



POLICY

St Rita's College ('the College') is bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). The College may, from time to time, review and update this policy to take account of new laws and technology, changes to College operations and practices and to make sure it remains appropriate to the changing environment.

This policy does not include information pertaining to educational attainment of students which is covered by other legislative requirements.

RATIONALE

This policy outlines how the College will manage personal information provided to or collected by us.

SCOPE

This policy applies to all members of the College community.

CONDITIONS

1. What kind of personal information does the College collect and how does the College collect it?

The type of information the College collects and holds includes personal information. Examples of personal information the College may collect include:

- **students:** full name, date of birth, contact details (next of kin), previous school reports and videos and photos at College events.
- **Parents/guardians:** full name, marital status and contact details, occupation and employer.
- **job applicants, staff members, volunteers and contractors:** full name, education details, employment history, tax file number and contact details.
- **St Rita's College Board of Directors and Committee members:** full name and contact details.
- **other people who come in contact with the College:** full name and contact details.

The type of information the College collects and holds may also include personal information that is sensitive information. Examples of sensitive information the College may collect include:

- **students:** ethnic origin, religious affiliation, disability and medical information.
- **Parents/guardians:** ethnic origin and religious affiliation.
- **job applicants, staff members, volunteers and contractors:** religious affiliation, disability and medical information.
- **College Board of Directors and Committee members:** religious affiliation.

In referring to 'sensitive information', the College means information about a person's racial or ethnic origin, political opinions, religious beliefs or affiliations, trade union or other professional or trade association membership, membership of a political association, sexual orientation or criminal record, that is also personal information, and health information about an individual.



1.1. Personal Information provided

The College will generally collect personal information about an individual by way of forms filled out by parents/guardians or students, face-to-face meetings, interviews, emails and telephone calls. On occasions people other than parents/guardians and students provide personal information. The College also collects personal information from individuals using on-line forms through the College website.

1.2. 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. The College will only collect sensitive information from a third party if it would be unreasonable or impracticable to collect the information from the person.

1.3. Exception in relation to employee records

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 the employee.

2. How will the College use the personal information provided?

The College will use personal information provided by individuals or which it collects from an individual 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 the individual, or to which the individual has consented.

2.1. Students and parents

In relation to personal information of students and parents/guardians, the College's primary purpose of collection is to enable the College to provide schooling for the student, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all of the activities of the College. This includes satisfying both the needs of parents/guardians and the needs of the student throughout the whole period the student is enrolled at the College.

The purposes for which the College uses personal information of students and parents/guardians include:

- to keep parents/guardians informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of the College;
- looking after a student's educational, social and medical well-being;
- seeking donations and volunteers, 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/guardian, if the information requested is not obtained, 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.



2.2. 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:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes; and
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

2.3. Volunteers

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as those of the Parents and Friends Association or the Alumnae Association, to enable the College and the volunteers to work together.

2.4. Marketing and fundraising

The College treats marketing, fundraising and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to be a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising, for example, Parents and Friends Association or Alumnae Association.

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

3. Who might the College disclose personal information to?

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

- another school and relevant staff at those schools;
- government departments;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers and sports coaches;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- recipients of College publications, like newsletters and magazines;
- parents/guardians;
- anyone an individual has authorised the College to disclose information to; and
- anyone to whom the College is required to disclose the information to by law.



3.1. Outsourcing

The College may work with third parties to provide some types of technological support that may require access to the systems that contain personal information. These companies are subject to strict controls that protect personal information from unauthorised use or disclosure and limit their access to personal information to the extent necessary to do their jobs.

3.2. Sending information overseas

The College may disclose personal information about an individual to overseas recipients, 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 and education and assessment applications. 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.

3.3. Outstanding payments

In some circumstances, the College may need to refer overdue debts to debt collectors or solicitors. In doing this the College will give access only to the personal information required to handle the debt.

