



Privacy Policy

College Mission

Cabra Dominican College is a Catholic School in the Dominican tradition. It strives to provide an environment that nurtures and develops young people's unique gifts: liberating them in the search for truth, and empowering them to create a better world. Cabra Dominican College is committed to providing an environment in which all students feel welcomed, safe and valued.

Context

In realising its mission and vision Cabra Dominican College, (Cabra,) seeks to protect the personal and health information of students, parents, caregivers, staff, contractors and volunteers. This is the College's legal and ethical responsibility. Cabra will abide by the principles in the Commonwealth's Privacy Act 1988, as amended by the Privacy Amendment Act (Enhancing Privacy Protection) 2012, and the 13 Australian Privacy Principles (APPs), and exercise all reasonable care in order to protect the personal and health information of students and staff.

Policy Statement

Individuals' privacy is important. This Privacy Policy outlines how the College uses and manages personal information provided to or collected by it. The College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988, as amended by the Privacy Amendment Act (Enhancing Privacy Protection) 2012, and the 13 Australian Privacy Principles (APPs).

The College may, from time to time, review and update this Privacy Policy to take account of new laws and technologies, changes to its and the College's operations and practices and to make sure the policy remains appropriate to the changing school environment.

Scope

This policy applies to all students, parents/caregivers and is supported by staff working within or for Cabra Dominican College.

Definitions

Personal information is information or an opinion about an individual from which they can be reasonably identified. Depending on the circumstances, we may collect personal information from the individual in their capacity as a student, contractor, volunteer, stakeholder, job applicant or in some other capacity.

In the course of providing services we may collect and hold:

- Personal Information including names, addresses and other contact details; dates of birth; and financial information.
- Sensitive Information including government identifiers (such as Tax File Number (TFN)), nationality, country of birth, professional memberships, family court orders and criminal records.
- Health Information (particularly in relation to prospective staff and customer records) including medical records, disabilities, immunisation details and psychological reports.

As part of our recruitment processes for employees, contractors and volunteers, we may collect and hold:

- Personal Information including names, addresses and other contact details, dates of birth, financial information, citizenship, employment references, regulatory accreditation, media, directorships, property ownership and driver's licence information.
- Sensitive Information including government identifiers (such as TFN), nationality, country of birth, professional memberships, family court orders and criminal records.
- Health Information (particularly in relation to prospective staff and student records) including medical records, disabilities, immunisation details and psychological reports.

Principles

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

- students and their parents and/or caregivers before, during and after the course of a student's enrolment at the College;
- job applicants, staff members, volunteers and contractors;
- other people who come into contact with the College.

Personal information provided by an individual

- The College will generally collect personal information held about an individual through standardised collection methods (e.g. specifically designed forms filled out by parents or students). We also receive personal information through other methods (e.g. face-to-face meetings and interviews, email, telephone calls, through financial transactions, and via the College app, website and Consent2Go).

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 or from the Catholic Education Office. However, we will only do so where it is not reasonable and practical to collect the personal information from the individual directly.
- Exception in relation to employee records.
- This Privacy Policy does not apply, and the Australian Privacy Principles do not bind Cabra, in relation to the College's treatment of an employee record, where the treatment is directly related to the current or former employment relationship between Cabra and the employee.

Information collected from our website/app/newsletter

We may collect information based on how individuals use our website. We 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. We do not use this information to personally identify individuals.

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

For personal information about students and parents, the College's primary purpose of collection is to enable the College to provide schooling for the student. This includes satisfying both the needs of parents and the needs of the student 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 look after students' educational, social, spiritual and medical wellbeing;
- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day to day administration;
- in marketing publications;
- to refer unpaid debts to a debt collection agency;
- to contribute to aggregated data that the Catholic Education Office 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 seek specialised advice from the Catholic Education Office in relation to the students' educational, social, spiritual and medical wellbeing;
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

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.

Job applicants, staff members and contractors

For personal information about 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:

- To administer the individual's employment or contract (as the case may be)
- For insurance purposes
- to seek funds and marketing for Cabra
- to contribute to aggregated data that the Catholic Education Office and SACCS use to meet their reporting, planning, contract and funding responsibilities
- to enable the Catholic Education Office and SACCS to maintain necessary staff information for entitlements including long service leave, maternity leave, workers compensation and other necessary industrial or employment purposes, and for accreditation and funding purposes
- to satisfy the College's legal obligations (for example, in relation to child protection legislation).

Volunteers

Cabra also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as committees and Old Scholars Associations, 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. 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.

The Privacy Act 1988 allows the College to share personal information with any other College which is owned and operated and administered by the same incorporated body as detailed in the opening paragraph. In the case of this College, this will not apply, as the College is a single entity.

The College may disclose personal information (including sensitive information) held about an individual to:

- another College operated by the same incorporated body (if any);
- the Catholic Education Office in South Australia;
- SACCS;
- another congregational school;
- a school operated by the Catholic Education Office for the Archdiocese of Adelaide;
- a school operated by the Catholic Diocese of Port Pirie Incorporated;
- Catholic Church Insurances;
- Government departments;
- the local parish;
- people providing services to the College (including specialist visiting teachers, consultants and sports coaches);
- recipients of College publications, like newsletters and magazines;
- parents and caregivers;
- anyone to whom the individual authorises the College to disclose information.

Sometimes the College may ask individuals to consent to some disclosures or uses of personal information for certain purposes, either in writing or verbally. In other cases, consent may be implied.

