



PRIVACY POLICY

Introduction

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

Background

Penola Catholic College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. In relation to health records, Penola Catholic College is also bound by the Health Records Act 2001.

Penola Catholic College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Penola Catholic College's operations and practices and to make sure it remains appropriate to the changing school environment.

What kinds of personal information does Penola Catholic College collect and how does Penola Catholic College collect it?

The type of information Penola Catholic 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 Penola Catholic College;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with Penola Catholic College.

Personal Information you provide

Penola Catholic College will generally collect personal information held about an individual by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and pupils provide personal information.

Personal Information provided by other people

In some circumstances Penola Catholic 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.

Exception in relation to employee records

Under the Privacy Act and Health Records Act 2001/Health Records Regulations 2012, the Australian Privacy Principles do not apply to an employee record. As a result, this

Privacy Policy does not apply to Penola Catholic College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Penola Catholic College and employee.

How will Penola Catholic College use the personal information you provide?

Penola Catholic College will use personal information it collects 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 by you, or to which you have consented.

Pupils and Parents

In relation to personal information of pupils and Parents, Penola Catholic College's primary purpose of collection is to enable Penola Catholic College to provide schooling for the pupil. This includes satisfying the needs of Parents, the needs of the pupil and the needs of Penola Catholic College throughout the whole period the pupil is enrolled at Penola Catholic College.

The purposes for which Penola Catholic College uses personal information of pupils and Parents include:

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of Penola Catholic College;
- looking after pupils' educational, social and medical wellbeing;
- seeking donations and marketing for Penola Catholic College; and
- to satisfy Penola Catholic College's legal obligations and allow Penola Catholic College to discharge its duty of care.

In some cases where Penola Catholic College requests personal information about a pupil or Parent, if the information requested is not provided, Penola Catholic 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, staff members and contractors

In relation to personal information of job applicants, staff members and contractors, Penola Catholic 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 Penola Catholic College uses personal information of job applicants, staff members and contractors include:

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

Volunteers

Penola Catholic College also obtains personal information about volunteers who assist Penola Catholic College in its functions or conduct associated activities, such as Penola Catholic College Collegian's and Penola Catholic College Parents and Friends, to enable Penola Catholic College and the volunteers to work together.

Marketing and fundraising

Penola Catholic College treats marketing and seeking donations for the future growth and development of Penola Catholic College as an important part of ensuring that Penola Catholic College continues to provide a quality learning environment in which both pupils and staff thrive. Personal information held by Penola Catholic College may be disclosed to organisations that assist in Penola Catholic College's fundraising, for example, as Penola Catholic College Collegians' and Penola Catholic College Parents and Friends.

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.

Who might Penola Catholic College disclose personal information to and store your information with?

Penola Catholic College may not use or disclose information about an individual other than in specified circumstances. Under these specified circumstances Penola Catholic College may disclose personal information, including sensitive information, held about an individual to:

- another school;
- government departments;
- medical practitioners;
- people providing services to Penola Catholic College, including specialist visiting teachers,
- counsellors and sports coaches;
- recipients of School publications, such as newsletters and magazines;
- parents;
- anyone you authorise Penola Catholic College to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

Sending and storing information overseas

Penola Catholic College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Penola Catholic 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 currently uses an online psychology testing service, which resides in Canada.

Where personal and sensitive information is retained by the CECV by a cloud service provider to facilitate HR and staff administrative support, this information will be stored on servers located within Australia. This includes the integrated Catholic Online Network (ICON) system.

How does Penola Catholic College treat sensitive information?

In referring to 'sensitive information', Penola Catholic 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

Penola Catholic College's staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

Penola Catholic College has in place steps to protect the personal information Penola Catholic College holds 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 Health Records Act 2001 / Health Records Regulations 2012, an individual has the right to obtain access to any personal information which Penola Catholic College holds about them and to advise Penola Catholic College of any perceived inaccuracy. Pupils will generally be able to access and update their personal information through their Parents, but older pupils 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 Penola Catholic College holds about you or your child, please contact the Principal in writing. Penola Catholic College may require you to verify your identity and specify what information you require. Penola Catholic 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, Penola Catholic 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

Penola Catholic College respects every Parent's right to make decisions concerning their child's education. Generally, Penola Catholic College will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. Penola

Catholic 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.

As mentioned above, parents may seek access to personal information held by Penola Catholic 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 Penola Catholic College's duty of care to the pupil.

Penola Catholic College may, at its discretion, on the request of a pupil grant that pupil access to information held by Penola Catholic 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.

Enquiries and complaints

If you would like further information about the way Penola Catholic College manages the personal information it holds, or wish to complain that you believe that Penola Catholic College has breached the Australian Privacy Principles please contact the Principal. Penola Catholic 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.