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4.4.6 Privacy Policy

Your privacy is important

This Privacy Policy details how Iona Presentation College uses and manages personal information provided to or collected by it, how it protects your privacy and how we comply with the requirements of the Privacy Act and the 13 Australian Privacy Principles. This policy also describes:

- who we collect information from;
- the types of personal information collected and held by us;
- how this information is collected and held;
- the purposes for which your personal information is collected, held, used and disclosed;
- how you can gain access to your personal information and seek its correction;
- how you may inquire or complain about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled; and
- whether we are likely to disclose your personal information to any overseas recipients.

The College is bound by the 13 Australia Privacy Privacy Principles contained in the Commonwealth Privacy Act. The Freedom of Information Act does not apply to the Catholic Education Office of Catholic schools. However, individuals may access personal information under the Privacy Act (1988) to view documents held by the school.

The College may, from time to time, review and update this Privacy Policy 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 College environment.

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 College and the employee.

Who do we collect personal information from?

At Iona Presentation College we 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 College.

What kind of personal information does the College collect?

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

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

How does the College collect the personal information?

How the College collects personal information is largely be dependent upon whose information we are collecting. Where it is reasonable and practical to do so, we collect personal information directly from the persons concerned.

Where possible the College has attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form, Admission Form, Family Details Form or a Health Information Form). However, given the nature of our operations, the College will often also receive personal information by email, letters, notes, telephone calls, in face to face meetings, interviews, through financial transactions and through surveillance activities such as the use of CCTV security cameras, internet monitoring and email monitoring.

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

The College may also be provided with personal information without having sought it through our normal means of collection. This is referred to this as "unsolicited information". Where we collect unsolicited information we will only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate.

How the College uses personal information?

The College only uses personal information that is reasonably necessary for one or more of our 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.

Our primary uses of personal information include but are not limited to:

- providing education, pastoral care, extra-curricular and health services;
- satisfying our legal obligations including our duty of care and child protection obligations;
- keeping parents/guardians informed as to college community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;
- supporting the activities of college related associations, e.g. the Parent Network, Men of Iona, Friends of Music;
- supporting community based causes and activities, charities and other causes in connection with the College's functions or activities;

- helping us to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis;
- college administration including for insurance purposes;
- the employment of staff;
- the engagement of volunteers.

The College only collects sensitive information reasonably necessary for one or more of these functions or activities, if we 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.

If the College does not have the relevant consent and a permitted health situation or permitted general situation does not exist, then we may still collect sensitive information provided it relates solely to individuals who have regular contact with the College in connection with our 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 us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

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 pupils 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 Foundation or alumni organisation.

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.

Storage and Security of Personal Information

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 computing devices, mobile phones, cameras and other recording devices.

The security of personal information is of importance to the College and we take all reasonable steps to protect the personal information we hold 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 members 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 college buildings and grounds to prevent break-ins;
- Implementing ICT 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 members 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 we hold that is no longer needed is destroyed in a secure manner, deleted or de-identified as appropriate.

The College website and related student/parent portals may contain links to other external websites and portals. The College does not share personal information with those websites and is not responsible for their privacy practices.

When the College discloses personal information

The College only uses personal information for the purposes for which it was given to us, or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities. We may disclose personal information to government agencies, other parents, other colleges, recipients of college publications, visiting teachers, medical practitioners, counsellors and coaches, our 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 us to use or disclose your personal information in this way;
- we are 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.

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.

Iona Presentation 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/guardians. We will treat notices provided to parents/guardians as notices provided to students and we will treat consents provided by parents/guardians as consents provided by a students.

The College 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. We also acknowledge 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/guardians.

There may also be occasions where parents/guardians 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 College's duty of care to the student.

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 we are organising an overseas excursion, facilitating a student exchange, or storing information with a "cloud computing service" 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:

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

How we ensure the quality of your personal information

The College takes all reasonable steps to ensure the personal information we hold, use and disclose 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 we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Persons whom we hold personal information are asked to contact the College if any of the details they have provided changed, and that they should also contact us if they believe that the information we have about them is not accurate, complete or up to date.

How to gain access to your personal information we hold

You may request access to the personal information the College holds about you, or request that we change the personal information, by contacting us.

The College may require you to verify your identity and specify what information you require. The College 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 College will advise the likely cost in advance.

If we do 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 our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

Privacy Complaints

If you wish to make a complaint about a breach by us of the Australian Privacy you may do so by providing your written complaint by email, letter, facsimile or by personal delivery to any one of our contact details as noted below. You may also make a complaint verbally.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we 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.

How to Contact the College regarding this Policy

If you would like further information about the way the College manages the personal information it holds or this Privacy Policy, please contact the College Principal by:

- Emailing admin@iona.wa.edu.au
- Telephone (08) 9384 0066
- In writing addressed to the Principal, Iona Presentation College, 33 Palmerston Street, Mosman Park WA 6012
- By facsimile at (08) 9384 5191

If practical, you can contact us 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.