

Privacy Policy

School Context:

Doxa School Bendigo is a Child Safe community committed to providing an environment that is true to the values of our schoolwide expectations: being **Safe, Kind** and **Curious**. We promote care for all individuals in the school community and this is reflected in our support of students to learn to understand and regulate their own behaviour.

All of Doxa School's policy and procedural documentation is underpinned by our **5 key Pillars of the Doxa School Model: Student-Centred Approach, Trauma Sensitive Practice, Social and Emotional Literacy, Choice Theory and our Catholic Identity** and complies with the requirements of Catholic Education Sandhurst Ltd. This Policy can be found on our school website www.doxabendigo.catholic.edu.au and applies to all community members of Doxa School Bendigo.

Purpose:

Doxa School recognises and understands the importance of privacy and are committed to protecting personal information which may be collected, held and stored.

Doxa School is bound by a range of privacy legislation, including the applicable privacy principles (APPs) under the *Privacy Act 1988* (Cth). In relation to health records, Doxa School is also bound by the *Health Records Act 2001* (Vic.) and the Health Privacy Principles in that Act.

On occasions, personal information may be used where there is an exemption under applicable legislation. As an example, the Privacy Act exempts certain actions by employers in connection with employee records. Any exemptions will take priority over this Policy, however Doxa School will always aim to incorporate the Australian Privacy Principles and manage personal information with a high degree of diligence and care. Australian Privacy Principles are available from the Office of the Australian Information Commissioner - www.oaic.gov.au/

Doxa School will review and update this Privacy Policy to take account of new laws and technology, changes to our and Catholic Education Sandhurst Ltd's operations and practices, and to make sure it remains appropriate to the changing workplace environment.

Data and Information Collection:

Type of Information Collected

Doxa School collects and holds personal information, including health and other sensitive information, about:

- Students and parents/carers/guardians before, during and after the course of a student's enrolment, including:
 - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
 - Parents' education, occupation, and language background
 - medical information (e.g., details of disability and/or allergies, and details of any assistance the student receives in relation to those disabilities, medical reports, names of doctors)
 - conduct and complaint records, or other behaviour notes, school attendance and school reports
 - information about referrals to government welfare agencies
 - counselling reports
 - health fund details and Medicare number
 - any court orders
 - volunteering information (including Working With Children Checks)
 - photos and videos at CES Limited events
- Job applicants, staff members, volunteers and contractors, including:
 - name, contact details (including emergency contact details), date of birth and religion
 - information on job application
 - professional registrations, including Victorian Institute of Teaching registrations
 - screening information, including Working With Children Checks and/or National Police Record Checks
 - professional development history
 - salary and payment information, including superannuation details
 - medical information (e.g., details of disability and/or allergies and medical certificates)

- complaint records, disciplinary records, and investigation reports
 - leave details
 - photos and videos at CES Limited events and school activities
 - workplace surveillance information, in accordance with the *Surveillance Devices Act 1999 (Vic)* and,
 - work emails and private emails (when using work email address) and internet browsing history
- Other people who come into contact with Doxa School, including name and contact details and any other information necessary for the particular contact with us.

Personal Information you provide

Doxa School will generally collect personal information held about an individual by way of forms filled out by parents/carers/guardians or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents/carers/guardians and students (such as job applicants and contractors) provide personal information to us.

Personal Information provided by other people

In some circumstances Doxa 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 report from a school. The type of information Doxa School may collect from another school or agency may include:

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

Exception in relation to employee records

Under the *Privacy Act 1988 (Cth)*, the Australian Privacy Principles do not generally apply in relation to employment records of current and former employees. As a result, this Privacy Policy does not apply to Dox School's treatment of an employee record where the treatment is directly related to a current or former employment relationship between Doxa School and an employee.

This exemption does not extend to job applicants, contractors, or other privacy obligations such as tax file number requirements and health privacy laws.

Doxa School handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001 (Vic.)*.

Anonymity

Doxa School needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate delivery of services, conduct job application processes and fulfil other obligations and processes. However, in some limited circumstances some activities and interactions with Doxa School, or Catholic Education Sandhurst Ltd, may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

Doxa School Use of Information:

Doxa School will use personal information it collects for the primary purpose of data collection, planning and meeting needs, and for secondary purposes that are related to the primary purpose of collection and can be reasonably expected by you, or to which you have consented.

