Melbourne Archdiocese
Catholic Schools

Queen of Peace Primary School Privacy Policy and Procedures

Queen of Peace Primary School is a school which operates with the consent of the Catholic Archbishop of Melbourne and is owned, operated and governed by Melbourne Archdiocese Catholic Schools Ltd (MACS).

Purpose

This policy sets out how personal information provided to or collected by Queen of Peace Primary School is managed, to ensure Queen of Peace Primary School acts in accordance with relevant legislative requirements.

Scope

This policy applies to information held and acquired byQueen of Peace Primary School.

Principles

Queen of Peace Primary School will apply a number of principles in collecting and managing personal information. It will:

- manage personal information in an open and transparent way.
- only collect personal information that is reasonably necessary for the school's functions or activities.
- use fair and lawful means to collect personal information.
- obtain consent to collect sensitive information unless specified exemptions apply.
- take reasonable steps to protect the personal information the school holds from misuse, interference and loss and from unauthorised access, modification or disclosure.
- only use or disclose personal information for the primary purpose of collection unless an exception applies.

Policy

The school collects and holds personal information, including health and other sensitive information about students, parents /guardians/carers and others, who come into contact with the school.

The school will generally collect personal information held about an individual by way of:

- forms filled out by parents / guardians / carers or students
- face-to-face meetings and interviews
- emails and telephone calls

through the school's online portal or application.

Queen of Peace Primary School will use personal information it collects from parents / guardians / carers 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 consented to, by parents / guardians / carers.

Queen of Peace Primary School ensures that personal information is stored securely and that access is provided only to persons who need such access. Depending on the nature of the personal information, it may be stored in locked rooms or cabinets (in the case of paper records), on secure digital devices or on the school computer systems with appropriate level of access in place.

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 school's treatment of an employee record where the treatment is directly related to a current or former employment relationship between the school and employee. The school handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001* (Vic.).

Anonymity

The school needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate the delivery of schooling to its students and its educational and support services, conduct the job application process and fulfil other obligations and processes. However, in some limited circumstances some activities and interactions with the school may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

Procedures

What information may be collected by the school?

Student information
Name Contact details (including next of kin) Date of birth Gender Language background Previous school Religion Medical and welfare information (including details of disability and / or allergies and details of any assistance the student receives for that disability and / or allergies, medical reports, Medical reports Cognitive assessments Conduct and complaint records, or other behaviour notes, school attendance, school reports Information about referrals to government welfare agencies Information obtained during counselling Any court orders Photographs and videos at school events
Parent / guardian / carer information
Name Address Contact details Education, occupation, and language background Health fund details Medicare number Any court orders

Volunteer information (including Working with Children Check)

Job applicants, staff members, volunteers, and contractors

Name

Contact details (including next of kin)

Date of birth

Information on job application form

Information provided by a former employer or a referee

Professional development history

Salary and payment information, including superannuation details

Medical information (e.g., details of disability and / or allergies, medical certificates)

Complaint records and investigation report

Employee records

Photos and videos at school events

Workplace surveillance information

Work email and private email (using work email address) and internet browsing history

Other people who come into contact with the school

Name

Contact details

Working with Children Check

Personal information provided by other people

In some circumstances the school 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 type of information the school may collect from another school may include:

- academic records and/or achievement levels
- information that may be relevant to assisting the new school to meet the needs of the student, including any adjustments.

How will the school collect and hold personal information?

Students and parents / guardians / carers

In some cases where the school requests personal information about a student or parent / guardian / carer, if the information requested is not provided, the school may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

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

In particular, the purposes for which the school uses the personal information of students and parents / guardians / carers include:

- to keep parents / guardians / carers informed about matters related to their child's schooling, through correspondence, newsletters and magazines,
- day-to-day administration of the school,
- looking after students' educational, social and medical wellbeing,
- seeking donations and marketing for the school,
- to satisfy the school's legal obligations to discharge its duty of care,
- to satisfy the legal obligations of the school's governing authority – Melbourne Archdiocese Catholic Schools Ltd (MACS) and the Catholic Education Commission of Victoria Ltd (CECV)
- to satisfy the school service providers' legal obligations.

