

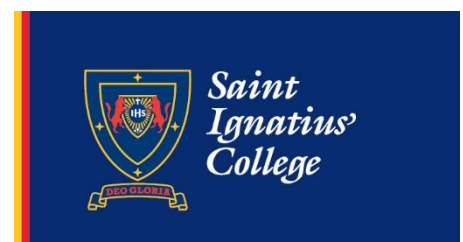
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# Privacy Policy

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IEY/JUNIOR/SENIOR SCHOOL

Version 1.5



**Go, set the world *alight*.**

## Contents

1. STATEMENT .....	3
2. SCOPE .....	3
3. PURPOSE.....	3
4. PRINCIPLES.....	3
4.1 Type of personal information collected .....	3
4.2 Use of personal information.....	4
4.3 Disclosure and storage of personal information .....	5
4.4 Treatment of sensitive information.....	6
4.5 Management and security of personal information .....	6
4.6 Access and correction of personal information .....	7
4.7 Consent and rights of access to the personal information of “students” .....	7
4.8 Nationally Consistent Collection of Data (NCCD) on School Students with Disability .....	8
4.9 Student Residential Address Collection for Commonwealth Funding Arrangements .....	8
4.10 Enquiries and Complaints.....	8
4.11 Mandatory Breach Notification.....	8
5. ROLES AND RESPONSIBILTIES .....	9
5.1 College Board.....	9
5.2 Risk and Compliance Board Committee .....	9
5.3 Principal .....	9
5.4 Head of Business.....	9
5.5 Risk and Compliance Officer.....	9
6. RELATED LEGISLATION, DOCUMENTS, RESOURCES .....	9
7. DOCUMENT AVAILABILITY, REVIEW AND UPDATES .....	10
8. REVISION RECORD .....	10

## 1. STATEMENT

Saint Ignatius' College which is operated and administered by Saint Ignatius' College (Adelaide) Ltd and hereafter referred to as the College is committed to managing personal information in an open and transparent manner.

The College is bound by the Australian-Privacy Principles contained in the in the Commonwealth *Privacy Act 1988 (Cth)*.

## 2. SCOPE

The provisions of this Policy apply to all personal and sensitive information (personal information) collected and held by the College.

## 3. PURPOSE

The College is required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. This Policy sets out how the College manages personal information including how it holds, uses, discloses and updates the personal information provided or collected by it.

## 4. PRINCIPLES

### 4.1 Type of personal information collected

The College collects and holds personal information, including health and other sensitive information, about:

- students and parents and/or guardians (parents) before, during and after the course of a student's enrolment at the College, including but not limited to:
  - 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 reports;
  - academic results;
  - information about referrals to government welfare agencies;
  - counselling reports;
  - health fund details and Medicare number;
  - credit and debit payment information and credit eligibility information;
  - any court orders;
  - volunteer information;
  - photos and videos at College events; and
- job applicants, staff members, volunteers and contractors such as:
  - 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 College 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 College, including name and contact details and any other information necessary for the particular contact with the College.

**Personal Information provided by an individual:** The College will generally collect personal information through a number of ways, including but not limited to:

- forms filled out by parents or students;
- face to face meetings including interviews;
- electronic means including emails and telephone calls;
- consent forms;
- written communication to the College;
- website notification or on-line tools such as apps;
- photographs and videos;
- people other than parents and students.

**Personal Information provided by other people:** In some circumstances the College 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. The type of information the College may collect from another school may include academic records and/or achievement levels and any other information that may be relevant to assisting the College to meet the needs of the student.

**Exception in relation to employee records:** Under the *Privacy Act 1988 (Cth)*, this Privacy Policy does not apply to the College's treatment of an employee record, where the treatment is directly related to the current or former employment relationship between the College and employee.

#### 4.2 Use of personal information

The College will use personal information it collects from an individual 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 an individual has consented.

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

The purposes for which the College uses personal information of students and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after students' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the College;
- to contribute to aggregated data that the Catholic Education South Australia (CESA) or the South Australian Commission for Catholic Schools Inc. (SACCS) may require from time to time to meet their reporting, planning, contract and funding responsibilities on behalf of schools;
- to satisfy the College's legal obligations and allow the College to discharge its duty of care; and
- to satisfy the College service providers' legal obligations, including Jesuit Education Australia (JEA) and the Society of Jesus in Australia (SOJA).

In some cases where the College requests personal information about a student or parent, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the student or permit the student to take in a particular activity.

