



# Privacy Policy

## School Governance

### 1. PURPOSE

The Cathedral School is committed to respecting your right to privacy and protecting your personal information. The school is bound by the 13 Australian Privacy Principles (APPs) and the *Commonwealth Privacy Act 1988*.

This policy outlines how the school uses and manages personal information. It also describes the sorts of information held and for what purposes, and how that information is collected, held, used and disclosed.

### 2. SCOPE

This policy applies to all students, parents, staff members and volunteers within the school.

### 3. ROLES & RESPONSIBILITIES

Position / Title	Area of Responsibility
Principal	Overseeing the implementation of this procedure Ensuring all privacy complaints are responded to within 30 working days of receipt.
All Staff	Implement the requirements of this procedure when collecting, holding and disclosing personal information.

### 4. POLICY

This privacy policy has been developed in accordance with the Australian Privacy Principles and embodies The Cathedral School's commitment to protecting the privacy of personal information. It covers how we collect and handle personal information, including sensitive information.

Sensitive information means personal information that is of a sensitive nature, including 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. Special requirements apply to the collection and handling of sensitive information.



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### 4.1 Collection of personal information

Personal information including sensitive information is only collected if it is reasonably necessary for, or directly related to, one or more the school's functions and activities. The collection may also be required under Australian law or a court/tribunal order.

For sensitive information, the person to whom the sensitive information relates must consent to the collection, unless the information is required by law or where a permitted general situation exists such as to prevent a serious threat to safety (refer to APP Guideline). In the providing of consent, the school is to ensure:

- The individual is adequately informed before giving consent
- The individual gives consent voluntarily
- The consent is current and specific
- The individual has the capacity to understand and communicate their consent.

Consent obtained can either be expressed or implied consent. Expressed consent is given explicitly, either orally or in writing. This includes a handwritten signature, an oral statement, or



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Students & Parents

Job applicants, staff members,  
volunteers and contractors

This includes the school's obligations under  
the *Child Protection Act 1999*





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To provide information about other services that the school and other organisations offer that may be of interest.

To analyse the school's educational services and student needs with the view of developing new or improved services.

Day to day administration.

For security and risk management purposes including incident investigation, loss prevention and claims management.

If the above referred information is not obtained, students may not be able to enrol or continue their enrolment with the school and parents/guardians and past students will not be able to become a member of the past student and/or parent and friends associations.

### Job applicants, staff members, and contractors

Personal information of job applicants, staff members and contractors is collected for the purpose of assessing and (if successful) engaging the applicant, staff member or contractor.

Personal information can be used for the following purposes:

To administer contracts of employment or services contract.

For insurance purposes

Seeking funds and marketing for the School.

To facilitate the school's business operations including the fulfilment of any legal requirements (e.g. child protection).

Failure to provide the school with the required personal information may result in the school not progressing with the job application.

### Volunteers

The School obtains personal information about volunteers who assist the School in its functions or conduct associated activities, to enable the School and the volunteers to work together.

## 4.5 CCTV Surveillance

The School uses CCTV surveillance systems to monitor and record activity at The Cathedral School. The school is committed to ensuring that personal information collected by the cameras is dealt within accordance with the Information Privacy Principles contained within the *Information Privacy Act 2009*.

The CCTV systems provide 24 hours video surveillance. The purpose of this monitoring and recording is to ensure a safe and secure environment. The School will only use CCTV footage to personally identify you for security, risk management, loss prevention, and misconduct and incident/complaint investigation purposes as outlined in the CCTV Policy.

Should an incident occur, footage may be provided to the Queensland Police Service for law enforcement purposes. Information will not be given to any other person or agency unless authorised or required by law.



