



HOLY SPIRIT COMMUNITY SCHOOL

PRIVACY POLICY

This Privacy Policy sets out how Holy Spirit Community School manages personal information provided to or collected by it.

Holy Spirit Community School is bound by the Australian Privacy Principles contained in the Commonwealth *Privacy Act 1988*. In relation to health records, Holy Spirit Community School is also bound by the *Health Records Act 2001 (Vic.)*.

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

What kinds of personal information does Holy Spirit Community School collect and how does Holy Spirit Community School collect it?

The type of information Holy Spirit Community School 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 Holy Spirit Community School;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with Holy Spirit Community School as deemed necessary.

Personal Information you provide: Holy Spirit Community School 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 Holy Spirit Community 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.

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 Holy Spirit Community School's treatment of an employee record unless required by law or organisational policy where the treatment is directly related to a current or former employment relationship between Holy Spirit Community School and employee. Holy Spirit Community School handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001 (Vic.)*

Anonymity: Holy Spirit Community School needs to collect identifiable information to facilitate the delivery of educational and support services, the job application process and fulfil other obligations and processes. However, some activities and interactions with Holy Spirit Community School may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

How will Holy Spirit Community School use the personal information you provide?

Holy Spirit Community School 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, Holy Spirit Community School's primary purpose of collection is to enable Holy Spirit Community School to provide educational and support services for the pupil. This includes satisfying the needs of Parents, the needs of the pupil and the needs of Holy Spirit Community School throughout the whole period the pupil is enrolled at Holy Spirit Community School.

The purposes for which Holy Spirit Community School 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 Holy Spirit Community School;
- looking after pupils' educational, social and medical wellbeing;
- seeking donations and marketing for Holy Spirit Community School; and
- to satisfy Holy Spirit Community School's legal obligations and allow Holy Spirit Community School to discharge its duty of care.

In some cases where Holy Spirit Community School requests personal information about a pupil or Parent, if the information requested is not provided, Holy Spirit Community School 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 and contractors: In relation to personal information of job applicants and contractors, Holy Spirit Community School's 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 Holy Spirit Community School uses 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 Holy Spirit Community School; and
- satisfying Holy Spirit Community School's legal obligations, for example, in relation to child protection legislation.

Volunteers: Holy Spirit Community School also obtains personal information about volunteers who assist Holy Spirit Community School in its functions or conduct associated activities, such as [alumni associations], to enable Holy Spirit Community School and the volunteers to work together.

Marketing and fundraising: Holy Spirit Community School treats marketing and seeking donations for the future growth and development of Holy Spirit Community School as an important part of ensuring that Holy Spirit Community School continues to provide a quality learning environment in which both pupils and staff thrive. Personal information held by Holy Spirit Community School may be disclosed to organisations that assist in Holy Spirit Community School's fundraising, for example, Holy Spirit Community School's Foundation or alumni organisation [or, on occasions, external fundraising organisations].

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 Holy Spirit Community School disclose personal information to and store your information with?

Holy Spirit Community School may disclose personal information, including sensitive information, held about an individual to:

- School service providers, including the Catholic Education Commission of Victoria, (CECV), Catholic Education Offices specialist visiting teachers, counsellors and sports coaches, and other diocese;
- third party service providers that provide educational support services to schools and school systems such as the Integrated Catholic Online Network system (ICON);
- another school to facilitate the transfer of a student;
- government departments;
- medical practitioners;
- recipients of School publications, such as newsletters and magazines;
- student's parents or guardians;
- anyone you authorise Holy Spirit Community School to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law.

Sending and storing information overseas: Holy Spirit Community School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Holy Spirit Community School 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.

If Holy Spirit Community School uses other applications involving 'cloud storage', this clause is relevant. If not, it should be removed.

Holy Spirit Community School may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

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 and the Google Apps for Education. Google is a US company with US Servers who abide by the Australian Privacy Laws.

How does Holy Spirit Community School treat sensitive information?

In referring to 'sensitive information', Holy Spirit Community 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 you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

Holy Spirit Community School's staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

Holy Spirit Community School has in place steps to protect the personal information Holy Spirit Community School 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 and the Health Records Act, an individual has the right to obtain access to any personal information and health records respectively which Holy Spirit Community School holds about them and to advise Holy Spirit Community School 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 Holy Spirit Community School holds about you or your child, please contact Holy Spirit Community School Principal or Administration Officer by telephone or in writing. Holy Spirit Community School may require you to verify your identity and specify what information you require. Holy Spirit Community School 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, Holy Spirit Community School 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

Holy Spirit Community School respects every Parent's right to make decisions concerning their child's education.

Generally, Holy Spirit Community School will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. Holy Spirit Community School 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.

Parents may seek access to personal information held by Holy Spirit Community School about them or their child by contacting the Principal or Administration 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 Holy Spirit Community School's duty of care to the pupil.

Holy Spirit Community School may, at its discretion, on the request of a pupil grant that pupil access to information held by Holy Spirit Community School 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 warrant it.

Enquiries and complaints

If you would like further information about the way Holy Spirit Community School manages the personal information it holds, or wish to complain that you believe that Holy Spirit Community School has breached the Australian Privacy Principles please contact the Principal by writing or by telephone. Holy Spirit Community School 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.

* If Holy Spirit Community School uses applications or programs where the servers are located outside of Australia, Holy Spirit Community School needs to list the countries where this information will be stored.