



Privacy Policy

This Policy details how Sacred Heart College ("College") protects your privacy and how we use and manage personal information provided to us.

The College is bound by the Commonwealth Privacy Act. On 12 March 2014 substantial changes to the existing Privacy laws came into effect with the introduction of thirteen (13) Australian Privacy Principles ("APP's"). This Policy has been amended to reflect those APP's.

This Policy sets out:

1. Who we collect personal information from;
2. The types of personal information collected and held by us;
3. How this information is collected and held;
4. The purposes for which personal information is collected, held, used and disclosed;
5. How you can gain access to your personal information and seek its correction;
6. How you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled.

1. Who we collect Personal Information from.

We collect personal information from a variety of sources including but not limited to; students (both current and future), parents (both current and future), job applicants, staff, volunteers, alumni members, contractors and visitors.

For purpose of clarity employee records are not covered by the APP's where they relate to current or former employment contracts between the college and the employee.

2. The types of personal information collected and held by us.

The nature and type of personal information we collect in the normal course of our operations is largely dependent upon whose information we are collecting and the reason why we are collecting it.

In general terms the college may collect personal information, sensitive information and health information.

- “Personal Information” is the general term that is used to describe information or an opinion about an identified individual or an individual that is reasonably identifiable. It can include such things as names, addresses and other contact details; dates of birth; marital status, next of kin details; financial information, photographic images and attendance records.
- “Sensitive Information” is included under personal information and can include such things as religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, professional or union memberships, family court orders and criminal records. It also includes health information.
- “Health Information” is a subset of sensitive information and includes any information collected about an individual’s health or disability and any information collected in relation to a health service that is provided. It can include such things as medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.

3. How this information is collected and held.

How we collect personal information largely depends upon whose information we are collecting.

If it is reasonable and practical to do so, we will collect personal information directly from the individual concerned. In the case of students it is reasonable that the majority of personal information will be collected from the parents or guardians of the student.

To facilitate this process the college has a number of specifically designed forms which attempts to standardise the collection of personal information. It should be noted however that given the dynamic nature of our operations, we will often also receive personal information by other means including but not limited to email, letters, notes, over the telephone, face to face meetings, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring.

Personal information may also be collected from other people (e.g. an earlier school report, parish/personal reference) or from independent sources such as a telephone directory. However, we will only do so where it is not reasonable and practical to collect the information from you directly.

We may also receive personal information even though we have not sought that information; this is known as “unsolicited information”. In those instances where we have received unsolicited information we will only hold, use and/or disclose that information if we could

otherwise do so had we collected it in accordance with this Privacy Policy. Where that unsolicited information could not have been collected by the means outlined in this Privacy Policy then we will take steps to destroy, permanently delete or de-identify the information.

4. The purposes for which personal information is collected, held, used and disclosed.

We use personal information that has been collected to carry out the reasonable expectations of our day to day operations. This is regarded as the “primary purpose”. We may also use personal information for a related secondary purpose that would be reasonably expected by you, or to which you have consented. By way of example a secondary purpose may arise where the College may contact you if you possess a skill or level of expertise that may be of benefit to the College at a particular time or for a particular purpose. In this instance you would be under no obligation to respond.

Generally, we collect, use and exchange your information so that we can undertake and perform various functions, including but not limited to:

- provide education, pastoral care, extra-curricula and health services;
- satisfy our legal obligations including our duty of care and child protection obligations;
- keep parents informed as to college community matters through correspondence (written and electronic), newsletters and magazines;
- market, promote and undertake fundraising activities;
- support the activities of college associations such as the College Board, P&F, FROSHA and the like;
- support community based causes and activities, charities and other causes in connection with the College's functions or activities;
- improve our day to day operations including training of staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis;
- undertake appropriate and necessary administration functions;
- engage in the employment of staff;
- engage in the appointment of volunteers.

Sensitive information is only collected when reasonably necessary for one or more of these functions or activities:

- if we have the consent of the individuals to whom the sensitive information relates; or
- if the collection is considered reasonably necessary to lessen or prevent a risk to life, health or safety; or
- another permitted general situation (such as locating a missing person) or permitted health situation (such as the collection of health information to provide a health service) exists.

In those instances where we do not have the relevant consent and a permitted health situation or permitted general situation does not exist, then we may still collect sensitive information but only where it relates solely to individuals who have, or it is considered likely, will have regular contact with the college in connection with our normal activities.

By way of example these individuals may include:

- students (future, current and past);
- staff (future, current and past);
- parents;
- volunteers; and
- other individuals with whom the college has regular contact in relation to our activities.

We only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

Storage and Security of Personal Information

We store personal information in a variety of formats including databases, in hard copy files and on personal devices including laptop computers, mobile phones, tablets, cameras and other recording devices. The security of your personal information is important and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include:

- Restricting access to information on the college databases on a need to know basis with different levels of security being allocated to staff based on their roles, responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets in

lockable rooms. Access to these records is restricted to staff on a need to know basis.

- Implementing physical security measures around the college buildings and grounds to prevent or at least minimise break-ins.
- Designing, implementing and monitoring ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking appropriate due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Personal information we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices.

When We Disclose Personal Information

We only use personal information for the purposes for which it was given to us, or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities. We may disclose your personal information to government agencies, other parents, other colleges, recipients of college publications, visiting teachers, counsellors and coaches, our service providers, agents, contractors, business partners and other recipients from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation or permitted health situation exception applies;
- disclosure is reasonably necessary for a law enforcement related activity.

Personal Information of Students

It should be noted that The Privacy Act does not differentiate between

adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information.

The College takes a common sense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/guardians. In this context we will treat notices provided to parents/guardians as notices provided to students and we will treat consents provided by parents/guardians as consents provided by a student.

Disclosure of Personal Information to Overseas Recipients

From time to time we may disclose personal information about an individual to overseas recipients, such as when organising an overseas excursion, facilitating a student exchange, relocation of the family to another country, or storing information with a "cloud computing service" which stores data outside of Australia.

In these instances we will take all reasonable steps not to disclose an individual's personal information to overseas recipients unless:

- We have the individual's consent (which may be implied); or
- We have satisfied ourselves as best we can that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- We form the opinion that the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety; or
- We are taking appropriate action in relation to suspected unlawful activity or serious misconduct.

5. How you can gain access to your personal information and seek its correction

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.

Should we not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision.

If the rejection relates to a request to change your personal information you may make a written statement about the requested change and we will attach this to your record.

How We Ensure the Quality of Your Personal Information

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information.

On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

6. How you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled

If you wish to make a complaint about a breach by us of the Australian Privacy Principles you may do so by providing your written complaint by email, letter, facsimile or by personal delivery to any one of our contact details as noted below. You may also make a complaint verbally.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response. We will work hard to resolve your complaint internally but in the event that you are not satisfied by the response provided then you can take your complaint to the Office of the Australian Information Commissioner.

How to Contact Us

You can contact us about this Policy or about your personal information by:

- Emailing admin@shc.wa.edu.au;
- Phoning (08) 9246 8200
- Writing to our Privacy Officer at PMB 6 Wangara, WA 6947; or
- Fax (08) 9448 7994

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we 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.

Changes to Our Privacy and Information Handling Practices

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website www.sacredheart.wa.edu.au. for a current copy. Should you wish to receive a paper copy please phone the College reception on 9246 8200 to arrange for a copy to be posted.

Effective: 12 March 2014