



Privacy Policy

School Governance

1. PURPOSE

The Cathedral School is committed to respecting your right to privacy and protecting your personal information. The school is bound by the 13 Australian Privacy Principles (APPs) and the *Commonwealth Privacy Act 1988*.

This policy outlines how the school uses and manages personal information. It also describes the sorts of information held and for what purposes, and how that information is collected, held, used and disclosed.

2. SCOPE

This policy applies to all students, parents, staff members and volunteers within the school.

3. ROLES & RESPONSIBILITIES

Position / Title	Area of Responsibility
Principal	<ul style="list-style-type: none">Overseeing the implementation of this procedureEnsuring all privacy complaints are responded to within 30 working days of receipt.
All Staff	<ul style="list-style-type: none">Implement the requirements of this procedure when collecting, holding and disclosing personal information.

4. POLICY

This privacy policy has been developed in accordance with the Australian Privacy Principles and embodies The Cathedral School's commitment to protecting the privacy of personal information. It covers how we collect and handle personal information, including sensitive information.

Sensitive information means personal information that is of a sensitive nature, including 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. Special requirements apply to the collection and handling of sensitive information.



Privacy Policy

School Governance

4.1 Collection of personal information

Personal information including sensitive information is only collected if it is reasonably necessary for, or directly related to, one or more the school's functions and activities. The collection may also be required under Australian law or a court/tribunal order.

For sensitive information, the person to whom the sensitive information relates must consent to the collection, unless the information is required by law or where a permitted general situation exists such as to prevent a serious threat to safety (refer to APP Guideline). In the providing of consent, the school is to ensure:

- The individual is adequately informed before giving consent
- The individual gives consent voluntarily
- The consent is current and specific
- The individual has the capacity to understand and communicate their consent.

Consent obtained can either be expressed or implied consent. Expressed consent is given explicitly, either orally or in writing. This includes a handwritten signature, an oral statement, or use of an electronic medium or voice signature to signify agreement. Implied consent arises where consent may reasonably be inferred in the circumstances from the conduct of the school.

4.2 Types of personal information collected

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

Students & Parents	Job applicants, staff members, volunteers and contractors
<ul style="list-style-type: none">• Details about students and parents and/or guardians ('parents') before, during and after the course of a student's enrolment at the school.• Parents' financial information used for the payment of school accounts.• The school will also exercise its legal right to access the credit history of parents.	<ul style="list-style-type: none">• Employment related information regarding your name, employment history, training and qualifications and contact details.• Personal information is collected of volunteers who assist the school in its functions or conduct associated activities, to enable the school and the volunteers to work together.• Where required by law the school will collect and hold information which identifies students and parents and staff.



Privacy Policy

School Governance

Students & Parents	Job applicants, staff members, volunteers and contractors
	<p>This includes the school's obligations under the <i>Child Protection Act 1999</i> (Qld).</p> <ul style="list-style-type: none">• In some circumstances, the school's handling of employee records is exempt from the APP's pursuant to Section 7B(3) of the <i>Privacy Act 1988</i> (Cth).• Tax File Number – A Tax File Number (TFN) is a unique identifier issued by the Commissioner of Taxation. The school collects Tax File Numbers to make payments of salaries and wages to eligible employee types.

4.3 Methods of Collecting Personal Information

The School will generally collect personal information held about an individual by the following means:

- A completed form or application
- Face to face meetings
- Interviews
- Telephone calls
- Employment applications
- Enrolment applications
- Record of payments
- Emails
- Security surveillance (CCTV)

In some circumstances the school may be provided with information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.

4.4 Purposes for which information is collected, held, used and disclosed

In relation to students and parents, the school's primary purpose of collection is to enable the school to provide schooling for the student. This includes satisfying the needs of parents, the



Privacy Policy

School Governance

needs of the student and the needs of the school throughout the whole period the student is enrolled at the Cathedral School.

Students (past, present and future)

The purposes for which the school uses information of students include:

- To keep students and/or parents informed about matters related to schooling through correspondence, newsletters, magazines, the school's website and social media application.
- To facilitate the school's business operations including the fulfilment of any legal requirements.
- Looking after students' educational, social and medical wellbeing.
- Seeking donations and marketing for the school.
- To satisfy the school's legal obligations and allow the school to discharge its duty of care.
- To analyse the school's educational services and student needs with the view of developing new or improved services.
- Day to day administration.
- For security and risk management purposes including incident investigation, loss prevention and claims management.

