



PRIVACY POLICY

Chisholm Catholic College ("the College") requires information about students and their families in order to provide for the education of our students. The College recognises the significance of protecting the information collected and held by the College.

Chisholm Catholic College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988.

Chisholm Catholic College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to schools' operations and practices and to make sure it remains appropriate to the changing school environment.

Definitions

In general terms the College may collect personal information, sensitive information and health information.

- *Personal information* is the general term that is used to describe information or an opinion about an identified individual or an individual that is reasonably identifiable. It can include such things as names, addresses and other contact details: dates of birth; marital status; next of kin details; financial information, photographic images and attendance records.
- *Sensitive information* is included under personal information and can include such things as religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, professional or union memberships, family court orders and criminal records. It also includes health information.
- *Health information* is a subset of sensitive information and includes any information collected about an individual's health or disability and any information collected in relation to a health service that is provided. It can include such things as medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.
- Confidential - Information given in trust whereby a relationship not to betray is established. This confidentiality may be broken if required by Law.

WHAT KINDS OF PERSONAL INFORMATION DOES THE COLLEGE COLLECT AND HOW DOES THE COLLEGE COLLECT IT?

The nature and type of personal information the College collects in the normal course of its operations is largely dependent upon whose information it is collecting and the reason for collecting it.

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

- Students and parents and/or guardians ("Parents") 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 College.

Personal information you provide: If it is reasonable and practical to do so, the College will collect personal information directly from the individual concerned. In the case of students it is reasonable that the majority of personal information will be collected from the Parents.

To facilitate this process the College has a number of specifically designed forms, which attempts to standardise the collection of personal information.

Personal information provided by other people: In some circumstances the College 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.

Unsolicited information: In some circumstances the College, may receive personal information even though it has not sought that information: this is known as ‘unsolicited information’. In those instances where the College has received unsolicited information it will only hold, use and/or disclose that information if it could otherwise do so had the College collected it in accordance with this Privacy Policy. Where that unsolicited information could not have been collected by the means outlined in this Privacy Policy then the College will take steps to destroy, permanently delete or de-identify the information.

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, where the treatment is directly related to a current or former employment relationship between the College and employee.

HOW WILL THE COLLEGE USE THE PERSONAL INFORMATION YOU PROVIDE?

The College will use personal information it collects from you to carry out the reasonable expectations of our day to day operations. This is regarded as the “primary purpose”. The College may also use the personal information for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Students and Parents: In relation to personal information of students and Parents, the College’s primary purpose of collection is to enable the College to provide schooling for the student. This includes satisfying the needs of Parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

The College collects, uses and exchanges your information so that it can undertake and perform various functions including, but not limited to:

- Provide education, pastoral care, extra-curricula and health services;
- Satisfy its legal obligations including duty of care and child protection obligations;
- Keep Parents informed about matters related to their child’s schooling, through correspondence (written and electronic), newsletters and magazines;
- Day-to-day administration of the College;
- Looking after students’ educational, social and medical wellbeing;
- Market, promote and undertake fundraising activities;
- Support the activities of College associations such as the P.E.G., Alumni and the like;
- Improve our day to day operations including training of staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis.

In some cases where the College requests personal information about a student or Parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

Job applicants, staff members and contractors: In relation to personal information of job applicants, staff members and contractors, the College’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 of which the College uses personal information of job applicants, staff members and contractors include:

- In administering the individual’s employment or contract, as the case may be;
- For insurance purposes;
- Seeking donations and marketing for the College; and
- To satisfy the College’s legal obligations, for example, in relation to child protection legislation.

Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as [alumni associations], to enable the College and the volunteers to work together.

WHO MIGHT THE COLLEGE DISCLOSE PERSONAL INFORMATION TO AND STORE YOUR INFORMATION WITH?

The College will only use personal information for purposes for which it was given to us, or for the purposes which are related (or indirectly related in the case of sensitive information) to one or more of the College's functions or activities. The College may disclose personal information, including sensitive information, held about an individual to:

- another school;
- Government departments;
- medical practitioners;
- people providing services to the College, including visiting teachers, counsellors and sports coaches;
- recipients of College publications, such as our newsletters, magazines and websites;
- Parents;
- anyone you authorise the College to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

Sending and storing information overseas: A school may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, a 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 or other applicable privacy legislation.

The school may use online or 'cloud' service providers to store personal information and to provide services to the school that involve the use of personal 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.

HOW DOES THE COLLEGE TREAT SENSITIVE INFORMATION?

In referring to "sensitive information", the College 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 practices or criminal record, that is also personal information; 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.

MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

The College's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information the College 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.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

Under the Commonwealth Privacy Act an individual has the right to obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. Students will generally be able to access and update their personal information through their Parents, but older students 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 College holds about you or your child, please contact the Principal in writing. The College may require you to verify your identity and specify what information you require. The College 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 College 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 PERSONAL INFORMATION OF STUDENTS

The College respects every Parents right to make decisions concerning their child's education.

Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. The College will treat consent given by Parents as consent given on behalf of the student and notice to Parents will act as notice given to the student.

The College will seek consent of parents before the exchange of information occurs. This may include, requests for external reports such as psychology/DCP etc.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contact 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 College's duty of care to the student.

The College may, at its discretion, on the request of a student grant that student access to information held by the College about them, or allow a student 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 student and/or the student's personal circumstances so warranted.

ENQUIRIES AND COMPLAINTS

If you would like further information about the way the College manages the personal information it holds or wish to make a complaint that you believe that the College has breached the Australian Privacy Principles, you may do so in writing to the Principal. The College 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.

CHANGES TO OUR PRIVACY AND INFORMATION HANDLING PRACTICES

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website (www.chisholm.wa.edu.au) for a current copy.

Revision

Reviewed May 2020. Next due for revision 2022.