Students and Parents

In relation to personal information of students and Parents, Doxa School's primary purpose of collection is to enable Doxa School to provide services to support students enrolled (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 school activities. This includes satisfying the needs of parents/career/guardians, the needs of the student and the needs of Doxa School throughout the whole period the student is enrolled at the school.

The purposes for which Doxa School uses personal information of students and parents/carers/guardians include:

- to keep parents/carers/guardians informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- day-to-day administration of Doxa School
- looking after students' educational, social, and medical wellbeing
- seeking donations and marketing for Doxa School
- to satisfy Doxa School's legal obligations and allow us to discharge our duty of care
- to satisfy Doxa School's service providers' legal obligations, including the Catholic Education Commission of Victoria Ltd (CECV) and Catholic Education Sandhurst Ltd.

In some cases where Doxa School requests personal information about a student or parent/carer/guardian, if the information requested is not provided, Doxa 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.

Job applicants, volunteers, and contractors

In relation to personal information of job applicants and contractors, Doxa 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 Doxa School uses personal information of job applicants and contractors include:

- verifying and screening job applicants and contacting nominated referees
- administering the individual's employment or executing a contract, as the case may be
- for insurance purposes
- seeking donations and marketing
- satisfying Doxa School's legal obligations, for example, in relation to child protection legislation

Counsellors

Doxa School may, contract external providers to provide counselling services for some students. The Principal may require the Counsellor to inform him or her or other staff of any issues the Principal and the Counsellor believe may be necessary for Doxa School to know for the wellbeing or development of the student who is counselled or other students at Doxa School.

Parish

Doxa School may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising. Prior permission would be required to obtain personal information for fundraising purposes.

Marketing and Fundraising

Doxa 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 Doxa School may be disclosed to organisations that assist in school's fundraising, for example, the School's Foundation or alumni organisation.

Prior permission would be required to obtain personal information for fundraising purposes for external providers not connected to the school community.

Parents/carers/guardians, staff, contractors and other members of the wider school community may from time-to-time receive fundraising information. School Publications, like newsletter and magazines, which include personal information and sometimes people's images, may be used for marketing purposes.

Data Integrity

Personal information must only be collected as necessary, in accordance with the above, and activities must comply with legal or regulatory obligations. Personal information must always be collected by lawful and fair means and not in an unreasonably intrusive way.

Doxa School staff must take steps to ensure that any personal information collected, used and disclosed is accurate, up-to-date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

CES Limited Disclosure of Information:

CES Limited may disclose personal information, including sensitive information, held about an individual for **educational, legal, administrative and support purposes**. This may include providing information to:

- Doxa School service providers which provide educational, support and health services, (either at Doxa School or off-site) including the Catholic Education Commission of Victoria Ltd (CECV), specialist visiting teachers, volunteers, counsellors, 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, host services and/or applications to schools and school systems including the Integrated Catholic Online Network (ICON) and Google's 'G' Suite, including Gmail and, where necessary, to support the training of selected staff in their use
- CECV to discharge its responsibilities under the *Australian Education Regulation 2013* (Regulation) and the *Australian Education Act 2013* (Cth) (AE Act) relating to students with a disability
- Authorised organisations in accordance with the Child Information Sharing Scheme (CISS) or the Family Violence Information Sharing Scheme (FVISS)
- other third parties which Doxa School uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with parents

- another School, including to its teachers to facilitate the transfer of a student
- Federal and State government departments and agencies
- health service providers
- recipients of Doxa School or Catholic Education Sandhurst Ltd publications, such as newsletters and magazines
- student's parents/carers/guardians and their emergency contacts
- assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority
- anyone to whom you authorise to disclose information and,
- anyone who we are required or authorised to disclose the information to by law, including child protection laws

Nationally Consistent Collection of Data on Schools with Disability

Doxa School is required by the *Federal Australian Education Regulation (2103)* and *Australian Act (2013) (Cth) (AE Act)* to collect and disclose certain information under the *Nationally Consistent Collection of Data (NCCD)* on students with disability. Doxa School provides the required information at an individual student level to Catholic Education Sandhurst and CECV, as an approved authority. Approved authorities must comply with reporting, record keeping data quality assurance 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

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

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

Doxa 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's G Suite, including Gmail) which may be accessible by you. 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.

