



HOLY SPIRIT SCHOOL

PRIVACY POLICY

RATIONALE

Holy Spirit 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.

1 YOUR PRIVACY IS IMPORTANT

- 1.1 This statement outlines the policy on how Holy Spirit School uses and manages personal information provided to or collected by the school.
- 1.2 The school is bound by the National Privacy Principles contained in the Commonwealth Privacy Act.
- 1.3 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 and the Catholic Education Office's {CEO's} operations and practices, and to ensure it remains appropriate to the ever-changing school environment.

2. WHAT KIND OF PERSONAL INFORMATION DOES THE SCHOOL COLLECT AND HOW DO WE COLLECT IT?

- 2.1 The type of information the school collects and holds includes personal information, including sensitive information, about:
 - Students and parents\guardians before, during and after the course of a student's enrolment at the school
 - Job applicants, staff members, volunteers and contractors
 - Other people who come into contact with the school
- 2.2 Personal information provided by parents\guardians as well as students: The 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, and telephone calls.

- 2.3 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 or other professional or reference from another educational institution.
- 2.4 Exception in relation to employee records: Under the Privacy Act, the National Privacy Principles do not apply to an employee record. As a result, the school Policy does not apply to the treatment of an employee record where the treatment is directly related to a current or former employment relationship between the school and the employee.

3 HOW DOES THE SCHOOL USE THE PERSONAL INFORMATION PROVIDED TO IT BY PARENTS\GUARDIANS, STUDENTS AND OTHERS?

- 3.1 The school collects personal information, including sensitive information, for the primary purpose of enabling it to provide proper schooling for its students, and for such secondary purposes which are related to this primary purpose or to which you have consented.
- 3.2 The purposes for which the school uses personal information of students and parents include:
 - keeping parents informed about matters related to their child's schooling, through correspondence, weekly newsletters, the school Annual
 - general day-to-day administration of the school
 - caring for students' educational, social, spiritual and medical well-being
 - marketing, seeking donations for the school
 - satisfying the CEO's and the schools legal obligations and allowing the school to discharge its duty of care.
- 3.3 Where personal information is requested by the school but not obtained, the school may not therefore be in a position to enrol a student or continue the enrolment of a student.
- 3.4 Job applicants, staff members and contractors: In relation to personal information of job applicants, staff members and contractors, the schools primary purpose of collection is to assess, and if successful, engage the applicant, staff member or contractor, as the case may be.
- 3.5 The purpose for which the school uses personal information of job applicants, staff members and contractors include
 - administering the individual's employment or contract as the case may be
 - insurance
 - seeking funds and marketing for the school

- satisfying the schools legal obligations, for example, in relation to child protection legislation.

3.6 Volunteers: The school also obtains personal information about volunteers who assist it in its functions and in relation to associated activities, such as the P&F Association, all of whom contribute to enable the school and such volunteers to work together.

4. **TO WHOM MIGHT THE SCHOOL DISCLOSE PERSONAL INFORMATION?**

4.1 The school may disclose personal information, including sensitive information, held about an individual to:

- another school
- Catholic Education Office
- Government departments
- Medical practitioners
- Police
- People providing services to the school, including specialist visiting teachers {for example, instrumental music tutors} and sports coaches
- Recipients of school publications such as newsletter and the Magazine
- Anyone who has received authorisation to have such information disclosed to them
- Other parents such as class coordinators and convenors of special functions {class lists, names and contact phone numbers}
- Volunteers {at camps, for example}
- Bodies and clubs associated with the school

4.2 The school will not send personal information about an individual outside Australia without:

- first obtaining the consent of the individual {in some instances, this consent will be implied}
- otherwise complying with the National Privacy Principles

5. **HOW DOES THE SCHOOL TREAT SENSITIVE INFORMATION?**

5.1 Sensitive information refers to information relating to a person's

- Racial or ethnic origin
- Political opinions
- Religion
- Trade union or other professional or trade association membership
- Sexual preferences
- Criminal record
- Health

5.2 Sensitive information will be used and disclosed only for the purposes for which it was provided or for a directly-related secondary purpose unless the individual directs otherwise or the use or disclosure of the sensitive information is allowed by law.

6. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

- 6.1 The school respects the confidentiality of students' and parents'/guardians' personal information and the privacy of individuals. The school will act to protect the personal information it holds from misuse, loss, unauthorised access or disclosure.
- 6.2 Computerised records: access to computerised records is restricted through the use of a password entry and levels of access.
- 6.3 Files: student files are housed in school filing cabinets in the main office. Files are locked at all times other than during normal office hours.
- 6.4 Internal modifications may not be made to personal information held either in computerised records or in the vertical file unless authorised specifically by the Principal or the person to whom the Principal has formally delegated such authority.

7. UPDATING PERSONAL INFORMATION

- 7.1 The school endeavours to ensure that the personal information it holds is accurate, complete and up-to-date.
- 7.2 Personal information held by the school may be updated at any time by the person who provided that information. This is done directly and in writing through the Principal's secretary during business hours.
- 7.3 All personal information is deleted from the school database when that information is no longer necessary. Information will be kept until such time as a former student would have reached the age of twenty-five years. As a general rule, the seven-year statutory limit applies.
- 7.4 The school may hold record for archival purposes.

