



Privacy Policy

Rationale:

This Privacy Policy sets out how St Mary's Primary School manages personal information provided to or collected by it. St Mary's Primary School collects and holds personal information, including health and other sensitive information. The information is collected for the primary purpose of data entry and storage. Secondary some information will be shared to CEOM and Department of Education on request.

Aim:

The types of information that St Mary's is required to collect from advice and guidance of governing bodies is from students and parents and/or guardians before, during and after the course of a student's enrolment at the School.

St Mary's will generally collect personal information held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and students (such as job applicants and contractors) provide personal information to the School. 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.

St Marys needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate the delivery of schooling to its students and its educational and support services, conduct the job application process and fulfil other obligations and processes. However, in some limited circumstances some activities and interactions with the School may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

In relation to personal information of students and Parents, St Mary's primary purpose of collection is to enable the School to provide schooling to students enrolled at the School (including educational and support services for the student), exercise its duty of care and perform necessary associated administrative activities which will enable students to take part in all the activities of the School. This includes satisfying the needs of Parents, the needs of the student and the needs of St Mary's throughout the whole period the student is enrolled at the School.

This information will include:

- name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
- medical information (eg details of disability and/or allergies and details of any assistance the student receives in relation to those disabilities, medical reports, names of doctors)
- conduct and complaint records, or other behaviour notes, school attendance and school reports

- information about referrals to government welfare agencies
- counselling reports
- health fund details and Medicare number
- any court orders
- volunteering information (including Working With Children Checks)
- photos and videos at school events.

Job applicants, staff members, volunteers and contractors, including:

- 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 (eg details of disability and/or allergies and medical certificates)
- complaint records and investigation reports
- leave details
- photos and videos at school events

In some circumstances the St Mary's 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. The type of information the School may collect from another school may include:

- academic records and/or achievement levels
- information that may be relevant to assisting the new school meet the needs of the student including any adjustments

The purposes for which the School uses personal information of students and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- day-to-day administration of the School
- looking after students' educational, social and medical wellbeing
- seeking donations and marketing for St Mary's
- seeking feedback from students and parents on school performance and improvement, including through school improvement surveys.
- to satisfy the School's legal obligations and allow the School to discharge its duty of care
- to satisfy the School service providers' legal obligations, including the Catholic Education Commission of Victoria Ltd (CECV) and the Catholic Education Offices.

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

In relation to personal information of job applicants and contractors, St Mary's primary purpose of collection is to assess and (if successful) to engage the applicant, or contractor, as the case may be.

The purposes for which St Mary's uses personal information of job applicants 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
- satisfying the School's legal obligations, for example, in relation to child protection legislation.

St Mary's also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as parish and school community groups e.g. Garden Club,

Craft Club, Working Bee, to enable the School and the volunteers to work together, to confirm their suitability and to manage their visits.

St Mary's contracts with external providers to provide counselling services for some students. The principal may require the Counsellor to inform him or her or other teachers of any issues the principal and the Counsellor believe may be necessary for St Mary's to know for the well-being or development of the student who is counselled or other students at the School.

St Mary's may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising.

St Mary's may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. In the event that student information is shared with a third party, separate parental written consent will be obtained prior to this occurring. Typical requests for sharing information may include to:

- School service providers which provide educational, support and health services to the School, (either at the School or off campus) including the Catholic Education Commission of Victoria Ltd (CECV), Catholic Education Offices, specialist visiting teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools
- third party service providers that provide online educational and assessment support services, services in relation to school improvement surveys, document and data management services, or applications to schools and school systems including the Integrated Catholic Online Network (ICON) and Google's G Suite, including Gmail and, where necessary, to support the training of selected staff in the use of these services
- other third parties which the school uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with Parents
- another school including to its teachers to facilitate the transfer of a student
- State and Federal government departments and agencies
- health service providers
- recipients of School publications, such as newsletters and magazines
- student's parents or guardians and their emergency contacts
- assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority
- anyone you authorise the School to disclose information to
- anyone who we are required or authorised to disclose the information to by law, including child protection laws.