4. How does the College treat sensitive information?

Sensitive information will be used and disclosed only for the purpose for which it was provided or collected or a directly related secondary purpose, unless the individual agrees otherwise, or the use or disclosure of the sensitive information is required by law.

5. Management and security of personal information

The College's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

The College stores personal information in a combination of computer storage facilities, paper based files and other records. In doing so, the College uses all reasonable efforts to ensure any personal information the College holds is protected from misuse, loss, unauthorized access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

The College adheres to The Privacy Amendment (Notifiable Data Breaches) Act 2017. The College will take all reasonable steps to rectify any privacy breaches. In circumstances where we believe an eligible data breach has occurred we will notify affected individuals, as well as the Information Commissioner. The notification will include:

- a description of the eligible data breach;
- the kind or kinds of information concerned;
- remedial action undertaken by the College; and
- recommendations about steps the individual should take in response to the data breach.



6. 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 have access to their personal information through their parents/guardians, but older students (i.e. Year 11 and Year 12) may seek access themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access any personal information the College holds about an individual or a student, please contact the College Principal in writing. The Principal's contact details appear below under the heading "Enquiries". The College may require the individual to verify their identity and specify what information is required. Depending on the extent of the information required, the College may charge a fee to cover the cost of verifying the 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 the College cannot provide an individual with access to that information, the College will provide the applicant with written notice explaining the reasons for refusal.

6.1. Updating personal information

The College endeavours to ensure that the personal information it holds is accurate, complete and up to date. An individual may seek to update their personal information held by the College by contacting the College Principal at any time.

The Australian Privacy Principles require the College not to store personal information longer than necessary.

7. Consent and rights of access to the personal information of students

The College respects every parent's/guardian'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 students' parents/guardians. The College 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.

As mentioned above, parents/guardians 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/guardians. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.



8. Complaints

If an individual wishes to make a complaint about the College's collection, use or disclosure of personal information under this Privacy Policy please contact the College Principal, whose contact details appear below under the heading "Enquiries".

The College will respond to all complaints within 30 days of receiving the complaint. The College's response will confirm whether there has been a breach of the Australian Privacy Principles by the College. If there has been a breach, the response will provide detailed information on what action the College has taken to rectify the breach.

If an individual believes the College's response is unsatisfactory, or if the College fails to respond within 30 days of receipt of the complaint, a request to review the complaint can be made. If the individual remains unsatisfied they may lodge a further complaint with the Office of the Australian Information Commissioner at www.oaic.gov.au.

9. Enquiries

For further information about the way the College manages the personal information it holds, please contact the College's Principal.

Mail: 41 Enderley Road, Clayfield, 4011

Email: principal@stritas.qld.edu.au

Phone: (07) 3862 1615

10. Review

This policy will be reviewed every three (3) years or as necessitated by legislation.



PRIVACY POLICY

ACCOUNTABILITY

Role	Responsible for
Board	Oversight
Principal	Privacy Policy, Implementation and Complaints
Business Manager	Policy review and updates

ASSOCIATED DOCUMENTS

Description	Document Type
Privacy Guidelines (Internal Use)	Guideline

GLOSSARY OF TERMS

Term (Listed Alphabetically)	Definition
Eligible Data Breach	An eligible data breach arises when the following three criteria are satisfied: <ol style="list-style-type: none"> 1. There is unauthorised access to or unauthorised disclosure of personal information, or a loss of personal information, that an entity holds. 2. This is likely to result in serious harm to one or more individuals, and 3. The entity has not been able to prevent the likely risk of serious harm with remedial action.
Health Information	A subset of sensitive information. It is any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided, currently or in the future, to an individual that is also personal information.
Personal Information	Information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not. It includes all personal information regardless of its source.
Sensitive Information	A type of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record.

REVIEW AND APPROVAL

Version	Author	Authorisation	Approval Date	Next Review
1.0	D Morrow	Board	20 March 2018	2021
N/A	D Morrow	Board	17 June 2014	2017