RATIONALE

Our Lady of Sion College collects and manages personal information relating to students, parents/guardians, staff, contractors, volunteers, visitors and applicants necessary for the effective administration of the College. Information about students and parents/guardians is collected in order to provide efficient communication and support the educational needs and wellbeing of students. As the College Mission asks us to be concerned with justice and truth, collecting health and other personal information pertaining to students and staff is a serious moral, professional and legal responsibility that the College recognises and accepts.

PRINCIPLES

- Collecting, handling, using, storing and disclosing personal and health information of staff and students is compliant with the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988. In relation to health records, the College is also bound by the Health Records Act 2001 (Vic.).

- Privacy protects individuals from harm resulting from misuse of their information and ensures effective service delivery by encouraging full and frank information provision.

- The College annually reviews and updates this Privacy Policy to take account of new laws and technology, changes to the College’s operations and practices and to make sure it remains appropriate to the changing College environment.

• Practising Privacy involves:
  - Managing personal information in an open and transparent way
  - Collecting only information the College needs
  - Informing people of why the College needs the information and how it will be used
  - Disclosing only the information that is necessary for the purpose of serving the College community
  - Providing people with access to their own records
  - Securing information against unauthorised use or disclosure
  - Providing an avenue for concerns regarding the collection and/or use of information collected to be raised and addressed

IMPLEMENTATION

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 College;

• job applicants, staff members, volunteers and contractors; and

• other people who come into contact with the College.
The College 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 provide personal information.

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 College.

Under the Privacy Act and the Health Records Act 2001 (Vic.), the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee.

The College will use personal information it collects 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 individuals, or to which individuals have consented.

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 purposes for which the College 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 College;
- looking after students' educational, social and medical wellbeing;
- seeking donations and marketing for the College; and
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

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 for 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.

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

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, such as newsletters and magazines, which include personal information, may be used for marketing purposes.

The College needs to collect identifiable information to facilitate the delivery of educational and support services, the job application process and to fulfil other obligations and processes. However, some activities and interactions with the College may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

**The College may disclose personal information, including sensitive information, held about an individual to:**

- school service providers, including the Catholic Education Commission of Victoria, (CECV);
- third party service providers that provide educational support services to schools and school systems such as the Integrated Catholic Online Network system (ICON)
- another College to facilitate the transfer of a student;
- government departments;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers, counsellors and sport coaches;
- recipients of College publications, such as newsletters and magazines;
- 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:** The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a College exchange. However, the College 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 College may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

Where personal and sensitive information is retained by the CECV by a cloud service provider to facilitate HR and staff administrative support, this information will be stored on servers located within Australia. This includes the integrated Catholic Online Network (ICON) system.

**Treating 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 staff is 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 and the Health Records Act 2001 (Vic.), 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 College 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 the personal information of students

The College respects every parent's 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.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the College 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 complain that you believe that the College has breached the Australian Privacy Principles please contact the College 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.

Storage and Protection of Personal and Sensitive Information

- All collected information at the College will be retained in a secure area as appropriate, and disposed of after use consistent with the Public Record Office Standard
- All electronic data will be maintained, stored, transmitted and password protected in accordance with Privacy requirements
- All staff at the College will be provided with up to date professional development in relation to Privacy and will be made aware of their individual and collective duty of care regarding Privacy
• All records will be maintained and kept up to date by relevant staff
• All requests (including requests by staff) for information stored at College must be made to the principal or principal’s delegate
• Under no circumstances will personal private information be provided to unauthorised people