Job applicants and contractors

In relation to the personal information of job applicants and contractors, the school's primary purpose of collection is to assess and (if successful) engage the applicant, or contractor, as the case may be.

The purposes for which the school uses the 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 school
- satisfying the school's legal obligations, for example, in relation to child protection.

Volunteers

The school also obtains personal information about volunteers who assist the school in its functions or conduct associated activities, such as [include the name of any alumni associations].

The purposes for which the school uses the personal information of volunteers includes:

- enabling the school to manage the engagement process of volunteers,
- for insurance purposes,
- satisfying the school's legal obligations, for example, in relation to child protection,
- to confirm their suitability and to manage their visits.

Counsellors

The school contracts with external providers to provide counselling and/or psychology services for some students. The principal may require the counsellor and/or psychologist to inform him or her or other teachers of any issues the principal and the counsellor and/or psychologist believe may be necessary for the school to know for the wellbeing or development of the student who is counselled or other students at the school.

Parish

The school will not disclose any personal information to the school parish to facilitate religious and sacramental programs, or other activities such as fundraising, without consent.

Marketing and fundraising

The school treats marketing and seeking donations for the future growth and development of the school as an important part of ensuring that the school continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the school may be disclosed to organisations that assist in the school's fundraising, for example, the school's foundation or alumni organisation, or on occasion, external fundraising organisations.

Parents / guardians / carers, 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 and sometimes people's images, may be used for marketing purposes.

Who might the school disclose personal information to?

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

- school service providers which provide educational, support and health services to the school, either at the school or off campus,
- people providing educational support such as sports coaches, volunteers, counsellors, sports coaches and providers of learning and assessment tools,
- third party service providers that provide online educational and assessment support services, document and data management services, training and support services, hosting services, and software-as-a-service applications, such as the Integrated Catholic Online Network (ICON) and Google G Suite,
- authorised agencies and organisations to enable the school to discharge its responsibilities, e.g. under the Australian Education Regulation 2013 (Regulation) and the Australian Education Act 2013 (Cth) relating to students with a disability, including Nationally Consistent Collection of Data (NCCD) quality assurance processes, participation in the Australian Early Development Census (AEDC) and government audits,
- authorised organisations and persons who support the school by providing consultative services or undertaking assessments for the purpose of educational programming or providers of health services such as counsellors, psychologists, school nursing services, dental vans. Specific consent is obtained to collect and disclose this type of sensitive and health information as part of a service request which may include release of relevant medical or allied health reports, educational planning and evaluation documents such as personalised learning/behaviour/medical management plans,
- other third parties which the school uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with parents / guardians / carers,
- support the training of selected staff in the use of the school's systems,
- another school including to its teachers to facilitate the transfer of a student,
- federal and state government departments and/or agencies engaged by them,
- health service providers,
- recipients of school publications, such as newsletters and magazines,
- students/parents / guardians / carers and their emergency contacts,
- assessment and educational authorities including the Victorian Curriculum and Assessment Authority (VCAA) and the Australian Curriculum, Assessment and Reporting Authority (ACARA),
- anyone to whom the parent / guardian / carer authorises the school to disclose information,
- anyone to whom the school is required or authorised to disclose the information by law, including under child protection and information sharing laws.

Nationally Consistent Collection of Data on School Students with Disability

The school is required by the Australian Education Regulation 2013 (Cth) and *Australian Education Act 2013* (Cth) to collect and disclose certain information to inform the Students with a Disability (SwD) loading via the NCCD. The school provides the required information at an individual student level to an approved authority. Approved authorities must comply with reporting, record-keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

Sending and storing information overseas

The school may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or a student overseas tour. However, the school will not send personal information about an individual outside Australia without either:

- obtaining the consent of the individual
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The school may from time to time use the services of third-party online service providers (including for the delivery of services and third-party online applications, or apps relating to email, instant messaging and education and assessment, such as Google G Suite and Gmail) which may be accessible by the parent / guardian / carer. Some personal information, including sensitive information, may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.

