Definitions

‘Authorised CEDP employees’ means all employees:

- who have supervisory responsibilities for staff
- whose role includes appointment and induction of staff
- who manage CEDP third party contracts and engagement of contractors.

‘CEDP’ means Catholic Education Diocese of Parramatta. This includes our schools, Catholic Early Learning Centers (CELC), Catholic Out of School Hours Care services (COSHC) and offices.

‘Staff’ means employees and volunteers.

‘Student’ means a young person attending a CEDP school, CELC or COSHC.

1. Authorised CEDP employees must:
   - provide all prospective employees with the Employment Collection Notice (Appendix 4) when administering employee appointments
   - provide all volunteers and contractors with the Volunteer and Contractor Collection Notice when administering the engagement of volunteers or contracts (Appendix 5)
   - publish, implement and make accessible to all staff and contractors:
     - these procedures
     - Privacy - Guidelines
     - Privacy - Statement (Appendix 1)
     - Privacy Compliance Manual
     - Australian Privacy Principles (APPs) summary (Appendix 2).
   - publish, implement and make accessible to the public:
     - Privacy - Statement.

2. Principals, CELC directors and COSHC supervisors must:
   - be aware of and implement:
     - these procedures
     - Privacy - Guidelines
     - Privacy – Statement (Appendix 1)
     - Australian Privacy Principles (APPs) summary (Appendix 2)
     - Privacy Compliance Manual
   - provide each parent with:
     - Privacy – Statement (Appendix 1)
     - Standard Collection Notice (Appendix 3)
   - provide all prospective employees with the Employment Collection Notice (Appendix 4) when administering employee appointments (unless the employee has already been provided this notice under point 1, above)
   - provide all volunteers and contractors with the Volunteer and Contractor Collection Notice when administering engagement of volunteers or contracts (Appendix 5) (unless the contractor or volunteer has already been provided this notice under point 1, above)
   - provide all alumni with the Alumni Collection Notice (Appendix 6)
   - at enrolment and at the beginning of each school year request consent from Parents to have photographs/video/audio taken of their child and/or the Parents (Appendix 7) and ensure the consent is documented.

3. All staff and contractors dealing with private information must be aware of and apply the Privacy – Statement, Privacy - Guidelines and the Australian Privacy Principles (APPs) as relevant to their position.
Related documents

CATHOLIC SCHOOL COMMUNITY POLICY
- Privacy – Guidelines
- Privacy – Statement
  - Enrolment Application
- Privacy Manual, Catholic Education Commission NSW
- Responsible Use of ICT and Social Media - Procedures
- Responsible Use of ICT and Social Media for Staff - Guidelines
- Responsible Use of ICT and Social Media for Students - Guidelines
- Guide for NSW Non-Government Schools on Reporting, Disclosing and Exchanging Personal Information for the Purposes of Child Wellbeing, CEC

Relevant law

- Privacy Amendment (Enhancing Privacy Protection) Act 2012, Cth
- Ombudsman Act 1974, NSW
- Education Act 1990, NSW – Part 5A (health and safety risks arising from student behaviour)
- Children and Young Persons (Care and Protection) Act 1998, NSW
- Education Amendment (School Attendance) Act 2009, NSW
- Commission for Children and Young People Act 1998, NSW
Appendix 1: Privacy Statement
Available at: http://www.parra.catholic.edu.au/policy-central

Privacy statement
This statement sets out how the Catholic Education Diocese of Parramatta (CEDP) collects, uses and discloses personal information through our schools, Catholic Early Learning Centres (CELCs), Catholic Out of School Hours Care services (COSHCs) and offices.

What personal information do we collect and how?
We collect personal information, including health information and other sensitive information, about:

- students in our schools and children in our CELCs and COSHCs (together 'Students') and their parent/s, carer/s or guardian/s ('Parents') before, during and after enrolment
- employees and volunteers ('Staff'), contractors and job applicants, and
- other people who come into contact with us.

We will generally collect personal information via forms filled out by Parents or Students; file notes of face to face meetings, interviews or telephone calls; or correspondence with Parents or Students. Sometimes we may be provided with personal information by a third party, for example via a medical report or a reference from another school, care centre or an employer.

How will we use your personal information?
We will use your personal information for the primary purpose for which it was collected and for such other secondary purposes that are related to the primary purpose and reasonably expected.

We may use the personal information of Students and Parents:
- to assess enrolment applications, including assessing possible risks associated with known behaviour to safety of Students and Staff
- to facilitate a smooth transition of Students to our schools, CELCs and COSHCs, which may include a health and allergy management plan, preparing a behaviour management plan or other appropriate strategies aimed at meeting the particular needs of the Student
- to keep Parents informed about a Student's care, education and development
- to perform day to day administration
- to provide for Students' educational, social, spiritual and medical well-being and a safe learning environment
- to obtain donations and market our services
- to prepare State and national reports, and
- to discharge our schools', CELCs' and COSHCs' duty of care and our other legal obligations.

