



## Privacy Policy

### 1 Context

In realising its mission and vision, Cabra Dominican College seeks to protect the personal and health information of students, parents, caregivers, Employees, and contractors. This is the College's legal and ethical responsibility.

### 2 Policy Statement

- 2.1 Individuals' privacy is important. This Policy outlines how Cabra uses and manages Personal Information provided to, or collected by, it.
- 2.2 Cabra acknowledges that it is bound by, and will therefore abide by, principles in the *Privacy Act 1988* (Cth) and the Australian Privacy Principles. To this end, Cabra will exercise all reasonable care in order to protect the personal and health information of students and Employees.
- 2.3 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.

### 3 Definitions

**Employee** has its ordinary meaning, but in the context of this policy also includes a potential employee, volunteers, or potential volunteers.

**Personal Information** has the meaning given in the Australian Privacy Principles. In Cabra's context, Personal Information may include Sensitive Information about:

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

**Privacy Impact Assessment** means a risk assessment conducted using the framework provided by Catholic Education South Australia to assess the potential implications for privacy in a proposed course of action.

**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.

### 4 Scope

- 4.1 This policy applies to all students, parents/caregivers and Employees of Cabra Dominican College.

## 5 Principles

### General Principles

- 5.1 The College may collect Personal Information provided by an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, email, telephone calls, and via the College app and Consent2Go.
- 5.2 The College may collect Personal Information provided by other people by way of a report provided by a medical professional or a reference from another school.
- 5.3 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.
- 5.4 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

- 5.5 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.
- 5.6 The purposes for which the College uses Personal Information of students and parents/caregivers include:
  - (a) to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
  - (b) day to day administration;
  - (c) to look after students' educational, social, spiritual and medical wellbeing;
  - (d) in marketing publications;
  - (e) to refer unpaid debts to a debt collection agency;
  - (f) 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;
  - (g) to seek specialised advice from the Catholic Education Office in relation to the students' educational, social, spiritual and medical wellbeing;
  - (h) to satisfy the College's legal obligations and allow the College to discharge its duty of care.
- 5.7 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, Employees and Contractors

- 5.8 For Personal Information about job applicants, Employees and contractors, the College's primary purpose of collection is to assess and, if successful, to engage the applicant, Employee or contractor, as the case may be.
- 5.9 The purposes for which the College uses Personal Information of Employees and contractors include:
- (a) to administer the individual's employment or contract (as the case may be);
  - (b) for insurance purposes;
  - (c) to seek funds and marketing for Cabra;
  - (d) to contribute to aggregated data that the Catholic Education Office and SACCS use to meet their reporting, planning, contract and funding responsibilities;
  - (e) to enable the Catholic Education Office and SACCS to maintain necessary Employees information for entitlements including long service leave, maternity leave, workers compensation and other necessary industrial or employment purposes, and for accreditation and funding purposes; and
  - (f) to satisfy the College's legal obligations (for example, in relation to child protection legislation).

## Marketing and Fundraising

- 5.10 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 Employees thrive.
- 5.11 Personal Information held by the College may be disclosed to an organisation that assists in the College's fundraising. As such, parents, Employees, contractors, and other members of the wider College community may from time to time receive fundraising information.
- 5.12 College publications, like newsletters and magazines, which include Personal Information, may be used for marketing purposes.

## Other Disclosures

- 5.13 The *Privacy Act 1988* (Cth) allows the College to share Personal Information with any other College which is owned and operated and administered by the same or a related body corporate. In the case of Cabra, this may involve disclosure to Dominican Education Australia.
- 5.14 The College may disclose Personal Information (including Sensitive Information) held about an individual to:
- (a) another College operated by the same incorporated body (if any);
  - (b) Catholic Education South Australia;
  - (c) SACCS;
  - (d) another school which belongs to Dominican Education Australia;
  - (e) a school operated by the Catholic Education Office for the Archdiocese of Adelaide;



- (f) a school operated by the Catholic Diocese of Port Pirie Incorporated;
- (g) Catholic Church Insurances;
- (h) Government departments;
- (i) the local parish;
- (j) people providing services to the College (including specialist visiting teachers, consultants and sports coaches);
- (k) recipients of College publications, like newsletters and magazines;
- (l) parents and caregivers; or
- (m) anyone to whom the individual authorises the College to disclose information.

5.15 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.**

- 5.16 The College will not send Personal Information about an individual outside Australia without:
- (a) obtaining the consent of the individual (in some cases this consent will be implied);
  - (b) conducting a Privacy Impact Assessment; or
  - (c) otherwise complying with the Australian Privacy Principles.

#### **Sensitive Information**

5.17 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.

#### **Management and security of Personal Information**

- 5.18 Cabra's Employees are required to respect the confidentiality of students' and parents' Personal Information and the privacy of individuals.
- 5.19 The Australian Privacy Principles require the College not to store Personal Information longer than necessary.
- 5.20 Cabra has in place steps to protect the Personal Information held from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

#### **Updating Personal Information**

- 5.21 The College endeavours to ensure that the Personal Information it holds is accurate, complete and up to date.
- 5.22 Throughout their time at Cabra, families are asked to inform the College of any changes to their Personal Information (including student health information). Families can do this by:
- (a) informing the College Administration Office via Student Services;
  - (b) the College registrar; or

(c) using self-serve function on Consent2Go,

Any changes to Personal Information must be made in writing.

### **Consent to Use Images**

- 5.23 Cabra Dominican College has a number of communications outlets in which students' images may be used. These include the College website, Veritas yearbook, the official College social media accounts, magazines, and newsletters.
- 5.24 Upon enrolment, parents complete a consent for publication via Consent2Go 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 students appearing in images within our social media platform must have current consent.
- 5.25 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 described in clause 5.23 and 5.24 above only refer to the use of student work and images in Cabra Dominican College publications.

### **Right to Check Personal Information Held**

- 5.26 Under the *Privacy Act 1988* (Cth), 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* (Cth).
- 5.27 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.
- 5.28 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**

- 5.29 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.
- 5.30 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.
- 5.31 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.

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

## 6 Related Documents and References

- [Australian Privacy Principles](#)
- Consent2Go MCB Schools General Privacy Policy
- *Privacy Act 1988* (Cth)

## 7 Revision Record

Document Title	Privacy Policy							
Document Type	Policy							
Document Date	November 2021							
Process Owner	Principal							
Contact	Dr Helen Riekie ( <a href="mailto:principal@cabra.catholic.edu.au">principal@cabra.catholic.edu.au</a> )							
Approval Authority	College Board							
Review Date	2024							
Policy Distribution	Website	✓	MS Teams	✓	SEQTA		BoardTrac	✓
Revision History	<b>Edition Number</b>		<b>Date</b>		<b>Description of change</b>			
	1.0		2018					
	2.0		2021		Review according to schedule. Minor amendments and revisions.			