The school may also disclose personal information to the following third parties:

- Other educational institutions where a student may seek to be enrolled.
- State or Federal Government Departments or Agencies.
- Medical practitioners.
- Individuals providing services to the school i.e. visiting teachers, counsellors and sports coaches.
- Recipients of school publications such as newsletters and magazines.
- Parents or guardians.
- Anyone else as authorised by the individual to which the personal information relates.
- Any third party as required by law.

Parents and Guardians

If you are a parent, the school may collect, hold, use and disclose your personal information for the following purposes:

- To provide for the educational, social and medical wellbeing of the student to whom you are a parent or guardian.
- To keep parents up to date regarding the progress of schooling of the student to whom they are a parent or guardian.
- To facilitate the school's business operations including the fulfilment of any legal requirements.
- To allow membership to the school's Parent & Friends (P&F) Committee.



Privacy Policy

School Governance

- To provide information about other services that the school and other organisations offer that may be of interest.
- To analyse the school's educational services and student needs with the view of developing new or improved services.
- Day to day administration.
- For security and risk management purposes including incident investigation, loss prevention and claims management.

If the above referred information is not obtained, students may not be able to enrol or continue their enrolment with the school and parents/guardians and past students will not be able to become a member of the past student and/or parent and friends associations.

Job applicants, staff members, and contractors

Personal information of job applicants, staff members and contractors is collected for the purpose of assessing and (if successful) engaging the applicant, staff member or contractor. Personal information can be used for the following purposes:

- To administer contracts of employment or services contract.
- For insurance purposes
- Seeking funds and marketing for the School.
- To facilitate the school's business operations including the fulfilment of any legal requirements (e.g. child protection).

Failure to provide the school with the required personal information may result in the school not progressing with the job application.

Volunteers

The School obtains personal information about volunteers who assist the School in its functions or conduct associated activities, to enable the School and the volunteers to work together.

4.5 CCTV Surveillance

The School uses CCTV surveillance systems to monitor and record activity at The Cathedral School. The school is committed to ensuring that personal information collected by the cameras is dealt within accordance with the Information Privacy Principles contained within the *Information Privacy Act 2009*.

The CCTV systems provide 24 hours video surveillance. The purpose of this monitoring and recording is to ensure a safe and secure environment. The School will only use CCTV footage to personally identify you for security, risk management, loss prevention, and misconduct and incident/complaint investigation purposes as outlined in the CCTV Policy.

Should an incident occur, footage may be provided to the Queensland Police Service for law enforcement purposes. Information will not be given to any other person or agency unless authorised or required by law.



Privacy Policy

School Governance

4.6 Collection of unsolicited information

Sometimes personal information is not sought by the school but is delivered or sent to use by either the individual or a third party without prior request. Where unsolicited information is received by us, we will, within a reasonable period, determine whether that information is directly related to one or more of our functions or activities. If this cannot be determined, the School will destroyed or de-identified the information as soon as practicable, unless the information is otherwise required by law to be retained. If this can be determined we will notify the relevant person of the purpose of collection and our intended uses and disclosures in accordance with the APP's.

4.7 Remaining Anonymous or using a pseudonymity

The School understands that anonymity is an important element of privacy and you may wish to remain anonymous, or use a pseudonym when interacting with the school.

In many cases you will be able to advise us that you wish to remain anonymous or use a pseudonym during your contact with the School, however in circumstances where it is likely we would need to collect your personal information, such as to resolve a dispute or provide you with a service, the School will notify you accordingly at the time of collection.

4.8 Notification of the collection of personal information

To ensure individuals are aware of the collection of personal information and the requirements of this Privacy Policy, notification will be provided through a collection notice at the time of or before the collection, or as soon as reasonably possible after.

The collection notice will include:

- The school's contact details.
- The facts and circumstances of collection.
- If the collection is required or authorised by law.
- The purpose of collection.
- The consequences for the individual if personal information is not collected.
- Any third party disclosure.
- How to access and correct personal information or make a complaint.
- Any overseas disclosures.