**Job applicants, staff members and contractors:** In relation to personal information of job applicants, staff members and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the College uses personal information of job applicants, staff members and contractors include:

- administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for the College;
- satisfying the College's legal obligations, for example, in relation to child protection legislation;
- to contribute to aggregated data that SACCS and the CESA use to meet their reporting, planning, contract and funding responsibilities;
- to enable SACCS and the CESA to maintain necessary staff information for entitlements including long service leave, maternity leave;
- 'Return to Work' and other necessary industrial employment purposes and for accreditation and funding purposes; and
- to satisfy the College service providers' legal obligations, including Jesuit Education Australia (JEA) and the Society of Jesus in Australia (SOJA).

**Volunteers:** The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as the Parents and Friends Association and Old Ignatians' Association etc., to enable the College and the volunteers to work together.

**Marketing and fundraising:** The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to be a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising, for example, the College's Advancement Office or the Parents and Friends Association.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

#### 4.3 Disclosure and storage of personal information

The College may disclose personal information, including sensitive information in accordance with section 4.4 of this Policy, held about an individual for educational, administrative and support purposes. This may include but is not limited to:

- service providers which provide educational, support and health services to the College (either at the College or off campus) including Catholic Education South Australia (CESA), the Catholic Education Commission (CEC), other related church agencies/entities like insurance, specialist visiting teachers, volunteers, counsellors, consultants, coaches and providers of learning and assessment tools;
- third party service providers that provide online educational and assessment support services, information technology services, administrative and financial services, document and data management services or applications to schools and school systems and, where necessary, to support the training of selected staff in the use of these services;
- other third parties which the College uses to support or enhance the educational or pastoral care services for its students or to facilitate communication with parents;
- Jesuit Education Australia (JEA) and Society of Jesus in Australia (SOJA);
- another school including its teachers, for example to facilitate the transfer of a student;
- state and federal government departments and agencies (including for statement and funding purposes);
- health service providers including medical professionals;
- recipients of College publications such as newsletters and magazines;

- students' parents or guardians and their emergency contacts;
- 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);
- anyone you authorise the College to disclose information to;
- anyone who the College is required or authorised to disclose the information by law, including child protection laws.

Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising. Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications like newsletters and magazines, which include personal information, may be used for marketing purposes.

Applications, online services and other data providers which the College currently provides personal information include:

- Google Aps for Education;
- Microsoft Office 365; and
- Other cloud hosted services where student data resides.

These online service providers may be located in or outside of Australia. The College will take reasonable steps to ensure that these online service providers do not disclose or use the personal information for any purpose other than for the benefit of the College in accordance with this policy.

***Sending and storing information overseas:*** The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a College exchange, immersion or placement. However, the College 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.

#### 4.4 Treatment of sensitive information

'Sensitive information' means information relating to a person's racial or ethnic origin, political opinions, religion, trade unions 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 the individual agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

#### 4.5 Management and security of personal information

College staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information held from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods. These include the locked storage of hard copy files, password access rights to computerised records and the secure disposal of records when they are no longer required.

The College recommends that all individuals, including parents and the College community, adopt secure practices to protect themselves such as ensuring passwords are strong and regularly updated and that your log in details are kept secure. Personal information should not be shared with anyone without first verifying their identity and organisation.

#### 4.6 Access and correction of personal information

The College endeavours to ensure that the personal information it holds is accurate, complete and up to date. Annually, the College will invite families to check and confirm that all personal information is correct. For overseas students, the College Registrar will contact families for written confirmation of student contact details, including address, mobile phone number and email address bi-annually.

In addition, under the Commonwealth *Privacy Act 1988 (Cth)*, an individual has the right to seek and obtain access to any personal information that the College holds about them and to advise the College 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.

In addition, if practical or unless otherwise required by law, the College will endeavour to notify any third parties of changes to personal information previously disclosed to them in accordance with this Policy.

***To make a request to access or update any personal information the College holds about you or your child, please contact the College's Privacy Officer by telephone or in writing. (refer Section 4.8 for contact details)***

The College may require you to verify your identity and specify what information you require. The College will respond to a request for access to personal information within 30 days. 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, the College will advise the likely cost in advance.

If the College cannot provide you with access or correct that information, you will be provided with written notice explaining the reasons for refusal.

#### 4.7 Consent and rights of access to the personal information of "students"

The College respects every parent's right to make decisions concerning their child's education.

Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The College 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 the College about them or their child by contacting the College's Privacy Officer by telephone or in writing. (refer Section 4.8 for contact details).***

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 College's duty of care to the student.

The College may, at its discretion, on the request of a student grant that student access to information held by the College 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 student's personal circumstances warrant it.

