



## Personal information collected by schools and method of collection

The type of information schools collect and hold 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 the school:
  - name, contact details (including next of kin), date of birth, previous school and religion;
  - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
  - conduct and complaint records, or other behaviour notes, and school reports;
  - information about referrals to government welfare agencies;
  - results of assignments, tests and examinations;
  - counselling reports;
  - health fund details and Medicare number;
  - any court orders;
  - volunteering information; and
  - photos and videos at school events;
- job applicants, staff members, volunteers and contractors, including:
  - name, contact details (including next of kin), date of birth, and religion;
  - information on job application;
  - professional development history;
  - salary and payment information, including superannuation details;
  - medical information (e.g. details of disability and/or allergies, and medical certificates);
  - COVID -19 vaccination status (e.g. fully vaccinated or partially vaccinated with a COVID-19 vaccine approved by the Therapeutic Goods Administration or endorsed by WHO-COVAX if the vaccination occurred outside Australia) or unvaccinated;
  - complaint records and investigation reports;
  - leave details;
  - photos and videos at school events;
  - workplace surveillance information;
  - work emails and private emails (when using work email address) and Internet browsing history; and

- other people who come into contact with the school, including name and contact details and any other information necessary for the particular contact with the school.

**Personal Information you provide:** A 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.

If enrolment is made at one (or more) schools in the Cairns Diocese the personal information provided during the application may be shared between the schools. This personal information may include health information and is used for the purpose of considering and administering the enrolment of the student.

**Personal Information provided by other people:** In some circumstances a 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. If a student transfers to a new school in the Cairns Diocese, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

**Surveillance and monitoring:** Catholic Education Services and schools reserve the right to monitor all staff and student Information and Communication Technology user activity to ensure compliance with legal, ethical and acceptable use expectations. Generally, this will reflect the content of ICT user agreements for students, the separate policies on the acceptable use of ICT for staff and students, and for staff, the provisions of the Catholic Education Code of Conduct for Employees and the Statement of Principles for Employment in Catholic Education. Schools may also use video surveillance as part of school safety and security management.

**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.

## School use of personal information you provide

A 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 or to which you have consented.

**Pupils and Parents:** In relation to personal information of pupils and Parents, a school's primary purpose of collection is to enable the school to provide schooling to pupils enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable pupils to take part in all the activities of the school. This includes satisfying the needs of Parents, the needs of the pupil and the needs of Cairns Catholic Education Services and school throughout the whole period the pupil is enrolled at the school.

The purposes for which Cairns Catholic Education Services and a 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, including seeking the payment of fees for schools within the Cairns Diocese when a student transfers between schools;
- looking after pupils' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the school; and
- to satisfy Cairns Catholic Education Services' and the school's legal obligations and allow the school to discharge its duty of care.

In some cases where a school requests personal information about a pupil or Parent, if the information requested is not obtained, the 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, a 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 a 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 funds and marketing for the school;
- satisfying Cairns Catholic Education Services' and the school's legal obligations, for example, in relation to child protection legislation; and,

- ensuring that job applicants and contractors are compliant with any Government Public Health Order or Diocesan policy and direction that workers be fully vaccinated against COVID-19 as a legal requirement or term of their employment or engagement (as part of Cairns Catholic Education's work health and safety and duty of care obligations).
- medical practitioners;
- people providing educational, support and health services to the school, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools;
- providers of specialist advisory services and assistance to the school, including in the area of Human Resources, child protection and students with additional needs;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority, and authorities administering the NAPLAN tests;
- agencies and organisations to where the school is required to disclose personal information for education, funding and research purposes;
- people and organisations providing administrative, technology and financial services to the school;
- recipients of school publications, such as newsletters and magazines;
- pupils' parents or guardians;
- anyone you authorise the school to disclose information to; and
- anyone to whom we are required or authorised to disclose the information by law, including child protection laws.

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

**Marketing and fundraising:** Schools treat marketing and seeking donations for the future growth and development of the school as an important part of ensuring that the school continues to be a quality learning environment in which both pupils and staff thrive. Personal information held by a school may be disclosed to an organisation that assists in the school's fundraising, for example, the 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.

**Exception in relation to related schools:** The Privacy Act allows each school, being legally related to each of the other schools conducted by Cairns Catholic Education Services to share personal (but not sensitive) information with other schools conducted by Cairns Catholic Education Services. Other Cairns Catholic schools may then only use this personal information for the purpose for which it was originally collected by Cairns Catholic Education Services. This allows schools to transfer information between them, for example, when a pupil transfers from a Cairns Catholic school to another school conducted by Cairns Catholic Education Services.

## Who might a school disclose personal information to and store your information with?

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

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student, and schools within the Cairns Diocese where concurrent applications for enrolment are made to those schools;
- government departments;
- Cairns Catholic Education Services, the Queensland Catholic Education Commission, the school's local diocese and the parish, other related church agencies/entities, and schools within other Dioceses/other Dioceses;

**Sending and storing information overseas:** Personal information will not be disclosed by the school to recipients outside Australia unless there is a reasonable belief that:

- a) the information will remain subject to principles for fair handling of the information which are substantially similar to Australian Privacy Principles;
- b) there are mechanisms to take action to enforce such principles; and
- c) the information will not be collected, held, used or disclosed by the recipients of the information in a manner inconsistent with the Catholic Education's privacy policy.

In some circumstances, the law may require us to use or disclose personal information for other purposes. Except as otherwise permitted by law, we only disclose sensitive information with consent, for the purposes for which it was collected, and to the parties described above.

The school uses centralised information management and storage systems (Systems). These Systems are provided by the Catholic Education Network (CENet) and third party service providers. CENet is owned by the Catholic Dioceses. Personal information is shared with and accessed by CENet and their third party providers for the purpose of providing services to schools in connection with the Systems and for CENet administering the education of students.

**Online or 'cloud' service providers:** The school may use other online or 'cloud' service providers to store personal information and to provide online services to the school that involve the use of personal information, such as services relating to email, instant messaging

and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. School personnel and Cairns Catholic Education Services, the Queensland Catholic Education Commission and their service providers (including CENet), 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 GAFE and ensuring its proper use.

## How does a school treat sensitive information?

In referring to 'sensitive information', a 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

Cairns Catholic Education Services and school staff are required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

Each 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 password access rights to computerised records.

## Access and correction of personal information

Under the Commonwealth Privacy Act, an individual has the right to seek and obtain access to any personal information which Cairns Catholic Education Services or a school holds about them and to advise Cairns Catholic Education Services or the school of any perceived inaccuracy. There are some exceptions to this right set out in the Act. 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 to update any personal information Cairns Catholic Education Services or a school holds about you or your child, please contact the school's Principal or administration by telephone or in writing.

The school may require you to verify your identity and specify what information you require. The 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, the 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, unless, in light of the ground for refusal, it would be unreasonable to provide reasons.

Parents can also log on to the Parent Portal and connect and update some of their or their child's personal information at any time.

## **Consent and rights of access to the personal information of pupils**

Cairns Catholic Education Services respects every Parent's right to make decisions concerning their child's education.

Generally, a school will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's Parents. A 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 a school or Cairns Catholic Education Services about them or their child by contacting the school 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 the school's duty of care to the pupil.

A school may, at its discretion, on the request of a pupil grant that pupil access to information held by the 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 Cairns Catholic Education Services or a school manages the personal information it holds, or wish to complain that you believe that Cairns Catholic Education Services or a school has breached the Australian Privacy Principles, please contact the school Principal by writing or telephone. Cairns Catholic Education Services or the school will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.