



Catholic Education Western Australia Limited ACN 47 634 504 135 ('CEWA') is the owner and governing body of the System of Western Australian Catholic schools of which St Clare's is a member.

References to CEWA includes St Clare's, other CEWA schools and offices, staff and volunteers.

This Policy describes how Catholic Education Western Australia ('We') manage personal information provided to or collected by us.

We are 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 our operations and practices and to make sure it remains appropriate to the changing education environment.

As with all decisions concerning children, the best interests of the student are a primary and overriding consideration in the management of information. A student's right to safety prevails above all other considerations, including theirs and others' right to privacy

#### **What kinds of personal information do we collect and how do we collect it?**

The type of information we collect and hold includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents, guardians and caregivers (**Parents**) before, during and after the course of a student's enrolment including:
  - name, contact details (including next of kin), date of birth, previous school and religion;
  - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
  - conduct and complaint records, or other behaviour notes, and school reports;
  - information about referrals to government welfare agencies;
  - counselling reports;
  - health fund details and Medicare number;
  - bank account and credit card details
  - any court orders;
  - volunteering information; and
  - photos and videos at school events;
- job applicants, staff members, volunteers and contractors, including:

- name, contact details (including next of kin), date of birth, and religion;
  - information on job application;
  - opinions from referees, past employers or colleagues
  - professional development history;
  - salary and payment information, including superannuation details;
  - medical information (e.g. details of disability and/or allergies, and medical certificates);
  - complaint records and investigation reports;
  - leave details;
  - photos and videos at school events;
  - workplace surveillance information;
  - work emails and private emails (when using work email address) and Internet browsing history; and
- other people who come into contact with CEWA, including name and contact details and any other information necessary for the particular contact.
  - Staff and governing bodies of order accountable schools who are members of CEWA.

**Personal Information you provide:** We will generally collect personal information held about a person 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 e.g. employment applicants.

**Personal Information provided by other people:** In some circumstances we may be provided with personal information about a person from a third party, for example a report provided by a medical professional or a reference from another school or employer.

**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 our treatment of an employee record, where the treatment is directly related to a current or former employment relationship with CEWA.

#### **How will we use the personal information you provide?**

We will use personal information we collect from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

**Students and Parents:** In relation to personal information of students and Parents, our primary purpose of collection is to enable us to design and safely delivery the educational programme to each student in their community of faith, and for all necessary and associated administrative and governance activities, which will enable students to take part in all the activities of the school. This includes satisfying the needs of Parents, the needs of the student and the needs of CEWA throughout the whole period the student is enrolled.

The purposes for which we use personal information include:

- to keep Parents informed about matters related to their child's education, through correspondence, newsletters and magazines;
- day-to-day administration;

- looking after students' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the school;
- informing continuous improvement; and
- to satisfy our legal obligations and allow the principal to discharge their duty of care.

In some cases where we request personal information about a student or Parent, if the information requested is not obtained, we 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 and contractors:** In relation to personal information of job applicants and contractors, our 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 we use personal information of job applicants and contractors include:

- administering the employment or contract, as the case may be;
- for insurance;
- seeking funds and marketing for school; and
- satisfying our legal obligations, for example, in relation to child protection legislation.

**Volunteers and Visitors:** We collect personal information about volunteers who assist us in our functions or conduct associated activities, such as the school board and Parents and Friends, to enable us to work together. We collect personal information about visitors to ensure their protection and security, and that of our students, staff and premises.

**Marketing, fundraising and continuous improvement:** We treat marketing, seeking donations and feedback for the future growth and development of CEWA as important parts of ensuring that schools and CEWA continue to be a quality learning environment in which both students and staff thrive. Personal information held by us may be disclosed to an organisation that assists in our fundraising or to inform our continuous improvement. It may also be used to celebrate student achievements with the wider community.

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.

**CEWA System:** As CEWA is made up of its schools, any CEWA principal or staff member may use personal information for the purpose for which it was originally collected as described in this Policy, regardless of what principal or office collected it. This allows CEWA to meet its registration and funding obligations and to be supported by the resources, knowledge and expertise across CEWA to allow continuous improvement.

#### **Who might we disclose personal information to and store your information with?**

We may disclose personal information, including sensitive information, held about a person for educational, administrative and support purposes. This may include:

- other schools and teachers at those schools;
- staff and governing bodies of order accountable schools who are members of CEWA;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services, including specialist visiting teachers, coaches, volunteers, and counsellors;

- providers of specialist advisory services and assistance to the School, including in the areas of human resources, information and communication technology, child protection and students with disability;
- providers of learning and assessment tools;
- people participating in, ancillary or incidental to, digital communication such as Teams video
- 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);
- people providing administrative and financial services to the School;
- recipients of School publications, such as newsletters and magazines;
- students' parents, guardians or caregivers;
- anyone you authorise CEWA to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

***Sending and storing information overseas:*** We may disclose personal information about a person to overseas recipients, for instance, to facilitate a school exchange. However, we will not send personal information about a person outside Australia without:

- obtaining the consent of the person (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles

We may use online or 'cloud' service providers to store personal information and to provide services that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users accessing 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.

An example of such a cloud service provider is Microsoft which provides applications, and stores and processes limited personal information for this purpose. CEWA and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering such software and ensuring its proper use.

### **How do we treat sensitive information?**

In referring to 'sensitive information', it 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**

Our systems and staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of every person.

We have staff, policies, processes, software and hardware 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 digital records.

### **Access and correction of personal information**

A person has the right to seek and obtain access to any personal information which we hold about them and to advise us of any perceived inaccuracy. There are some exceptions to this right set out in the Privacy Act. Students will generally be able to access and update their personal information through their Parent. Students over the age of 15 may seek access and correction themselves and may be consulted if a parent seeks non-routine access.

To make a request to access or to update any personal information we hold about you or your child, please contact the principal or CEWA by telephone or in writing.

We may require you to verify your identity and specify what information you require. We 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, we 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**

We respect every Parent's right to make decisions concerning their child's education.

Generally, we will refer any requests for consent and notices in relation to the personal information of a student to their Parents. We 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.

Parents may seek access to personal information held by us about them or their child by contacting the principal by telephone or in writing. However, there may be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable effect on the privacy of others, or where the release may result in a breach of the principal's duty of care to the student.

We may, at our discretion, on the request of a student grant that student access to information held by us 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 warrant it.

### **Enquiries and complaints**

If you would like further information about the way we manage the personal information we hold, or wish to complain that you believe we have breached the Australian Privacy Principles, please contact the Principal by writing or telephone or the Catholic Education Office. We will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.