#### 4.8 Nationally Consistent Collection of Data (NCCD) on School Students with Disability

The College is required by the Federal Australian Education Regulation 2013 (Cth) and Australian Education Act 2013 (Cth) to collect and disclose certain information under the Nationally Consistent Collection of Data (NCCD) on students with a disability. The College provides the required information at an individual student level to the *Students with Disability Inclusion and Learning Team* at Catholic Education South Australia (CESA), as an approved authority. This information is in accordance with the terms and conditions between the South Australian Commission for Catholic Schools Inc and Saint Ignatius' College (Adelaide) Ltd Data Sharing Deed. Approved authorities must comply with reporting, record keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

#### 4.9 Student Residential Address Collection for Commonwealth Funding Arrangements

The College is required by the Australian Education Regulation 2013 (Cth) (Regulation) to provide a 'statement of addresses' to the Australian Government of Education, Skills and Employment. This collection is routinely used to inform Commonwealth school education policy and to help ensure that Commonwealth funding arrangements for non-government schools are based on need and are fair and transparent. Information provided to the federal government for this purpose does not explicitly identify any student with residential addresses. This ensures that your personal information is protected by law, including the *Privacy Act 1988 (Cth)*.

#### 4.10 Enquiries and Complaints

If you would like further information about the way the College manages the personal information it holds or wish to complain that you believe the College has breached the Australian Privacy Principles, please contact the College's Head of Business, who acts as the College's Privacy Officer, by:

- Emailing: [s.trenerry@ignatius.sa.edu.au](mailto:s.trenerry@ignatius.sa.edu.au)
- Calling: 8334 9300
- Writing to the Privacy Officer at the following address:  
Privacy Officer  
Saint Ignatius' College  
2 Manresa Court  
ATHELSTONE SA 5076

If practical and not otherwise required by law, ***an individual can contact the College anonymously or by using a pseudonym***. However, if an individual chooses not to identify themselves, the College 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.

The College will investigate any complaint and will notify you of a decision in relation to your complaint as soon as practicable after it has been made.

#### 4.11 Mandatory Breach Notification

The College acknowledges the Privacy Amendment (Notifiable Data Breaches) Act 2017 and has developed a Data Breach Procedure and Response Plan. The College will manage the process of dealing with an actual or suspected breach in accordance with this Plan with guidance from Catholic Education South Australia (CESA).

If you are not satisfied with the College's response, you may refer the complaint to the Office of the Australia Information Commissioner (OAIC) by visiting the following website and following the steps: <http://www.oaic.gov.au/privacy/privacy-complaints>. A referral to OAIC should be a last resort once all avenues of resolution have been exhausted.



## 5. ROLES AND RESPONSIBILITIES

### 5.1 College Board

Responsible for approving this Policy.

### 5.2 Risk and Compliance Board Committee

Responsible for reviewing and recommending amendments to the Policy for approval by the College Board.

### 5.3 Principal

Responsible for the implementation of the Policy.

### 5.4 Head of Business

Is the College's "Privacy Officer" and is responsible for:

- receiving requests for access or updates to personal information referred to in the Policy,
- receiving and managing enquiries and complaints in relation to the Policy and/or its application.

### 5.5 Risk and Compliance Officer

Is the College's "Privacy Co-ordinator" and is responsible for:

- co-ordinating the review and amendments to the Policy;
- assisting staff in the implementation of the Data Breach Procedure and Response Plan if required.

## 6. RELATED LEGISLATION, DOCUMENTS, RESOURCES

### Legislation

- Privacy Act 1988 (Cth) (including National Privacy Principles)
- Privacy Amendment (Notifiable Data Breaches) Act 2017

### College Documents

- Code of Conduct
- Data Breach Procedure and Response Plan  
Data Sharing Deed between South Australian Commission for Catholic Schools Inc and Saint Ignatius' College (Adelaide) Ltd

### Resources

- Catholic Education South Australia (CESA) – 'Privacy Statement for Separately Incorporated Schools (generic)' and the 'Privacy Compliance Manual'
- Office of the Australia Information Commissioner (OAIC)

## 7. DOCUMENT AVAILABILITY, REVIEW AND UPDATES

The College will review this Policy at least tri-annually. It may also amend the Policy from time to time to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing school environment.

The College will not notify parents each time the Policy is changed. **The most recent version will be maintained on the College's website.**

## 8. REVISION RECORD

<b>Document Title</b>	Privacy Policy
<b>Document Category</b>	College Policy
<b>Revision Number</b>	Version 1.5
<b>Original Approval Document Date</b>	2008
<b>Process Owner</b>	College Leadership Team
<b>Contact</b>	Sam Trenerry, Head of Business 8334 9322, s.trenerry@ignatius.sa.edu.au
<b>Approval Authority</b>	College Board/Risk & Compliance Committee
<b>Revision Approval Date</b>	May 2021 (R&C Committee)
<b>Review Date</b>	May 2024
<b>Revision History</b>	2008, 2014, 2017, March 2019 May 2021 to include Data Sharing Deed

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