

1. Purpose

This Privacy Policy details how the College protects privacy and how it complies with the requirements of the Privacy Act 1988 (the Privacy Act) and the 13 Australian Privacy Principles contained in the Privacy Act.

This policy also describes:

- who the College collects information from
- the types of personal information collected and held
- how this information is collected and held
- the purposes for which personal information is collected, held, used and disclosed
- how to access and correct personal information
- how complaints or inquiries about the College's collection, handling, use or disclosure of personal information can be made, and how that complaint or inquiry will be handled
- whether the College is likely to disclose your personal information to any overseas recipients.

2. Personal information handling practices

2.1. What is personal information and how does the College collect it?

Personal information is information or an opinion about an individual from which they can be reasonably identified.

Depending on the circumstances, Mazenod College may collect personal information from students, parents, prospective parents, job applicants, staff, volunteers and others including alumni, contractors, visitors and others that come into contact with the school.

It is noted that employee records are not covered by the Australian Privacy Principles where they relate to current or former employment relations between the school and the employee.

2.2. Types of personal information collected

The kinds of personal information collected is largely dependent upon whose information the College is collecting and the College is collecting it, however in general terms the school may collect:

- 2.2.1. **Personal information** including names, addresses and other contact details; dates of birth; next of kin details; financial information, photographic images and attendance records.
- 2.2.2. **Sensitive information** (particularly in relation to student and parent records) including religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, professional or union memberships, family court orders and criminal records.
- 2.2.3. **Health information** (particularly in relation to student and parent records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements.

2.3. How the College collects personal information

How the College collects personal information will largely be dependent upon whose information is collected. If it is reasonable and practical to do so, the College collects personal information directly from you.

2.3.1. Solicited information

Where possible the school has attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form or a Health Information Disclosure Form). However, given the nature of our operations, it often also receive personal information by email, letters, notes, over the telephone, in face to face meetings, through financial

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transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring.

The College may also collect personal information from other people (e.g. a personal reference) or independent sources (e.g. a telephone directory), however it will only do so where it is not reasonable and practical to collect the information from you directly.

The College may collect information based on how individuals use its website. It may use 'cookies' and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns and to record statistics on web traffic. The College does not use information to personally identify individuals.

2.3.2. **Unsolicited information**

Sometimes the school may be provided with your personal information without having sought it through our normal means of collection. This is referred to as 'unsolicited information'. Where the College collects unsolicited information it will only hold, use and/or disclose that information if it could otherwise do so had it have been collected by normal means. If that unsolicited information could not have been collected by normal means then it is destroyed, permanently deleted or de-identified as appropriate.

2.4. **How personal information is used**

The College only uses personal information that is reasonably necessary for one or more of its functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Primary uses of personal information include but are not limited to:

- providing education, pastoral care, extra-curricular and health services
- satisfying College legal obligations including duty of care and child protection obligations
- keeping parents informed as to school community matters through correspondence, newsletters and magazines
- marketing, promotional and fundraising activities
- supporting the activities of school associations such as The Mazenod Old Boys (The MOB)
- supporting the activities of the Parents and Friends Association
- supporting community based causes and activities, charities and other causes in connection with the school's functions or activities
- helping to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis
- school administration including for insurance purposes
- the employment of staff
- the engagement of volunteers.

2.5. **How sensitive information is collected and used**

The College only collect sensitive information reasonably necessary for one or more of these functions or activities, if it have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat 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.

The College may request medical reports and health information about students from time to time to discharge its legal duty of care to the student and to other students and staff. This includes a student's medical action plans (for example asthma and anaphylaxis), as well as any other health or medical information which is reasonably likely to impact on the College's ability to provide educational, first aid and related services.

A student's health and medical information will be disseminated and used within the College to best meet the College's duty of care responsibilities. This may include photographs with health action plan to facilitate the identification of students who may be at heightened risk.

If the College does not have the relevant consent and a permitted health situation or permitted general situation does not exist, then it may still collect sensitive information provided it relates solely to individuals who have regular contact with the College in connection with its activities. These individuals may include students, parents, volunteers, former students and other individuals with whom the College has regular contact in relation to our activities.

The College will only use or disclose sensitive information for a secondary purpose if you would reasonably expect it to use or disclose the information and the secondary purpose is directly related to the primary purpose.

2.6. Storage and data security

The College stores personal information in a variety of formats including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras, other recording devices and third party storage providers such as cloud storage facilities.

The security of your personal information is of importance to the College and all reasonable steps are taken to protect the personal information held 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 and 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 school buildings and grounds to prevent break-ins
- implementing ICT and cyber 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 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 held that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

The College website may contain links to other websites. It does not share your personal information with those websites and is not responsible for their privacy practices. Please check their privacy policies.

2.7. Responding to data breaches

Mazenod College will take appropriate, prompt action if it has reasonable grounds to believe that a data breach may have, or is suspected to have occurred. Depending on the type of data breach, this may include a review of its internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If the school is unable to notify individuals, it will publish a statement on its website and take reasonable steps to publicise the contents of this statement.

2.8. Disclosing personal information

The College may disclose your personal information to government agencies, other parents, other schools, recipients of school publications, visiting teachers, counsellors and coaches, 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 the College to use or disclose your personal information in this way
- the College is 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
- another permitted health situation exists.

2.9. Personal information of students

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.

Mazenod 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/carers. It will treat notices provided to parents/carers as notices provided to students and will treat consents provided by parents/carers as consents provided by a student.

The school is however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older students and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents directly from students. The College also acknowledges that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the school's duty of care to the student.

2.10. Disclosure of personal information to overseas recipients

The College may disclose personal information about an individual to overseas recipients in certain circumstances, such as when it is organising an overseas excursion, facilitating a student exchange, or storing information with a 'cloud service provider' which stores data outside of Australia.

The College will however take all reasonable steps not to disclose an individual's personal information to overseas recipients unless the College:

- has the individual's consent (which may be implied); or
- is satisfied that the overseas recipient is compliant with the Australian Privacy Principles, or a similar privacy regime; or
- forms 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
- is taking appropriate action in relation to suspected unlawful activity or serious misconduct.

2.11. Ensuring the quality of your personal information

All reasonable steps are taken to ensure the personal information held, used and disclosed 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 the school maintains and updates personal information when advised by individuals or when it becomes aware through other means that their personal information has changed.

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

3. Accessing and correcting your information

You may request access to the personal information the school holds about you, or request that your personal information is changed, by contacting the College.

If the College does not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate the College will provide you with the reason/s for the decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and this will be attached to your record.

4. Privacy Complaints

If you wish to make a complaint about a breach by the College 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 the contact details noted below at Section 5. You may also make a complaint verbally or using the online [Feedback Form](#) on the College website.

The College will respond to your complaint within a reasonable time (usually no longer than 30 days) and may seek further information from you in order to provide a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner.

5. College Contacts

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

- Email: ronan.jeff@mazenod.wa.edu.au
- Telephone: (08) 9291 1500
- Fax: (08) 9291 6711
- Mail:
 - Privacy Officer
 - Jeff Ronan, Deputy Principal
 - 55 Gladys Road, Lesmurdie WA 6076

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

6. Privacy Policy Updates

This Privacy Policy is subject to change at any time. Please check the College website <http://web.mazenod.wa.edu.au> regularly for any changes.

This Privacy Policy was last updated: July 2018.

7. Review History

This policy will be reviewed every three years or in response to legislative changes.

Year	Reviewed by:	Amendments / Review
JULY 2018	CLT	Reformatting
2020	Review	