff members, volunteers and contractors**

For personal information about job applicants, staff members, volunteers and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member, volunteer or contractor, as the case may be. The purposes for which the School uses personal information of job applicants, staff members, volunteers and contractors include:

- to administer the individual's employment or contract (as the case may be);
- for insurance purposes;
- to seek funds and marketing for the School;
- to contribute to aggregated data that SACCS and CEO use to meet their reporting, planning, contract and funding responsibilities;
- to enable SACCS and CEO to maintain necessary staff information for entitlements including long service leave, maternity leave, Workcover and other necessary industrial or employment purposes, and for accreditation and funding purposes;
- to satisfy CCES/CEO's and the School's legal obligations (for example, in relation to child protection legislation).

## **Volunteers**

A School also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as Parents and Friends, to enable the School and the volunteers to work together.

## **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 children and staff thrive. Personal information held by a School may be disclosed to an organisation that assists in the School's fundraising, for example, the Parents and Friends Association.

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.

## **Exception in relation to related schools**

The Privacy Act 1988 allows each diocesan school in the Archdiocese of Adelaide to share personal (but not sensitive) information with other diocesan schools within the diocese. Other diocesan schools may then only use this personal information for the purpose for which it was originally collected by CEO. This allows schools to transfer information between them, for example, when a child transfers from one school operated by CCES/CEO to another school operated by CCES/CEO. It also allows schools to transfer information to CEO.

## **To whom might the School disclose personal information?**

The School may disclose personal information (including sensitive information) held about an individual for educational, administrative and support purposes. This may include to:

- another school operated by CCES/CEO;
- a school within the Diocese of Port Pirie;
- the Catholic Education Office in South Australia;
- the South Australian Commission for Catholic Schools (SACCS);
- a congregational school;
- Catholic Church Insurances;
- government departments;
- the local parish;
- medical practitioners;
- people providing educational, support and health services to the school, including specialist visiting teachers, sports coaches, volunteers and counsellors;
- recipients of school publications, like newsletters and magazines;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration /Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- people providing administrative and financial services to the School;
- anyone you authorise the school to disclose information to; and
- anyone to whom we are required or authorised to disclose the information by law, including child protection laws.
- children's parents or guardians; and
- anyone to whom the individual authorises the school to disclose information.

Sometimes the School may ask individuals to consent to some disclosures or uses of personal information for certain purposes, either in writing or verbally. In other cases, consent may be implied.

## **Sending and storing 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 out Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); and/or
- otherwise complying with the National Privacy Principles or other applicable privacy legislations.

The School may use online or 'cloud' service providers to store personal information and sensitive information and to provide service to the School that involve the use of personal information and sensitive information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service is Microsoft 0365. Microsoft 0365 provides email and stores and processes limited personal information for this purpose. School personnel, CEO, SACCS and their service 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 Microsoft 0365 and ensuring its proper use.

## How will sensitive information be treated?

‘Sensitive information’ means information relating to a person’s racial or ethnic origin, political opinions, religion, trade unions or other professional or trade association membership, sexual orientation or practices 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 the individual agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

## Management and security of personal information

The School’s staff are required to respect the confidentiality of children and parents’ personal information and the privacy of individuals.

The School have in place steps to protect the personal information held 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.

## Individuals have the right to check what personal information the School holds about them

Under the Commonwealth Privacy Act, individuals may seek access to any personal information that CEO or the School holds about them and to advise of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Children will generally have access to their personal information through their parents, but older children may seek access and correction themselves.

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

For individuals to make a request to access any information the School holds about them, they should contact the School’s Principal by telephone or in writing.

The School may require individuals to verify their identity and specify what information they require. A fee may be charged to cover the cost of verifying the individual’s application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the individual will be advised of 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 children

The School respect 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 child to the child’s parents. The School will treat consent given by parents as consent given on behalf of the child, and notice to Parents will act as notice given to the child.

Parents may seek access to personal information held by the School about them or their child by contacting the School’s Principal by telephone or in writing. 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 child.

The School may, at its discretion, on the request of a child grant that child access to information held by the School about them, or allow a child 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 child and/or the child’s personal circumstances so warrant it.

## Enquiries and Complaints

If you would like further information about the way the School manages the personal information it holds, please contact the Director of Catholic Education or the School Principal by writing or telephone. The school will investigate any complaint as soon as practicable after it has been made.

## Definitions

**The School** includes All Saints Catholic Primary School as well as sites on which staff or others engaged in duties or activities such as excursions or conference attendance sanctioned by the School.

**Staff** means staff employed by any Catholic School or the Catholic Education Office in the Archdiocese of Adelaide.

**Parents** means parents and/or guardians.

**Personal information** is information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not, and whether the information is recorded in a material form or not. It includes all personal information regardless of its sources.

Sensitive information is a type of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information.

## Related Policies, Procedures and Resources

This statement is to be read in conjunction with, and is additional to, any other relevant South Australian Commission for Catholic Schools (SACCS), school or CEO statement, procedure or support document included:

- CEO Privacy Policy (2018)
- CEO Privacy Statement (2018)
- National Catholic Education Commission and National Council of Independent School's Association Privacy Compliance Manual (2019)
- Privacy Amendment (Enhanced Privacy Protection) Bill 2012
- Commonwealth Privacy Act (1988)
- Australian Privacy Principles [Australian Privacy Principles — OAIC](#)

Sign: \_\_\_\_\_  
(Principal)

Date: \_\_\_\_\_

Sign: \_\_\_\_\_  
(Chairperson on behalf of School Board)

Date: \_\_\_\_\_

*Date to be reviewed: November 2024*