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# **Privacy Policy**

## **Developed May 2018**

## **Review May 2021**

### **Identity Statement**

St Joseph's; a child safe school, is a Catholic Community in the Josephite tradition where we learn and grow in the Spirit together.

### **Vision Statements**

St Joseph's; a child safe school, strives to be an educating community:

Where the total development of each child is nurtured.

Where an environment of trust, respect, hope and safety is built, with direct reference and consideration to child safe standards and policies.

Where families and St Joseph's School work in partnership sharing the responsibility to educate the child.

Where school life is an integral part of the parish and the wider community.

Where the students learn in a challenging, enjoyable and cooperative way.

Where the teachings of Jesus are taught, modelled and lived.

# Graduate Outcomes

St Joseph's students learn to become:

Problem solving, inquiring, critical thinkers with high competencies in literacy and numeracy.

Technologically competent and ethical users of technology.

Hope filled, independent, resilient and confident young people.

Knowledgeable and appreciative of the Catholic faith.

Socially adept, respectful, just, environmentally conscious and appreciative of diversity.

**At St Joseph's we are being our best when we are...**

**Being respectful;**

**Being friendly;**

**Being positive learners.**

This Privacy Policy sets out how St Joseph's School manages personal information provided to or collected by it.

St Joseph's School is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth *Privacy Act 1988*. In relation to health records, St Joseph's School is also bound by the *Health Records Act 2001* (Vic.) and the Health Privacy Principles in that Act.

St Joseph's School may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to St Joseph's School's operations and practices and to make sure it remains appropriate to the changing school environment.

**What kinds of personal information does St Joseph's School collect and how does St Joseph's School collect it?**

St Joseph's School collects and holds 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 St Joseph's School
  - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
  - Parents' education, occupation and language background
  - medical information (e.g. 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
  - work emails and private emails (when using work email address) and internet browsing history
- other people who come into contact with St Joseph's School, including name and contact details and any other information necessary for the particular contact with St Joseph's School.

**Personal Information you provide:** St Joseph's School 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 St Joseph's School.

**Personal Information provided by other people:** In some circumstances St Joseph's 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. The type of information St Joseph's 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

**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 St Joseph's School's treatment of an employee record where the treatment is directly related to a current or former employment relationship between St Joseph's School and employee. St Joseph's School handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001 (Vic.)*.

**Anonymity:** St Joseph's School 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 St Joseph's School may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

### **How will St Joseph's School use the personal information you provide?**

St Joseph's School will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

**Students and Parents:** In relation to personal information of students and Parents, St Joseph's School's primary purpose of collection is to enable St Joseph's School to provide schooling to students enrolled at St Joseph's 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 St Joseph's School. This includes

satisfying the needs of Parents, the needs of the student and the needs of St Joseph's School throughout the whole period the student is enrolled at St Joseph's School.

The purposes for which St Joseph's 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 St Joseph's School
- looking after students' educational, social and medical wellbeing
- seeking donations and marketing for St Joseph's School
- to satisfy St Joseph's School's legal obligations and allow St Joseph's School to discharge its duty of care
- to satisfy St Joseph's School service providers' legal obligations, including the Catholic Education Commission of Victoria Ltd (CECV) and the Catholic Education Offices.

In some cases where St Joseph's School requests personal information about a student or Parent, if the information requested is not provided, St Joseph's 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.

**Job applicants and contractors:** In relation to personal information of job applicants and contractors, St Joseph's School'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 Joseph's School 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 St Joseph's School
- satisfying St Joseph's School's legal obligations, for example, in relation to child protection legislation.

**Volunteers:** St Joseph's School also obtains personal information about volunteers who assist St Joseph's School in its functions or conduct associated activities, to enable St Joseph's School and the volunteers to work together, to confirm their suitability and to manage their visits.

**Counsellors:** St Joseph's School 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 Joseph's School to know for the well-being or development of the student who is counselled or other students at St Joseph's School.

**Parish:** St Joseph's School may disclose limited personal information to St Joseph's School parish to facilitate religious and sacramental programs, and other activities such as fundraising.

**Marketing and fundraising:** St Joseph's School treats marketing and seeking donations for the future growth and development of St Joseph's School as an important part of ensuring that St Joseph's School continues to provide a quality learning environment in which both students and staff thrive. Personal information held by St Joseph's School may be disclosed to organisations that assist in St Joseph's School's fundraising, for example, St Joseph's School's Foundation or alumni organisation [or, on occasions, external fundraising organisations].

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 and sometimes people's images, may be used for marketing purposes.

### **Who might St Joseph's School disclose personal information to and store your information with?**

St Joseph's School may disclose personal information, including sensitive information, held about an individual for **educational, administrative and support purposes**. This may include to:

- School service providers which provide educational, support and health services to St Joseph's School, (either at St Joseph's 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, 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
- CECV and Catholic Education offices to discharge its responsibilities under the *Australian Education Regulation 2013* (Regulation) and the *Australian Education Act 2013* (Cth) (AE Act) relating to students with a disability.
- other third parties which St Joseph's School uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with Parents
- another school including its teachers to facilitate the transfer of a student
- Federal and State 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 St Joseph's 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 on School Students with Disability**

St Joseph's School is required by the Federal *Australian Education Regulation (2013)* and *Australian Education Act 2013* (Cth) (AE Act) to collect and disclose certain information under the *Nationally Consistent Collection of Data* (NCCD) on students with a disability. St Joseph's School provides the required information at an individual student level to the Catholic Education Offices and the CECV, as an approved authority. Approved authorities must comply with reporting, record keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

***Sending and storing information overseas:*** St Joseph's School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, St Joseph's 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 Joseph's School 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 Joseph's School personnel and 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.

St Joseph's School makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed and stored outside Australia, in connection with any cloud and third party services and will endeavour to ensure the cloud is located in countries with substantially similar protections as the APPs.

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

- **United States of America and Hong Kong.**

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.

### **How does St Joseph's School treat sensitive information?**

In referring to 'sensitive information', St Joseph's School 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**

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

St Joseph's School has in place steps to protect the personal information St Joseph's 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 St Joseph's 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 St Joseph's School know immediately.

### **Access and correction of personal information**

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 St Joseph's School holds about them and to advise St Joseph's School 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 St Joseph's School holds about you or your child, please contact the Leo Jones, School Principal or [Janelle O'Dwyer, School Administrator by telephone or in writing. St Joseph's School may require you to verify your identity and specify what information you require. St Joseph's School 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 Joseph's School 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 the personal information of students**

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

Generally, St Joseph's School will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. St Joseph's School 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 Joseph's School about them or their child by contacting Leo Jones, the School Principal or Janelle O'Dwyer, the 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 St Joseph's School's duty of care to the student.

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

### **Enquiries and complaints and contact details**

If you would like further information about the way St Joseph's School manages the personal information it holds about you, or wish to complain that you believe that St Joseph's School has breached its privacy obligations, please contact Leo Jones the School Principal by writing or telephone at 0357942608. St Joseph's 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 St Joseph's 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](http://www.oaic.gov.au)