The school's collection notice and/or reference to the school's Privacy Policy will be made in the following locations:



Privacy Policy

School Governance

- When collecting personal information from a form or online facility.
- When collecting personal information via telephone or as soon as possible afterwards.
- Located on eCat
- Published on the school's website
- Enrolment forms
- Medical forms
- Staff handbook

And any other instance where the collection of personal information occurs.

4.9 Use or disclosure of personal information

The school may disclose personal information, including sensitive information, held about an individual, only for the purpose for which it was provided or a directly related secondary purpose, to:

- Another school or staff at another school
- Government departments
- Medical practitioners
- People providing educational, support and health services to the School, including specialists visiting teachers, coaches, volunteers, counsellors and providers of learning and assessment tools
- Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority
- People providing administrative and financial services to the School
- Recipients of school publications, such as newsletters and magazines
- Students parents or guardians
- Anyone you authorise the School to disclose information to
- Anyone to whom we are required to disclose the information to by law.

Personal information such as academic and sporting achievements, news and images, may be published to the school community by way of newsletters, magazines, the school website and social media programs including the school's app, Facebook, Twitter and You Tube account.

4.10 Marketing and Fundraising

Marketing and fundraising are essential for the school's growth. Personal information held by the school may be disclosed to organisations that assist in the school's fundraising, for example, the Past Student Association, or, on occasions, external fundraising organisations. The school will not



Privacy Policy

School Governance

disclose personal information to external third parties for marketing purposes without direct consent.

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, may be used for marketing purposes.

Personal information (other than sensitive information) can only be used for direct marketing if:

- The school collected the personal information from the individual.
- The individual would reasonably expect the school to use or disclose the personal information for that purpose.
- The school provides a simple way for the individual to request not to be included in or receive direct marketing communications.
- The individual has not made such a request to the organisation.

Individuals can opt out of direct marketing communications and/or request that their photograph and other personal details not be published in the school publications, website or social media programs by providing a written request to the school's Principal using the contact details available on the school's website.

4.11 Sending Information Overseas

The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or arrange a school tour. However we 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)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The School uses 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 and document/data storage. 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.

4.12 Cloud Storage

Cloud storage is utilised by the School through the following software:



Privacy Policy

School Governance

- Microsoft (Windows, Office, Outlook, OneDrive) - Privacy is built into the infrastructure of Microsoft cloud services – refer to the Microsoft Privacy Policy to see the security and safety features inbuilt into the programs.
- TASS – **TASS.web** uses the Microsoft SQL Server 2008r2 or 2012 database.
- QikKids - QK holds your personal information on servers located in Australia. To view the QikKids Privacy Policy go to the following website - <http://www.qikkids.com.au/qk-technologies-privacy-policy>
- eCat (Schoolbox)– hosted data is securely hosted within the Amazon Web Services (AWS) facility in Australia. Refer to their Privacy Policy - <https://schoolbox.com.au/wp-content/uploads/2016/12/privacy-policy.pdf>
- ERM – Data is hosted by Microsoft Azzure - http://www.ermonline.com.au/Privacy_Policy.cfm
- Rapid Global – <http://www.rapidglobal.com/wp-content/uploads/2017/02/2016-Rapid-Global-Privacy-Policy.pdf>
- Library Databases – database storage of books, DVD's and other reference materials.

Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services.

4.13 Adoption, use or disclosure of government related identifiers

The school will not use or disclose an individual's government related identifier unless it is reasonably necessary to identify the individual or to meet the school's statutory or legal obligations.

The school will not adopt a government related identifier of an individual as its own identifier.

An identifier is a number, letter or symbol, or a combination of any or all of those things that is used to identify the individual or to verify the identity of the individual. Example of government related identifiers includes: Centrelink Reference numbers and Medicare numbers.

4.14 Quality of personal information

Personal information will be stored in the school's secure database management program. Staff entering information are responsible for the accurate recording and monitoring of the data retained to ensure it is accurate, up to date and complete. Parents will be requested to review personal information including medical details prior to major excursions (outdoor education, overseas tours), to confirm the information held is up to date.



Privacy Policy

School Governance

4.15 Security of personal information

The school's staff are required to respect the confidentiality of students and parents' personal information and the privacy of individuals. The school has in place steps to protect the personal information held from misuse, interference and loss from unauthorised access, modification or disclosure. It does this by using various methods including locked storage of paper records and pass-worded and restricted access rights to computerised records.

