Privacy Guidelines 2013

Legislative Framework

Santa Sabina College is bound by the National Privacy Principles in the federal Privacy Act 1998 and the College requires all staff members to comply with this legislation. These Guidelines are not intended to create any rights or obligations beyond those stipulated in the legislation. The Guidelines will be reviewed regularly to ensure practices and procedures meet changes in law and technology.

Purposes

The College recognises our responsibility to maintain the privacy of individuals and families in the school community. We are committed to ensuring that our practices and processes protect the privacy of members of our community who provide us with, or from whom we collect, information. That information is collected, used and managed with the dignity of the individual in mind and for the primary purpose of schooling.

Use of Personal Information

The College collects and holds personal information, including sensitive information about:

- Pupils, parents and/or guardians during and after the course of a student’s enrolment at the College.
- Job applicants, staff members, volunteers and contractors.
- Other people who come into contact with the school personal information is collected when Parents/Guardians and students complete forms, through face-to-face meetings, telephone conversations and interviews.

Personal information may be revealed by a student during the course of a lesson. In some circumstances information may be provided by a third party e.g. reference, medical report. The National Privacy Principles (NPP) of the Privacy Act does not apply to employee records. However, the confidentiality of individual records is maintained. The College’s primary purpose of collection is to enable the provision of schooling for our pupils. This includes responding to both the needs of the parents and of the pupil throughout the period of enrolment. Personal information is also used for secondary purposes that are reasonably related to the primary purpose of collection and reasonably expected, or to which you have consented.
Parents and Pupils

The College use of personal information of parents and pupils includes:

1. Keep parents informed about their child’s schooling through correspondence, newsletters, magazines.
2. Day to day administration.
3. Looking after a pupils’ educational, social and medical well-being.
4. Seeking donations and marketing for the school.
5. Pastoral and community events and networks.
6. To satisfy the school’s legal obligation and allow the College to discharge its duty of care. In some cases where the College requests personal information about a pupil or Parent, if the information requested is not obtained, the school may not be able to enrol or continue the enrolment of the pupil.

Job Applicants, Staff Members and Sub-Contractors

In relation to the personal information of job applicants, staff members and contractors our primary purpose of collection is to assess (and if successful) engage the applicant, staff member and sub-contractor.

The purpose of using the personal information of job applicants, staff members and contractors includes:

- Administering the individual’s employment contract, as the case may be;
- For insurance purposes;
- Seeking funds and marketing for the school
- Satisfying the College’s legal obligations (e.g. Child Protection)

Volunteers

The College also obtains personal information about volunteers who assist the school or conduct associated activities such as the P & F and Ex-Students’ Association to enable the school and the volunteers to work together.

Fund-raising & Marketing

Fund-raising and marketing are important initiatives in the life of the College in order for the College to continue to provide pupils and staff with a quality learning environment. Parents, staff, contractors and other members of the wider College Community may from time to time receive fund raising information. School publications like Veritas Voice and the flyers from Middle School, Tallong and Mary Bailey House which include personal information, may be used for marketing. Personal information held by the College may be disclosed to organisations that assist in the College’s fund-raising activities, e.g. Ex-Students’ Association, Foundation. The College reserves the right to publish to members of our community, and for the purposes of promoting the College, any photographs taken in the normal course of the
College’s operations unless a member of our community has directed the College not to do so.

**Disclosure of Information**

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

1. Another school.
2. Government departments.
3. Medical practitioners.
4. Your local parish.
5. People providing services to the College including specialists, consultants, visiting teachers, sports and other coaches.
6. Recipients of school publications like newsletters and magazines.
7. Parents.
8. Anyone you authorise the school to disclose the information to.

The College will not send information outside Australia without obtaining your consent or otherwise complying with the National Privacy Principles.

**Sensitive Information**

At times the College collects or is provided with information that is termed “sensitive” under the Act. This information relates to a person’s racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record and health information.

Sensitive information will be used and disclosed only for the purpose for which it was provided or for a directly related secondary purpose, unless you agree otherwise or the use or disclosure of the sensitive information is allowed by law. In handling sensitive information the College also has regard for our duty of care and the pastoral needs of families in our community.

**Management & Security of Personal Information**

In being sensitive to the privacy of members of our community the College has in place steps to protect the personal information that the school holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage for paper records and pass worded access rights to computerised records. In accord with the National Privacy Principles the College does not store personal information longer than necessary. The College endeavors to ensure that the personal information it holds is accurate, complete and up-to-date. Individuals wishing to update personal information held by the College can do so by contacting the Secretary to the College Principal at any time during school office hours. Student information is stored for seven years after completion of their final year at the College.
Access – to check and update details

An individual has the right to access their personal details held by the College and to advise the College of any perceived inaccuracy. National Privacy Principle 6 sets out some exceptions to this right. Pupils will generally have access to their personal information through their parents but older pupils may seek access themselves.

To make a request to access any information the school 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.

Consent and Rights of Access to the Personal Information of Pupils

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 pupil to the pupil’s Parents.

The College will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

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 pupil.

The College may, at its discretion, on the request of a pupil grant that pupil access to information held by the College about them, or allow a pupil 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 pupil and/or the pupil’s personal circumstances so warranted.

You may seek access to the personal information the College holds about you

Under the Commonwealth Privacy Act, an individual may seek access to personal information which the College holds about them. There are some exceptions to this set out in the Act. Pupils will generally have access to their personal information through their Parents, but older pupils may seek access themselves.

To make a request to access any 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.
Enquiries

If you would like further information about the way the College manages the personal information it holds, please contact the College Principal.

The College refers to the Privacy Compliance Manual, provided by the National Catholic Education Commission and National Council of Independent Schools’ Associations and authored by Minter Ellison Lawyers, for further interpretation of these guidelines.