



Diocese of Toowoomba Catholic Schools Privacy Statement

Diocese of Toowoomba Catholic Schools (TCS) comprises 31 Catholic schools and colleges and the Catholic Schools Office. This Privacy Statement applies to these schools and colleges and the Catholic Schools Office (TCSO) and sets out how each school/college and TCSO manages personal information provided to or collected by it.

TCS is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act (1988).

TCS may from time to time, review and update this Privacy Statement to take account of new laws and technology, changes to school/college and TCSO operations and practices and to ensure it remains appropriate to the changing school/college and TCSO environment.

What kinds of personal information is collected and how does a school/college or TCSO collect it?

The type of information schools/colleges and TCSO collect and hold includes (but is not limited to) personal information, including health and other sensitive information, about

- students and parents and/or carers (parents) before, during and after the course of a student's enrolment at the school/college
- job applicants, staff members, volunteers and contractors
- other people who come into contact with the school/college and TCSO.

Personal information you provide

A school/college will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents and students provide personal information.

TCSO will have access to the information provided to schools/colleges along with personal information that is collected from those who provide it to the TCSO directly.

If an enrolment application is made to two (or more) schools/colleges of TCS, the personal information provided during the application procedure may be shared between the schools/colleges. This personal information may include health information and is used for the purpose of considering and administering the enrolment of the student within TCS.

Personal information provided by other people

In some circumstances a school/college or TCSO 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/college. If a student transfers to a new school/college, the new school/college may collect personal information about the student from the student's previous school/college to facilitate the transfer of the student.

Exception in relation to employee records

Under the Privacy Act (1998), the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Statement does not apply to TCS'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 a school/college or TCSO use the personal information you provide?

A school/college or TCSO 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/college's primary purpose of collection is to enable the school to provide a quality Catholic education to the student. This includes satisfying the needs of parents, the needs of the student and the needs of TCSO and school throughout the whole period the student is enrolled at the school.

The purposes for which TCSO and its schools/colleges use 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, including seeking the payment of fees for schools/colleges within TCS when a student transfers between such schools/colleges
- looking after students' educational, social, spiritual and medical wellbeing
- seeking donations and marketing for the school
- to satisfy TCSO's and the school's/college's legal obligations and to allow schools/colleges and TCSO to discharge its duty of care.

In some cases, where a school/college 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, staff members and contractors

In relation to the personal information of job applicants, staff members and contractors, TCSO's and a school's/college's primary purpose of collection is to assess and (if successful) engage the applicant, staff member or contractor, as the case may be.

The purposes for which TCSO and a school/college uses personal information of job applicants, staff members and contractors include

- in administering the individual's employment or contract, as the case may be
- for insurance purposes
- seeking funds and marketing for individual schools/colleges and TCSO
- to satisfy TCSO's and school's/college's legal obligations, for example in relation to child protection legislation.

Volunteers

TCSO and schools/colleges also obtain personal information about volunteers who assist the TCSO and/or school/college in its functions or conduct associated activities, such as alumni associations, to enable the school/college and the volunteers to work together.

Marketing and fundraising

TCSO and schools/colleges treat marketing and seeking donations for the future growth and development of a school/college as an important part of ensuring that a school continues to be a quality learning environment in which students and staff thrive. Personal information held by a school/college may be disclosed to an organisation, solely to assist in raising funds for the school/college, for example the School's foundation or alumni organisation.

Exception in relation to related schools/colleges

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

With whom might a school/college or TCSO disclose personal information or store information?

A school/college or TCSO may disclose personal information, including sensitive information, held about an individual to

- another school/college, including a new school/college to which a student transfers to facilitate the transfer of the student, and schools within TCS where concurrent applications for enrolment are made to those schools/colleges
- government departments (including for policy and funding purposes)
- other schools/colleges within TCS or other dioceses, the Queensland Catholic Education Commission and other related church agencies/entities
- medical practitioners, including disclosing student and parent information to school health program providers for the purposes of providing school health programs (immunisation and dental)
- people providing educational, support and health services to the school/college, 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 may disclose it to the entity that manages the online platform for NAPLAN)
- people and organisations providing administrative, technology and financial services to the school/college and/or TCSO
- recipients of school/college and TCSO publications, such as newsletters and magazines
- students' parents or carers
- anyone you authorise the school/college or TCSO to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Sending information overseas

A school/college or TCSO may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers situated outside Australia or to facilitate a school/college exchange. However, a school/college or TCSO will not send personal information about an individual outside Australia without

- obtaining the consent of the individual (in some cases, the consent will be implied) or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Storage and access as part of centralised information

The school/college and TCSO uses centralised information management and storage systems (Systems). These Systems are provided by Catholic Education Network (CENet) and third-party service providers. CENet is owned by the Catholic Dioceses. Personal information is stored with and accessible to CENet and the third-party service providers for the purpose of providing services to the school/college and TCSO in connection with the Systems and for CENet, administering the education of students.

Online and cloud service providers

The school/college and TCSO may use online or 'cloud' service providers to store personal information and to provide services to the school/college or TCSO that involve the use of personal 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, some of which may be situated outside Australia.

An example of such a cloud service provider is Microsoft 365. Microsoft 365 provides apps for education including email, and stores and processes limited personal information for this purpose. School/college and TCSO staffs and its service providers may have the ability to access, monitor, use or disclose emails, communications (eg instant messaging), documents and associated administrative data for the purposes of administering Microsoft 365 and ensuring its proper use.

How does a school/college and TCSO treat sensitive information?

In referring to 'sensitive information' a school/college and TCSO 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, criminal record, 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 sensitive information is allowed by law.

Management and security of personal information

TCSO and school/college staffs are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

Each school and the TCSO has in place steps to protect the personal information the school and TCSO 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 Privacy Act (1988), an individual has the right to obtain access to any personal information which TCSO or a school/college holds about them and to advise TCSO or the school/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.

To make a request to access or update any personal information that TCSO or a school holds about you or your child, please contact

- for schools - the school's principal in writing
- for TCSO - the Executive Director: Catholic Schools in writing

The school/college or TCSO will require you to verify your identity and specify what information you require. The school/college or TCSO 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/college or TCSO will advise the likely cost in advance. If the school/college or TCSO cannot provide you with access to that information, the school/college or TCSO will provide you with a written notice explaining the reasons for refusal, unless given the grounds for refusal it would be unreasonable to provide reasons.

Consent and rights of access to the personal information of students

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

Generally, a school/college or TCSO will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. A school/college or TCSO 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.

As mentioned above, parents may seek access to personal information held by a school/college or TCSO about them or their child by contacting the school's/college's principal or Executive Director: Catholic Schools. However, there will be occasions when access is denied. Such occasions would include where the 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/college's duty of care to the student. A school/college or TCSO may, at its discretion, on the request of a student grant that student access to information held by the school/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 the student's personal circumstances so warranted.

Enquiries and complaints

If you would like further information about the way TCSO or a school/college manages the personal information it holds or wish to make a complaint that TCSO or a school/college has breached the Australian Privacy Principles, please contact the school's/college's principal or Executive Director: Catholic Schools. TCSO or the school/college 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.

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