Secure measures are taken for the storing of information with service providers situated out of Australia (e.g. in the Cloud). The school ensures data is stored on secure web servers with firewall protection in place. Access to systems is password protected, with authentication hosted on the school servers. Passwords are restricted to authorised personnel as outlined in the school's *Delegation Procedure*.

The school does not store any personal information longer than necessary. The school will destroy or de-identify personal information which is no longer needed for any of the purposes of collection and in accordance with the School's record and retention requirements.

4.16 Access to personal information

The school respects every parent's right to make decisions concerning their child's education. Generally, the school will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The 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.

An individual 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. Students will generally have access to their personal information through their parents, but older students may seek access themselves. 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 school's duty of care to the student.

To make a request to access information the school holds about you or your child, please contact the school's Principal in writing. The school may require you to verify your identity and specify what information you require. A fee may be charged to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the school will advise the likely cost in advance.



Privacy Policy

School Governance

On the request of a student, the school may, at its discretion, grant that student access to information held by the 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 only be done when the maturity of the student and/or the student's personal circumstances warranted it.

4.17 Correction of personal information

Individuals may access or seek the correction of any personal information held by the school by contacting the school's administration, via the contact details available on the school's website. Parents are able to view some of the personal information held about them on the school's database via the online portal (Parent Lounge), and are requested to advise when any of this information needs to be updated.

The school will respond to a request to correct a record within 30 calendar days. A response will be provided either by correcting the personal information as requested by the individual, or by notifying the individual of its refusal to correct it. Refusals will be conducted in accordance with APP 13 – Correction of Personal Information.

4.18 Mandatory Reporting

Mandatory reporting provisions come into effect on the 22nd February 2018. Mandatory reporting provisions apply to breaches of 'eligible' data (sensitive, confidential information), where a reasonable person (such as a member of school leadership) would consider that serious harm in forms including:

- Physical
- Psychological
- Reputational
- Economical
- Emotional, and/or
- Financial loss

had been/would likely have been caused to the affected person.

School personnel who become aware of the privacy breach must immediately notify the Principal using the online form – Notification of a Privacy Breach (located on eCat – Staff Information – School Governance). The breach will be assessed in accordance with the school's *Privacy Breach Response Plan*.

Examples of how data breaches may occur



Privacy Policy

School Governance

Data breaches occur in a number of ways. Some examples include:

- Lost or stolen laptops, removable storage devices, or paper records containing personal information
- Hard disk drives and other digital storage media (integrated in other devices, for example, multifunction printers, or otherwise) being disposed of or returned to equipment lessors without the contents first being erased
- Databases containing personal information being ‘hacked’ into or otherwise illegally accessed by individuals outside of the agency or organisation
- Employees accessing or disclosing personal information outside the requirements or authorisation of their employment
- Paper records stolen from insecure recycling or garbage bins
- An agency or organisation mistakenly providing personal information to the wrong person, for example by sending details out to the wrong address, and
- An individual deceiving an agency or organisation into improperly releasing the personal information of another person.

4.19 Enquiries and Complaints

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that we have breached the Australian Privacy Principles please contact the Principal using the contact details available on the school’s website. The School 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.

If you are not satisfied with the school’s response, you are entitled to lodge a ‘Privacy Complaint’ with the Office of the Australian Information Commissioner (OAIC). Please refer to their website for further information - <http://www.oaic.gov.au/>

4.20 Policy review

The school will annually review this policy to ensure it remains appropriate to the changing school environment and complies with legislative requirements.

5.0 REFERENCED & ASSOCIATED DOCUMENTATION

Legislative

- Privacy Act 1988
- Right to Information Act 2009

Procedures

- CCTV Policy



The Cathedral School
of St Anne & St James
T O W N S V I L L E

Privacy Policy

School Governance

- Complaints Management Procedure
- Delegation Procedure
- Employment Collection Notice
- Vehicle GPS Tracking Procedure
- ICT Use Procedure
- Standard Collection Notice

Further Resources

- <http://www.oaic.gov.au/> - Office of the Australian Information Commissioner
- Privacy Compliance Manual – Independent School’s Council of Australia and National Catholic Education Commission.