8. YOU HAVE THE RIGHT TO CHECK WHAT PERSONAL INFORMATION THE SCHOOL HOLDS ABOUT YOU

- 8.1 Under the Commonwealth Privacy Act, any person – staff, contractor, student, parent/guardian – 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.
- 8.2 Students have access to any information the school holds about them through their parents/guardians. Other students {16 yrs or above} may access the information themselves {ref 9.4 below}.

- 8.3 Requests for access to all personal information held by the school are to be made in writing to the Principal. You will be required to verify your identity and specify what information you require. The school reserves the right to charge a fee for retrieval of such information if this involves more than standard procedure. Such a fee would cover the cost of locating, reviewing, verifying and copying any material requested.

9. CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

- 9.1 The school respects every parent'/guardians' right to make decisions concerning their child's education.
- 9.2 As a general rule, the school will refer any requests for consent and notices in relation to the personal information of a student to that student's parent/guardian. 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.
- 9.3 Parents/Guardians may seek access to personal information held by the school about them or their child by contacting the Principal. However, there will be occasions when access to such information will be denied. Such occasions would include where release of information would have an unreasonable impact on the privacy of others or where the release of such information may result in a breach of the school's duty of care to the student.

10. ENQUIRIES

- 10.1 The principal should be contacted directly should there be any queries about the way the school manages the personal information it holds.

COLLECTION NOTICE

1. The school collects personal information, including sensitive information about pupils and parents or guardians before and during the course of a pupil's enrolment at the school. The primary purpose of collecting this information is to enable the school to provide Schooling for your son/daughter.
2. Some of the information we collect is to satisfy the school's legal obligations, particularly to enable the School to discharge its duty of care.
3. Certain laws governing or relating to the operation of schools require that certain information is collected. These include Public Health {and Child Protection}* laws.
4. Health information about pupils is sensitive information within the terms of the National Privacy Principles under the Privacy Act. We ask you to provide medical reports about pupils from time to time.
5. The school from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes, other schools, government departments, {Catholic Education Office, the Catholic Education Commission, your local diocese and the parish}* medical practitioners, and people providing services to the School, including specialist visiting teachers, {sports} coaches and volunteers.
6. If we do not obtain the information important to the School, referred to above we may not be able to enrol or continue the enrolment of your son\daughter.
7. Personal information collected from pupils is regularly disclosed to their parents or guardians. On occasions information such as academic and sporting achievements, pupil activities and other news is published in School newsletters, magazines.
8. Parents may seek access to personal information collected about them and their son/daughter by contacting the school. Pupils may also seek access to personal information about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the school's duty of care to the pupil, or where pupils have provided information in confidence.
9. As you may know the school from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. {It may also be disclosed to organizations that assist in the school's fundraising activities solely for that purpose.} We will not disclose your personal information to third parties for their own marketing purposes without your consent.
10. We may include your contact details in a class list and if you do not agree to this you must advise us now.

11. As part of the School's publicity activities there may, on occasion, be situations whereby the School, Catholic Education Office (CE) or local media will take photographs and/or video footage of your child/ren for publication in newspapers, school documents, CEO documents, news items, and/or the School/CEO website. Should you not want your child/ren to feature in such publicity, it is your responsibility to advise the School.

 12. If you provide the school with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the school and why, that they can access that information if they wish and that the school does not usually disclose the information to third parties
- * If appropriate

HOLY SPIRIT SCHOOL EMPLOYMENT COLLECTION NOTICE

1. In applying for this position you will be providing the school with personal information. We can be contacted at Holy Spirit School, Brompton Road, City Beach WA 6015, Tel: {08} 9341 2551; Fax: {08} 9341 4335; email: admin@holyspirit.edwa.net.au
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application.
3. You agree that we may store this information for three {3} months {or for a period of time required to make a decision.}
4. You may seek access to your personal information that we hold about you if you are unsuccessful for the position. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
5. We will not disclose this information to a third party without your consent. / We usually disclose this kind of information to any organization company or individual that we deem important at the time who are assisting us in our decision process.
6. {We are required to {conduct a criminal record check} collect information {regarding whether you are or have been the subject of an Apprehended Violence Order {AVO} and certain criminal offences} under Child Protection law.*}
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish, that the School does not usually disclose the information to third parties and that we may store their information for three {3} months.

HOLY SPIRIT SCHOOL CONTRACTOR / VOLUNTEER COLLECTION NOTICE

1. In applying to provide your services you will be providing Holy Spirit School with personal information.
We can be contacted at Holy Spirit School, Brompton Road, City Beach WA 6015, Tel: {08} 9341 2551; Fax: {08} 9341 4335;
email: admin@holyspirit.edwa.net.au
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for three {3} months {or for a period of time required to make a decision}.
4. Access to this information may be available to you if you ask the School for it.
5. We will not disclose this information to a third party without your consent. / We usually disclose this kind of information to any organization, company or individual that we deem important at the time who are assisting us in our decision process or who need to know in order to provide the service we require.
6. {We are required to {conduct a criminal record check} collect information {regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences} under Child Protection Law.}
7. If you provide us with the personal information of others, we encourage you to inform them you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose the information to third parties.