



Privacy Policy

Context

The first administrative document of the Society of Jesus with respect to the Colleges' apostolate, the Ratio Studiorum, made reference to professional standards more than four centuries ago. From those earliest days care for the individual, respect for the human person and compliance in all codes of law was, and remains central to all Jesuit ministries.

The purpose of the policy is to set out how the College manages personal information provided to or collected by it.

The College:

- / regards the privacy of all members of the community as paramount.
- / The College complies with Commonwealth privacy laws as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Amending Act).
- / The handling of personal information of pupils, parents, employers and others is treated in accordance with the 'Privacy Act'.
- / The College is fully committed to respect all individuals, including adults and children and the wider community.

The College is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (Privacy Act). The College is also bound by the NSW Health Privacy Principles which are contained in the *Health Records and Information Act 2002* (Health Records Act).

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

Principles

WHAT KINDS OF PERSONAL INFORMATION DOES THE COLLEGE COLLECT AND HOW DOES THE COLLEGE COLLECT IT?

Personal information is information or an opinion about an individual from which they can be reasonably identified.



The College may collect and hold personal information, including health and other sensitive information from an individual in their capacity as a student, contractor, volunteer, stakeholder, job applicant, alumni, visitor or other individuals that come into contact with the school.

The College will generally seek consent from the individual in writing before collecting their sensitive information (including health information).

PERSONAL INFORMATION THAT IS PROVIDED BY A MEMBER OF THE COLLEGE COMMUNITY:

The collection of personal information depends on the circumstances in which the College is collecting it. If it is reasonable and practicable to do so, the College will collect personal information directly from the individual.

The 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, CCTV and telephone calls. On occasions people other than parents and pupils provide personal information. Examples of personal information the College may collect in the course of providing services include:

- / **PERSONAL INFORMATION** including names, addresses and other contact details; dates of birth; next of kin details; photographic images; attendance records and financial information.
- / **SENSITIVE INFORMATION** (particularly in relation to student and parent records) including government identifiers (such as TFN), religious beliefs, nationality, country of birth, professional memberships, family court orders and criminal records.
- / **HEALTH INFORMATION** (particularly in relation to student and parent records) including medical records, disabilities, immunisation details and psychological reports.

PERSONAL INFORMATION PROVIDED BY OTHER PEOPLE:

In some circumstances the 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.

UNSOLICITED INFORMATION:

The College may be provided with personal information without having sought it through its normal means of collection.

- / Misdirected postal mail – Letters, Notes, Documents
- / Misdirected electronic mail – Emails, electronic messages
- / Employment applications sent to the College that are not in response to an advertised vacancy
- / Additional information provided to the College which was not requested.

Unsolicited information obtained by the College will only be held, used and or disclosed if it is considered as personal information that could have been collected by normal means. If that



unsolicited information could not have been collected by normal means then the College will destroy, permanently delete or de-identify the personal information as appropriate.

EXCEPTION IN RELATION TO EMPLOYEE RECORDS:

Under the *Privacy Act*, employee records are exempt from the Australian Privacy Principles. As a result, this Privacy Policy does not apply to the College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee.

HOW WILL THE COLLEGE USE THE PERSONAL INFORMATION THAT IS PROVIDED?

The College will use personal information it collects for the primary purpose of providing schooling for pupils enrolled at the College, and secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which the person who provided the information consents.

PUPILS AND PARENTS:

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

The secondary purposes for which the 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 the College;
- / looking after pupils' educational, social and medical wellbeing;
- / seeking donations and marketing for the College; and
- / to satisfy the College's legal obligations and allow the College to discharge its duty of care.

In some cases where the College requests personal information about a pupil or parent, if the information requested is not provided, the 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:

The College's primary purpose of collection of belonging to job applicants, staff members and contractors is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The secondary purposes for which the 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 the College; and
- / to satisfy the College's legal obligations, for example, in relation to child protection legislation.

VOLUNTEERS:

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable the College and the volunteers to work together.

MARKETING AND FUNDRAISING:

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

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

WHO MIGHT THE COLLEGE DISCLOSE PERSONAL INFORMATION TO AND STORE YOUR INFORMATION WITH?

The College may disclose personal information, including sensitive information, held about an individual to:

- / another school;
- / government departments;
- / medical practitioners;
- / people providing services to the College, including specialist visiting teachers, counsellors and sports coaches;
- / recipients of College publications, such as newsletters and magazines;
- / Parents;
- / anyone who the person authorises for the College to disclose information to; and
- / anyone to whom the College is required to disclose the information to by law.

SENDING AND STORING INFORMATION OVERSEAS:

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, the 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 may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

STORAGE AND SECURITY OF PERSONAL INFORMATION

The College stores personal information in a variety of formats including, but not limited to:

- / databases
- / hard copy files
- / personal devices, including laptop computers
- / third party storage providers such as cloud storage facilities
- / paper based files.

The College takes all reasonable steps to protect the personal information it holds from misuse, loss, unauthorised access, modification or disclosure.

HOW DOES THE COLLEGE TREAT SENSITIVE INFORMATION?

In referring to 'sensitive information', the 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

The College's staff are required to respect the confidentiality of pupils' and parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information the 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.

In the event of an eligible data breach occurring at the College, the College will inform all persons affected in conjunction with any directions given by the Office of the Australia Information Commissioner.

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 which the College holds about them and to advise the 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.

For a parent to make a request to access or update any personal information the College holds about themselves or their child, the parent should contact the Privacy Officer in writing. The College may require you to verify your identity and specify what information you require. The College may charge a fee to cover the cost of verification, location, retrieval and review of the application and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance. If the College cannot provide access to that information, it will provide a written notice explaining the reasons for refusal.

CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF PUPILS

The College respects every parent's right to make decisions concerning their child's education.

Generally, the College will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's parents. The 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.

Parents may seek access to personal information held by the College about them or their child by contacting the College 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 the College's duty of care to the pupil.

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

RESPONDING TO DATA BREACHES

The College will take appropriate, prompt action if it has reasonable grounds to believe that a data breach may have, or is suspected to have occurred. Depending on the type of data breach, this may include a review of internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC). If unable to notify individuals, the College will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

ENQUIRIES AND COMPLAINTS

For further information about the way the College manages the personal information it holds, or complaints that are believed to be in breach of the Australian Privacy Principles, please contact by:

- / Emailing [email address e.g. privacy@riverview.nsw.edu.au]
- / Calling 9882 8222

- / Writing to our Privacy Officer at the following address:
Privacy Officer
Saint Ignatius' College
Tambourine Bay Road
Lane Cove NSW 2066

If practical, an individual can contact the College anonymously or by using a pseudonym. However, if an individual chooses not to identify themselves, the College may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

The College will investigate any complaint and will notify the outcomes of a decision in relation to the complaint as soon as is practicable after it has been made.

RELATED DOCUMENTS

- / *Commonwealth Privacy Act*
- / *Health Records and Information Privacy Act 2002*
- / *Code of Conduct*
- / *Employment Collection Notice*



FURTHER INFORMATION

Further information or assistance about anything contained in this document can be sought from the Principal or Head of Risk and Compliance.

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