#### 4.6 Collection of unsolicited information

Sometimes personal information is not sought by the school but is delivered or sent to use by either the individual or a third party without prior request. Where unsolicited information is received by us, we will, within a reasonable period, determine whether that information is directly related to one or more of our functions or activities. If this cannot be determined, the School will destroyed or de-identified the information as soon as practicable, unless the information is otherwise required by law to be retained. If this can be determined we will notify the relevant person of the purpose of collection and our intended uses and disclosures in accordance with the APP's.

#### 4.7 Remaining Anonymous or using a pseudonymity

The School understands that anonymity is an important element of privacy and you may wish to remain anonymous, or use a pseudonym when interacting with the school.

In many cases you will be able to advise us that you wish to remain anonymous or use a pseudonym during your contact with the School, however in circumstances where it is likely we would need to collect your personal information, such as to resolve a dispute or provide you with a service, the School will notify you accordingly at the time of collection.



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When collecting personal information from a form or online facility.  
When collecting personal information via telephone or as soon as possible afterwards.  
Located on eCat  
Published on the school's website  
Enrolment forms  
Medical forms  
Staff handbook

And any other instance where the collection of personal information occurs.

#### 4.9 Use or disclosure of personal information

The school may disclose personal information, including sensitive information, held about an individual, only for the purpose for which it was provided or a directly related secondary purpose, to:

- Another school or staff at another school
- Government departments
- Medical practitioners
- People providing educational, support and health services to the School, including specialists visiting teachers, coaches, volunteers, counsellors and providers of learning and assessment tools
- Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority
- People providing administrative and financial services to the School
- Recipients of school publications, such as newsletters and magazines
- Students parents or guardians
- Anyone you authorise the School to disclose information to
- Anyone to whom we are required to disclose the information to by law.

Personal information such as academic and sporting achievements, news and images, may be published to the school community by way of newsletters, magazines, the school website and social media programs including the school's app, Facebook, Twitter and YouTube account.

#### 4.10 Marketing and Fundraising

Marketing and fundraising are essential for the school's growth. Personal information held by the school may be disclosed to organisations that assist in the school's fundraising, for example, the Past Student Association, or, on occasions, external fundraising organisations. The school will not



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### 4.15 Security of personal information

The school's staff are required to respect the confidentiality of students and parents' personal information and the privacy of individuals. The school has in place steps to protect the personal information held from misuse, interference and loss from unauthorised access, modification or disclosure. It does this by using various methods including locked storage of paper records and passworded and restricted access rights to computerised records.

Secure measures are taken for the storing of information with service providers situated out of Australia (e.g. in the Cloud). The school ensures data is stored on secure web servers with firewall protection in place. Access to systems is password protected, with authentication hosted on the school servers. Passwords are restricted to authorised personnel as outlined in the school's *Delegation Procedure*.

The school does not store any personal information longer than necessary. The school will destroy or de-identify personal information which is no longer needed for any of the purposes of



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On the request of a student, the school may, at its discretion, 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. This would only be done when



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Data breaches occur in a number of ways. Some examples include:

Lost or stolen laptops, removable storage devices, or paper records containing personal information

Hard disk drives and other digital storage media (integrated in other devices, for example, multifunction printers, or otherwise) being disposed of or returned to equipment lessors without the contents first being erased

Databases containing personal information being 'hacked' into or otherwise illegally accessed by individuals outside of the agency or organisation

Employees accessing or disclosing personal information outside the requirements or authorisation of their employment

Paper records stolen from insecure recycling or garbage bins

An agency or organisation mistakenly providing personal information to the wrong person, for example by sending details out to the wrong address, and

An individual deceiving an agency or organisation into improperly releasing the personal information of another person.

#### 4.19 Enquiries and Complaints

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that



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Complaints Management Procedure

Delegation Procedure

Employment Collection Notice

Vehicle GPS Tracking Procedure

ICT Use Procedure

Standard Collection Notice

### Further Resources

<http://www.oaic.gov.au/> - Office of the Australian Information Commissioner

Privacy Compliance Manual – Independent School's Council of Australia and National Catholic Education Commission.