Doxa School and Catholic Education Sandhurst Ltd staff and service providers, and the CECV and its 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.

Doxa 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 APPs.

Where personal and sensitive information is retained by a cloud service provider on behalf of Doxa School, Catholic Education Sandhurst Ltd or CECV to facilitate Human Resources and staff administrative support, this information may be stored on servers located in or outside Australia.

Sensitive Information:

Sensitive information about a person includes information or an opinion relating to a person's racial or ethnic origin, political opinions, membership of a political, trade or other philosophical or religious beliefs or affiliations, sexual orientation or practices, criminal record, 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:

Doxa School staff are required to respect the confidentiality of individuals' personal information and the privacy of individuals. These obligations apply both where the information is held on-site or where the information is held by other service providers.

Doxa School has in place steps to protect the personal information that Doxa 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. This includes responding to any incidents which may affect the security of the personal information it holds. If we assess 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.

Doxa School recommends that all persons adopt secure practices to protect themselves and their data, including ensuring that all passwords used are strong and regularly updated and that applicable log in details are kept secure.

Do not share your personal information with anyone without first verifying their identity and organisation. If you believe any of your personal information has been compromised, please let Doxa School or Catholic Education Sandhurst Ltd know immediately.

Access and Collection:

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 which Doxa School holds about them and to advise Doxa School of any perceived inaccuracy.

Student Data

Students will generally be able to access and update their personal information through their parents/carers/guardians, 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 Doxa School holds, please contact the Principal by telephone on 03 5442 8140, or in writing 118 Hargreaves St, Bendigo, or CES Limited's Privacy Officers (*via telephone on 5443 2377 or email privacy@ceosand.catholic.edu.au*). Doxa School or Catholic Education Sandhurst Ltd may require you to verify your identity and specify what information you require. A fee may be charged to cover the cost of verifying your application and locating, retrieving, reviewing, and copying any material requested. If the information sought is extensive, you will be advised of 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.

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

CES Limited Employees

Subject to some exceptions under privacy laws, employees have the right to see and have a copy of their personal information and to advise CES Limited of any changes necessary if the information is not correct.

Where CES Limited decides not to make a requested correction to the personal information and the employee disagrees, they may request that a note of the requested correction with the information be placed in their personnel file.

Consent and Rights of Access to the Personal Information of Students:

Doxa School respects the right of every parent/carer/guardian to make decisions concerning their child's education. Generally, Doxa School will refer any requests for consent and notices in relation to the personal information of a student to the student's parents/carers/guardians. In most circumstances, Doxa School will treat consent given by parents/carers/guardians as consent given on behalf of the student and notice to parents/carers/guardians will act as notice given to the student.

Parents may seek access to personal information held by Doxa School about them or their child by contacting the Principal by telephone on 03 5442 8140, or in writing 118 Hargreaves St, Bendigo, or CES Limited's Privacy Officers (*via telephone on 5443 2377 or email privacy@ceosand.catholic.edu.au*). 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 Doxa School or Catholic Education Sandhurst Ltd's duty of care to the student.

Doxa School or Catholic Education Sandhurst Ltd may, at its discretion, on the request of a student, grant that student access to information held about them or allow a student 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 student and/or the student's personal circumstances warrant it.

Enquiries and Complaints:

If you would like further information on this policy or you wish to complain that you believe that Doxa School or Catholic Education Sandhurst Ltd has breached privacy obligations, please contact the Principal by telephone on 03 5442 8140, or in writing 118 Hargreaves St, Bendigo, or CES Limited's Privacy Officers (*via telephone on 5443 2377 or email privacy@ceosand.catholic.edu.au*).

All complaints should initially be in writing and will be responded to as soon as possible but not later than within fourteen working days to confirm the responsible person to manage the query.

Doxa School and/or Catholic Education Sandhurst Ltd will attempt to resolve the complaint within 30 working days however, if this is not possible, the complainant will be contacted to provide an update. If the complainant feels that the complaint has not been adequately dealt with, they may make a complaint to the Privacy Commissioner whose contact details are as follows:

Office of the Australian Information Commissioner (OAIC)

GPO Box 5218, Sydney, NSW 2001 Telephone: 1300 363 992 <http://www.oaic.gov.au>