



St Norbert  
College

# Privacy Policy

## RATIONALE

The Catholic Education Commission of Western Australia (CECWA) acknowledges that all children are unique, and that Catholic schools have a responsibility in the development of the whole child in a way that respects and protects that uniqueness.

The CECWA also acknowledges that parents and/or guardians are partners with schools in the education of children, and that trust and respect for the dignity of the child and family require that standards are observed in the management of any information revealed about the child or family.

Schools are required under Privacy Act legislation to ensure, where confidential information is collected, that it is managed in such a way as to preserve the dignity of those involved and to maintain confidentiality.

## YOUR PRIVACY IS IMPORTANT

This Privacy Policy sets out how St Norbert College manages personal information provided to or collected by it.

The College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988.

We may, from time to time, review and update 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 school environment.

## WHAT KINDS OF PERSONAL INFORMATION DOES THE COLLEGE COLLECT AND HOW DOES THE COLLEGE COLLECT IT?

The nature and type of personal information the College collects in the normal course of its operations is largely dependent upon whose information it is collecting and the reasons for collecting it.

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

- pupils and parents and/or guardians ('Parents') before, during and after the course of a pupil's enrolment at the College;
- job applicants, staff members, volunteers and contractors;

- other people who come into contact with the College.

**Personal Information you provide:** If it is reasonable and practical to do so, the College will collect personal information directly from the individual concerned. In the case of students it is reasonable that the majority of personal information will be collected from the Parents.

The College will generally collect personal information held about an individual by way of specifically designed forms filled out by Parents or pupils, face-to-face meetings and interviews, emails and telephone calls.

**Personal Information provided by other people:** 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 school.

**Unsolicited information:** In some circumstances the College, may receive personal information even though it has not sought that information: this is known as ‘unsolicited information’. In those instances where the College has received unsolicited information it will only hold, use and/or disclose that information if it could otherwise do so had the College collected it in accordance with this Privacy Policy. Where that unsolicited information could not have been collected by the means outlined in this Privacy Policy then the College will take steps to destroy, permanently delete or de-identify the information.

**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 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.

## HOW WILL THE COLLEGE USE THE PERSONAL INFORMATION YOU PROVIDE?

The College will use personal information it collects from you to carry out the reasonable expectations of our day to day operations. This is regarded as the “primary purpose”. The College may also use the personal information for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

**Pupils and Parents:** In relation to personal information of pupils and Parents, the College’s primary purpose of collection is to enable us to provide schooling to pupils enrolled at the school, exercise our duty of care, and perform necessary associated administrative activities, which will enable pupils to take part in all the activities of the school. This includes satisfying the needs of Parents, the needs of the pupil and the needs of the College throughout the whole period the pupil is enrolled here.

The purposes for which the College uses and exchanges your information so that we can undertake and perform various functions including, but not limited to:

- Provide education, pastoral care, extra-curricula and health services;
- Satisfy its legal obligations including duty of care and child protection obligations;
- Keep Parents informed about matters related to their child’s schooling, through correspondence (written and electronic), newsletters and magazines;
- Day-to-day administration of the College;
- Looking after students’ educational, social and medical wellbeing;
- Market, promote and undertake fundraising activities;
- Support the activities of College associations such as the Parent Committee, SNESA and the like;
- Improve our day to day operations including training of staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis.

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

**Job applicants and contractors:** In relation to personal information of job applicants and contractors, the College'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 the College 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 College; and
- satisfying 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 pupils 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 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. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

## WHO MIGHT THE COLLEGE DISCLOSE PERSONAL INFORMATION TO AND STORE YOUR INFORMATION WITH?

The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- another school;
- government departments;
- medical practitioners;
- people providing educational, support and health services to the College, including specialist visiting teachers, [sports] 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 College;
- 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 or authorised 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 school 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 use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications, graphic design concepts for print and digital publications.

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

## **HOW DOES THE COLLEGE TREAT 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's staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information we hold 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 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 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 PUPILS**

The College respects every Parents 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.

The College will seek consent of parents before the exchange of information occurs. This may include, requests for external reports such as psychology/DCP etc.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the 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 make a complaint that you believe that the College has breached the Australian Privacy Principles, you may do so in writing to the 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.

## **CHANGES TO OUR PRIVACY AND INFORMATION HANDLING PRACTICES**

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website ([www.norbert.wa.edu.au](http://www.norbert.wa.edu.au)) for a current copy.

## **REVISION**

<b>Version</b>	1.1
<b>Modified Date</b>	7 July 2019
<b>Modified by</b>	Simon Harvey
<b>Modifications</b>	Alignment to CEWA 'Privacy Compliance Manual'