School personnel and the school's 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 the system and services ensuring their proper use.

The school makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed and stored outside Australia, in connection with any cloud and third-party services and will endeavour to ensure the cloud is located in countries with substantially similar protections as the Australian Privacy Principles.

The countries in which the servers of cloud service providers and other third-party service providers are located may include:

- Australia

Where personal and sensitive information is retained by a cloud service provider on behalf of the school to facilitate human resources and staff administrative support, this information may be stored on servers located in or outside of Australia.

Otherwise, it is not practicable to specify in this policy the countries in which overseas recipients of personal information are likely to be located.

How does the school treat sensitive information?

In referring to sensitive information, the school 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 the parent / guardian / carer agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The school's staff are required to respect the confidentiality of students' and parents / guardians / carers' personal information and the privacy of individuals.

The school has in place steps to protect the personal information the school holds from misuse, interference and loss, unauthorised access, modification, or disclosure by use of various methods including locked storage of paper records and appropriate security to limit access to digital records.

This includes responding to any incidents which may affect the security of the personal information it holds. If the school assesses that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, we will notify them and the Office of the Australian Information Commissioner of the breach.

Access and correction of personal information

Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information and health records respectively which the school holds about them and to advise the school of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents / guardians / carers, but older students may seek access and correction themselves.

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

To make a request to access or to update any personal information the school holds about parents/guardians/carer or children, please contact the school principal [principal name] or the school administrator [administrator name] by telephone or in writing. The school may require verification of identity and specification of what information is required. The school 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 school will advise the likely cost in advance. If the school cannot provide access to that information, we will provide written notice explaining the reasons for refusal.

There may be circumstances where the reason for refusal is not provided, if doing so may breach the privacy of another person.

Consent and rights of access to the personal information of students

The school respects every parent / guardian / carer's right to make decisions concerning their child's personal information.

Generally, the school will refer any requests for consent and notices in relation to the personal information of a student to the student's parents / guardians / carers. The school will treat consent given by parents /guardians/carers as consent given on behalf of the student and notice to parents / guardians / carers will act as notice given to the student.

Parents / guardians / carers may seek access to personal information held by the school about them or their child by contacting the school principal or 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 impact on the privacy of others, or where the release may result in a breach of the school's duty of care to the student.

The school may, at its discretion on the request of a student, grant that student access to information held by the school about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents / guardians / carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Complaints

If parents / guardians / carers wish to complain that the school has interfered with their privacy because of an alleged breach of the Australian Privacy Principles, they should contact the school principal in writing at:

Principal
School name
School address
Email: principal@qopaltonameadows.catholic.edu.au

The school will investigate the complaint and will notify the parent / guardian / carer of the making of a decision in relation to the complaint as soon as is practicable after it has been made. If the parents / guardians / carers are not satisfied with the school's decision, a complaint in relation to an alleged breach of the Australian Privacy Principles can be made to the MACS Privacy Officer at privacy@macs.vic.edu.au.

MACS Privacy Officer
Melbourne Archdiocese Catholic Schools Ltd
PO Box 3
EAST MELBOURNE 8002
Phone 03 9267 0228 or Email: privacy@macs.vic.edu.au.

MACS will investigate any complaint and notify you of a decision in relation to your complaint as soon as practicable after the decision has been made. If you are not satisfied with MACS' decision, you may make a complaint to the Office of the Australian Information Commissioner (OAIC). Contact details are:

GPO Box 5218, Sydney, NSW 2001
Telephone: 1300 363 992

An online privacy complaint form is available from www.oaic.gov.au.

Related policies and documents

Supporting documents

Standard Collection Notice
Photographic and Recording Permission Form

Related MACS policies and documents

Privacy Policy for MACS Schools
Recordkeeping Policy – Schools

Legislation and standards

Australian Education Act 2013 (Cth)
Australian Education Regulation 2013 (Cth)
Health Records Act 2001 (Vic.)
Privacy Act 2001 (Cth)

Approval Date	10 May 2023
Review Date	May 2025