

APPLICABLE TO	CSO and Diocesan staff and school communities
DOCUMENT OWNER	Director of Schools
APPROVAL DATE	November 2018
APPROVED BY	CSO Leadership Team
SCHOOL ACTIONS	System policy: Local policy not required. Each school may develop school-specific work instructions if required, consistent with and aligned to the principles and practices outlined in this policy. Schools are required to publish the Privacy Policy and procedures on their website.
LAST REVIEW DATE/S	October 2017
NEXT REVIEW DATE	October 2021
RELATED DOCUMENTS	Privacy Management Procedure 2018 Data Breach Response Procedure 2018 Complaints Resolution Policy 2018

Purpose

YOUR PRIVACY IS IMPORTANT TO US

The Catholic Schools Office and diocese schools in the Diocese of Maitland-Newcastle are committed to complying with the *Privacy Act 1988* (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) in the Privacy Act. We respect and value the personal information that you are willing to entrust to us, and this policy explains how we collect, hold, store, use, disclose and otherwise manage that personal information.

We may from time to time review and update this policy to comply with our legal obligations, to reflect changes in technology and to our operations and practices, and to ensure it remains relevant to our environment. Changes to the policy will be published on our website www.mn.catholic.edu.au.

Scope

This policy applies to personal information held by the CSO and its schools.

Policy Statement

WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, regardless of whether the information or opinion is true or not, or whether it is recorded in a material form or not.

Sensitive information is a subset of personal information, which is given a higher level of protection under the Privacy Act. It includes, amongst other things, health information about you, your criminal record and your religious beliefs or affiliations.

We collect and hold personal information, which may include sensitive information about:

- Children, which may be related to children receiving sacraments or pastoral care, a child's enrolment at a diocesan school, after school care facility or sporting association;
- Employees, Job applicants, volunteers, contractors and suppliers;
- People who are involved in fundraising and relationship building, including banking or other payment details;
- People we communicate with or who attend Mass, liturgies, seminars or events;
- People who are Members of groups, organisations, societies, institutes of apostolic life or the Church community;
- People who access to and use of our websites and other electronic media and communications; and
- Parents or guardians of those we hold personal information about.

Personal information you provide

We will generally collect your personal information by way of forms filled out either by the individual or their guardian/responsible person, face-to-face meetings, interviews, telephone calls and website or other electronic data.

Personal information provided by other people

In some circumstances, a third party including other parishes, may provide us with your personal information, e.g. a reference about an applicant for a position, information we collect from people we help, educate, third party information providers or people responding to our inquiries.

In some cases, where you do not provide personal information we request, we may not be able to help, employ, engage with, or educate to you in some or any of our activities.

You may also choose to deal with us on an anonymous basis or using a pseudonym. However, we will need to identify you in many circumstances, for example, to provide care for your children or to process a job or volunteer application.

HOW WILL WE USE THE PERSONAL INFORMATION YOU PROVIDE?

We will use personal information we collect from you to:

- keep you informed about matters relating to your child's schooling and spiritual life, through correspondence and newsletters;
- provide care for your child(ren) while under our supervision (including education, social, spiritual and medical wellbeing);
- fundraise, seek and administer donations;
- tell you about events, services and developments in the Church and our community;
- assess your job or volunteer application;
- manage our staff and volunteers;
- satisfy the Diocese's legal obligations and allow the Diocese to discharge its duty of care.

TO WHOM MIGHT WE DISCLOSE PERSONAL INFORMATION?

In particular circumstances, we may, disclose personal information held about an individual to:

- a Parish of the Diocese;
- other schools in the diocese;
- assessment and educational authorities;
- government departments;
- medical practitioners;

- people providing services to the Diocese, including volunteers and any third party service providers;
- recipients of Diocese publications;
- parents and/or guardians;
- if required or authorised by an Australian law or court/tribunal order
- anyone to whom you authorise the Diocese (including its agencies and schools) to disclose information.

Overseas disclosures: We will only disclose personal information about you or your child outside Australia where you have agreed to this. Where you make such a request, you agree and acknowledge that we will have no control over the information that we disclose, and that we will not be able to ensure that the overseas recipient handles that information in accordance with the Privacy Act, the Australian Privacy Principles and any other applicable Australian laws.

Examples include:

- The publication on the internet of material which may contain personal information such as photographs, video and audio recordings, and posts and comments on our social media platforms.
- To facilitate educational outcomes eg. School exchange
- The provision of personal information to recipients using a web-based email account where data is stored on an overseas server; and
- The provision of personal information to foreign governments and law enforcement agencies (in limited circumstances and where authorized by law).

DIRECT MARKETING

You may opt out of receiving communications from us about our services and activities including fundraising, at any time by contacting us on the details below.

MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

Our staff are required to respect the confidentiality of the information and privacy of individuals. We have processes in place to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password restricted access rights to computerised records.

Where we no longer require personal information for a purpose required under the Privacy Act, we will take reasonable action to destroy or de-identify that information, unless it would be unlawful for us to do so.

CORRECTION AND UPDATING PERSONAL INFORMATION

We endeavour to ensure that the personal information we hold is accurate, complete, and up to date, and where using or disclosing it, relevant for the purpose of the use or disclosure.

A person may seek to update the personal information we hold about them by contacting us at any time on the details below. If we are unable to correct your information, we will give you notice of this in writing and explain why and how you can take the matter further. You can also request that we associate a statement with the information that you believe is inaccurate, out-of-date, incomplete, irrelevant or misleading.

ACCESS TO PERSONAL INFORMATION WE HOLD ABOUT YOU

You may access any personal information that we hold about you. Parents can generally make such a request on behalf of their children. Guardians can generally make such a request on behalf of a

person under their guardianship. To make a request for access, please put your request in writing and send it to us on the details below.

We may require you to verify your identity and specify what information you require before we can provide access. In some circumstances as provided for by APP 12, we may be unable to provide access, in which case we will notify you of this in writing and explain why and how you can take the matter further. We will not charge you for making a request; however, we may charge you our reasonable costs of providing access to any information requested.

CONSENT AND RIGHT OF ACCESS TO THE PERSONAL INFORMATION OF CHILDREN

We assess whether a child has the capacity to make their own privacy decisions on a case-by-case basis, having regard to matters such as their age and circumstances. Generally, individuals over 15 years will have the capacity to make their own privacy decisions.

For children under 15 years or who otherwise do not have capacity to make these decisions for themselves, we will refer any requests for consent and notices in relation to personal information to the parent and/or guardian. We will treat consent given by a parent and/or guardian as consent given on behalf of the child or person subject to guardianship and notices to parent and/or guardians will act as notice given to the child or person subject to guardianship.

ENQUIRIES AND COMPLAINTS

If you would like further information about the way we manage personal information, please contact us on the details below.

CONTACT DETAILS

Policy and Compliance Officer, Catholic Schools Office
841 Hunter Street, Newcastle West 2302
Phone 02 4979 1319
Email info@mn.catholic.edu.au

If you believe that we have acted contrary to this Policy or the Privacy Act, please put your complaint in writing and send it to us using the details above. We will investigate your complaint and try to resolve it. However, if you are not satisfied with the response, you can contact the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 to make a query about your privacy rights, or visit www.oaic.gov.au for more information about how to lodge a complaint. The OAIC has the power to investigate the matter and make a determination.

Review

This policy is managed by the Office of the Director of Schools and will be routinely reviewed to maintain currency and effectiveness.