- sending information overseas.

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.

How will sensitive information be treated?

“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, sexual preferences or criminal record, which is also personal information; and health 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.

Storage, management and security of personal information

Cabra stores Personal Information in a variety of formats including, but not limited to:

- databases
- hard copy files
- personal devices, including laptop computers
- third party storage providers such as cloud storage facilities
- paper based files.

Cabra takes all reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. These steps include, but are not limited to:

- Restrict access and user privilege of information by staff depending on their role and responsibilities.
- Password protect access rights to computerised records.
- Instruct staff not to share personal passwords.
- Store hard copy files in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege.
- Secure access to Cabra’s premises.
- Implement and review IT and cyber security systems, policies and procedures.
- Instruct staff to comply with internal policies and procedures when handling the information.
- Undertake due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.
- The destruction, deletion or de-identification of personal information we hold that is no longer needed, or required to be retained by any other laws.

Consent2Go

Cabra utilises the services of Consent2Go in the administration of excursions and associated health records. Please read the accompanying document MCB School General Privacy Policy from the Consent2Go parent company for further information.

Updating personal information

The College endeavours to ensure that the personal information it holds is accurate, complete and up to date. Throughout their time at Cabra, families are asked to inform the College of any changes to their personal or the student’s health information. They can do this by informing the College Administration Office via Student Services, or the student’s homeroom teacher. Changes to health information should be directed to the College’s Health Officer, via Student Services. Any changes to personal and health information must be made in writing.

Consent to use images

Cabra Dominican College has a number of communications outlets in which students’ images may be used. These include the College website, Veritas yearbook, the College app, the official College Facebook page, magazines and newsletters.

- Upon enrolment, parents complete a Privacy and Consent Form which asks for their consent to use the student’s image in any of these various outlets. Parents may withdraw this permission at any time throughout the student’s time at the College. As outlined in Cabra’s Social Media Guidelines, Any persons appearing in

images within our social media platform must have current consent according to our Privacy and Consent Form.

- In the event that an individual's name should be used in content, prior permission must be given by that individual, with a record of either email or written consent.
 - If the individual is an adult a full name may be used.
 - If the individual is a student, then only a first name will be used, unless it is deemed otherwise appropriate by the principal (eg naming House Captains, Success stories, formal award winners).

If the College receives a request to use student images or work by outside agencies such as the Catholic Education Office or SACE office, we seek a separate permission from parents. Therefore, the permissions contained in this booklet only refer to the use of student work and images in Cabra Dominican College publications.

Individuals have the right to check what personal information the College holds about them

Under the Privacy Act 1988, individuals may seek access to any personal information that the College holds about them and to advise of any perceived inaccuracy. There are some exceptions to this right set out in the Privacy Act 1988. Students will generally have access to their personal information through their parents. For individuals to make a request to access any information the College holds about them, they should contact the Principal's Assistant in writing. The College may require individuals to verify their identity and specify what information they require. A fee may be charged to cover the cost of verifying the individual's application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the individual will be advised of the likely cost in advance.

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 Principal's Assistant. However, there will 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 student involved has reached 18 years of age, but the College could do so in other circumstances when the maturity of the student and/or the student's personal circumstances so warranted.

For further information about the way the College manages the personal information that it holds, please contact the Principal's Assistant.

Responding to data breaches

Cabra will take appropriate, prompt action if we have 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 our internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC). If we are unable to notify individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

Disclosure of personal information

Personal information is used for the purposes for which it was given to Cabra, or for purposes which are directly related to one or more of our functions or activities. Personal information may be disclosed to government agencies, related entities and other recipients from time to time, if the individual:

- Has given consent; or
- Would reasonably expect the personal information to be disclosed in that manner.

Cabra may disclose personal information without consent or in a manner which an individual would reasonably expect if:

- We are required to do so by law.
- The disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety.
- Another permitted general situation applies.
- Disclosure is reasonably necessary for a law enforcement related activity.
- Another permitted health situation exists.

Access and correction of personal information

Individuals may submit a request to us to access the personal information we hold, or request that we change the personal information. Upon receiving such a request, we will take steps to verify the individual's identity before granting access or correcting the information.

If we reject the request, the individual will be notified accordingly. Where appropriate, we will provide the reason/s for our decision. If the rejection relates to a request to change personal information, an individual may make a statement about the requested change and we will attach this to their record.

Lodging a complaint

An individual can make a complaint about how Cabra manages personal information by notifying us in writing as soon as possible. We will respond to the complaint within a reasonable time (usually no longer than 30 days) and we make seek further information in order to provide a full and complete response.

If the individual is not satisfied with our response, they may refer the complaint to the Office of Australian Information Commissioner (OAIC). A complaint can be made using the OAIC online Privacy Complaint form https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC or by mail, fax or email.

Responsibilities

- It is Cabra's responsibility to keep personal and health information private and secure.
- It is the responsibility of students and their parents and caregivers to inform Cabra of any changes to personal or health information, in writing and in a timely manner.
- We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up-to-date, including at the time of using or disclosing the information.
- If Cabra becomes aware that the Personal Information is incorrect or out of date, we will take reasonable steps to rectify the incorrect or out of date information.

Related Documents and References

- CESA Privacy Policy (2014)
- National Catholic Education Commission and National Council of Independent School's Association Privacy Compliance Manual (2014)
- Privacy Amendment Act (2012)
- Commonwealth's Privacy Act (1988)
- Australian Privacy Principles <https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles>

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