Nationally Consistent Collection of Data (NCCD) on School Students with Disability

St Mary's is required by the Federal *Australian Education Regulation 2013* (the Regulation) to provide certain information under the NCCD on students with a disability. The school provides the required information to the CECV, as an approved authority, to provide on the school's behalf. Under the NCCD, the following information is required for each student with a disability:

- their level of education (i.e. primary or secondary)
- their category of disability (i.e. physical, cognitive, sensory or social/emotional)
- their level of adjustment (i.e. support provided within quality differentiated teaching practice, supplementary, substantial or extensive adjustment).

Student information provided for the purpose of the NCCD does not explicitly identify any student. However St Mary's will disclose students' names to the CECV, to enable CECV to undertake financial modelling about funding for particular students, including ongoing evaluation of the adequacy of the funding for individual students under the NCCD. The CECV will not disclose a student's identity for the NCCD.

St Mary's 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; or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

St Mary's will gather data is through **CEMSIS**, the Catholic Education Melbourne School Improvement Surveys. Students, families and staff are invited to participate voluntarily in CEMSIS using a secure and purpose-built online platform. This survey allows school leaders to access summary reports that visualise the results of the student, family and staff surveys. The data is used for school improvement. The CEMSIS survey platform is operated by an independent supplier, ORIMA Research Pty Ltd. The platform meets with the very high security and privacy standards for handling student and school data.

St Mary's may also store personal information [including sensitive information] in the 'cloud'. This means that the information is held on the servers of third party cloud service providers engaged by the School. The servers may be situated in or outside Australia.

St Mary's may from time to time use the services of third party online service providers (including for the delivery of services and third party online applications, or Apps relating to email, instant messaging and education and assessment, such as Google's G Suite, including Gmail) which may be accessible by you. Some personal information including sensitive information, may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.

St Mary's personnel and the school's service providers, and the CECV and its 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 services ensuring their proper use.

As not all countries are bound by laws which provide the same level of protection for personal information provided by the APPs, the School makes reasonable efforts to be satisfied about the security of any personal information collected, processed and stored outside Australia, including that of cloud and third party service providers.

The countries in which the servers of cloud service providers and other third party service providers are located may include:

- The servers may be situated in or outside Australia.

Where personal and sensitive information is retained by a cloud service provider on behalf of CECV to facilitate Human Resources and staff administrative support, this information may be stored on servers located in or outside Australia.

In referring to 'sensitive information', St Mary's 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.

St Mary's School's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

St Mary's has in place steps 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. This includes responding to any incidents which may affect the security of the personal information it holds. If we assess that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, we will notify them and the Office of the Australian Information Commissioner of the breach. It is recommended that parents and the school community adopt secure practices to protect themselves. You should ensure that all passwords you use are strong and regularly updated and that your log in details are kept secure. Do not share your personal information with anyone without first verifying their identity and organisation. If you believe any of your personal information has been compromised, please let the School know immediately.

Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information and health records respectively which the School holds about them and to advise St Mary's 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 the access rights set out in the applicable legislation.

To make a request to access or to 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. St Mary's may require you to verify your identity and specify what information you require. St Mary's 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, St Mary's 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.

St Mary's respects every Parent's right to make decisions concerning their child's education.

Generally, St Mary's will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. St Mary's 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.

Parents may seek access to personal information held by St Mary's about them or their child by contacting the [School Principal] or [School Administrator] by telephone or in writing. However, there may 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 student.

St Mary's may, at its discretion, on the request of a student grant that student access to information held by St Mary's 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 warrant it.

If you would like further information about the way St Mary's manages the personal information it holds about you, or wish to complain that you believe that the School has breached its privacy obligations, please contact the School Principal by writing or telephone at 9736 2219 or principal@smmountevelyn.catholic.edu.au. The School will investigate your 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.

If you are not satisfied with the School's decision you may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are:

GPO Box 5218, Sydney, NSW 2001

Telephone: 1300 363 992

www.oaic.gov.au

Evaluation

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.

This policy will be reviewed as part of the school's four-year review cycle.