

*“We are called to
love one another”*



PRIVACY STATEMENT

1. Context

Nazareth Catholic Community respects the privacy of personal and sensitive information regarding your family. Nazareth Catholic Community collects personal information, including sensitive information about the student, child and parent (s) or guardians (s) before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable Nazareth Catholic Community to provide schooling for your child.

Some of the information collected is to satisfy Nazareth Catholic Community's legal obligations, particularly to enable the College to discharge its duty of care.

2. Purpose

This Privacy Statement outlines how Nazareth Catholic Community uses and manages personal information provided to or collected by it. Laws governing or relating to our operation require certain information to be collected and disclosed. These include the National Privacy Principles contained in the Commonwealth Privacy Act 1988, in addition to, but not limited to relevant Education Acts and Public Health and Child Protection laws

3. Rationale

This Privacy Statement applies to Catholic Schools administered by the Catholic Education Office (CESA) of the Catholic Archdiocese of Adelaide in South Australia.

4. Definitions

The school or CEO includes the Catholic schools and any associated entities (including e.g. committees, OSHC, FLP, pre-school, early learning centres, etc.) and the Catholic Education Office (CEO) in the Archdiocese of Adelaide, as well as sites on which staff or others engaged in duties or activities such as excursions or conference attendance sanctioned by their School or CEO.

Staff means staff employed by any Catholic School or the Catholic Education Office in the Archdiocese of Adelaide.

Parents means parents and/or guardians

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not, and whether the information is recorded in a material form or not. It includes all personal information regardless of its source.

Sensitive information is a type of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations,

philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information.

5. Policy

What types of personal information do we collect and how do we collect it?

The type of information Nazareth Catholic Community collects and holds includes (but is not limited to) personal information, including sensitive information about:

- students and parents and/or guardians (parents) before, during and after the course of a student's enrolment at the school
- 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, 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;
- 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
- 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);
- 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: Nazareth Catholic Community will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings, conversations and interviews, emails and telephone calls. On occasions people other than parents and students provide personal information.

Personal Information provided by other people: In some circumstances Nazareth Catholic Community 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 1988, this Privacy Statement 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.

How will we use the personal information you provide?

Nazareth Catholic Community 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.

Students and Parents: In relation to personal information of students and parents, a school's primary purpose of collection is to enable the school to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the school. This includes satisfying the needs of parents, the needs of the student and the needs of the CEO and school throughout the whole period the student is enrolled at the school.

The purposes for which the CEO and a school uses personal information of students and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence and publications;
- day-to-day administration;
- looking after students' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the school; and
- to satisfy the CEO 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 student or Parent, if the information requested is not obtained, the 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 and contractors: In relation to personal information of job applicants and contractors, Nazareth Catholic Community'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; and
- satisfying the CEO's and the school's legal obligations, for example, in relation to child protection legislation.

Volunteers: Nazareth Catholic Community also obtains personal information about volunteers who assist in functions or conduct associated activities, to enable the school and the volunteers to work together.

Marketing and fundraising: Nazareth Catholic Community treat marketing and seeking donations for programs and initiatives that support the mission and values of our community as an important part of ensuring that we continue to be a quality learning environment in which both students and staff thrive. Personal information held by Nazareth Catholic Community may be disclosed to an organisation that assists in the school's fundraising, for example, committees 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. Publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

Exception in relation to related schools: The Privacy Act 1988 allows each school, being legally related to each of the other schools conducted by the CEO to share personal (but not sensitive) information with other schools conducted by the CEO. Other CEO schools may then only use this personal information for the purpose for which it was originally collected by the CEO. This allows schools to transfer information between them, for example, when a student transfers from a CEO school to another school conducted by the CEO.

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

Nazareth Catholic Community may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other schools and teachers at those schools;
- government departments (including for statement and funding purposes);
- the CEO, the South Australian Commission for Catholic Schools (SACCS), the school's local diocese and parish, other related church agencies/entities, and schools within other Dioceses/other Dioceses;
- medical practitioners and allied health professionals;
- people providing educational, support and health services to the school, including specialist visiting teachers, sports coaches, volunteers, and counsellors;
- providers of learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- people providing administrative and financial services to the school;
- recipients of school publications, such as newsletters and magazines;
- students' 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.

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

The school may use online or 'cloud' service providers to store personal information and sensitive information and to provide services to the school that involve the use of personal information and sensitive 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 Microsoft 365. Microsoft 365 provides email and stores and processes limited personal information for this purpose. School personnel, the CEO, SACCS and their 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 Microsoft 0365 and ensuring its proper use.

How does Nazareth Catholic Community 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

The CEO's and Nazareth Catholic Community's staff are required to respect the confidentiality of students' 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 the CEO or a school holds about them and to advise the CEO or the school of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents, but older students 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 the CEO or a school holds about you or your child, please contact the Principal 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.

Consent and rights of access to the personal information of students

The CEO respects every Parent's right to make decisions concerning their child's education.

Generally, Nazareth Catholic Community will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. A school will treat consent given by parents as consent given on behalf of the student, and notice to parents will act as notice given to the student.

Parents may seek access to personal information held by a school or the CEO about them or their child by contacting the school's Principal 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 student.

A school may, at its discretion, on the request of a student grant that student access to information held by the school 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 about the way the CEO or Nazareth Catholic Community manages the personal information it holds, or wish to complain that you believe that the CEO or Nazareth Catholic Community has breached the Australian Privacy Principles, please contact the Principal or the Director of Catholic Education, Archdiocese of Adelaide (as appropriate) by writing or telephone. The CEO 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.

6. Related Policies, Procedures and Resources

This Statement is to be read in conjunction with, and is additional to, any other relevant South Australian Commission for Catholic Schools (SACCS), school or CEO statement, procedure or support document including:

- *SACCS Privacy Policy (2018) available at CESA privacy collection <LINK> when available*
- *Privacy collection notices available at CESA privacy collection <LINK> + Nazareth Link when available*
- *Nazareth Enrolment Form – when updated based on this*

7. Responsibility for Implementation, Monitoring and Continual Improvement

Responsibility for implementation, monitoring and review of the policy is vested at the level appropriate to the following roles:

- Principal
- Head of Campuses

8. Revision Record

The following roles provide a point of contact for the policy and are responsible for its ongoing review and revision

Policy Leader	Principal
Approved Authority	Nazareth Governing Council
Review Date	26/08/2022