We may use the personal information of Staff and contractors:
- to administer employment processes and contracts
- to enable our Staff and contractors to work together with our schools, CELCs and COSHCs
- to obtain funds and market our services
- to provide a safe working and learning environment
- to discharge our legal obligations, and
- for insurance purposes.

We will also use the information for any purpose to which you have consented or that is required or authorised by law.
Photos
Photos/video/audio of Students are used for various communication media including CEDP, school, CELC, COSHC and Catholic Education Office websites, publications, newsletters, and enrolment posters. If any Parent does not want their child’s photo used in any of the above situations please inform the principal of the school the CELC director or the COSHC supervisor, as applicable.

To whom might we disclose your personal information?
We may share personal information between our schools, CELCs, COSHCs and offices, and to:

- another school or care center to which a student transfers
- government departments
- the local parish of the school, CELC or COSHC or your local parish
- medical practitioners
- organisations which assist us with fundraising and marketing, for example a school’s parish, foundation or alumni organisation
- service providers, for example counsellors, specialist visiting teachers and sports coaches
- other service providers, such as email service providers
- recipients of school publications like school newsletters and magazines
- Parents
- anyone you authorise us to disclose information to, and
- anyone to whom we are required or authorised to disclose the information by law, including to discharge our duty of care.

Why do we use and disclose information for marketing and fundraising?
Marketing and donations play an important part in creating current and future learning and caring environments in our schools, CELCs and COSHCs. For these reasons we may disclose personal information to organisations which assist us with fundraising, for example the school’s parish, foundation or alumni organisation.

Parents' occupation and education - National goals for schooling
Information about Parents’ occupations and education is accessed by the Australian Curriculum, Assessment and Reporting Authority (ACARA) to meet the government’s National Goals for Schooling in the 21st century. These state that the achievement of students in schools should not be affected by discrimination based on sex, language, culture and ethnicity, religion or disability; or by differences arising from social and economic background or geographic location. The goals also state that ‘the learning outcomes of educationally disadvantaged students [should] improve and, over time, match those of other students’.

To help schools to achieve these goals, all Parents across Australia, no matter which school their child attends, are asked to provide information about family background. The main purpose of collecting this information is to promote an education system that is fair for all Australian students regardless of their circumstances.

We use the information to evaluate whether our policies are effective and to ensure that no group is experiencing undue disadvantage.

Providing information about Parents’ occupation and education is voluntary, but Parents’ information will help us to ensure that all students are being well served by our schools.

When will we send information overseas?
We will not send personal information outside Australia without:

- the consent (express or implied) of the individual, or their Parent where necessary, or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.
Our schools', CELCs', COSHCs' and office email systems are provided through Google Apps. Consequently emails and email account details may be transferred, stored and processed in the United States or any other country utilised by Google.

Our schools use a range of contemporary learning tools and latest technologies including Web 2.0 tools, Hubworks, cloud-based web services and apps for education. We may provide personal information to the relevant service provider in connection with the provision of these services. The service providers may be located, or store and process information, outside Australia, including in the United States, Singapore and Ireland.

Management and security of personal information
We have in place steps to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure by various methods such as locked storage of paper records and password access rights to electronic records. Security of information cannot be guaranteed due to the nature of the internet.

We endeavour not to store personal information for longer than necessary.

Access and correction of personal information
You may access information we hold about you and request that it be updated or corrected. Such requests should be made in writing to the school principal or the CELC director or the COSHC supervisor (as applicable) or the relevant director of service at the Catholic Education Office. We may require you to verify your identity and specify what information you require. We may charge you a fee to access your information to cover expenses of verifying your application and locating, retrieving and copying relevant records. If the information sought is extensive, we will advise the likely cost in advance. We will not charge you for the request or correction of your personal information.

There may be occasions when access to information is denied. Such occasions may include where the disclosure of information may have an unreasonable impact on others, for example if the disclosure breaches a school’s duty of care or the privacy of others. In certain circumstances, we may also refuse access to, or correction of, employee records applying exemptions under the Privacy Act.

Consent and right of access to personal information of Students by Parents
We treat consent given by Parents relating to personal information about Students as consent given by the Student and notices relating to personal information about Students given to Parents as notices given to the Student. An exception to this is when independently of Parents we may, at our discretion:

- give information we hold about a Student to that Student at his/her request, or
- allow a Student to give or withhold consent to release personal information about that Student.

This would normally be done only when the Student is of sufficient maturity and his/her personal circumstances warrant it.

There may be occasions where a Parent’s access to their child’s personal information 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 a school’s, CELC’s or COSHC’s duty of care to the Student.

How do we treat sensitive information?
We will only use and disclose sensitive information for the purpose for which it was provided or for a directly related secondary purpose, unless you agree otherwise or the disclosure is permitted by law.

Complaints
If you believe that we, including through one of our schools, CELCs or COSHCs, have contravened the Australian Privacy Principles and wish to complain, please contact the school, CELC or COSHC in the first instance if you are a Student or a Parent. Otherwise contact:
We may ask you to fill out our Complaint Form or otherwise put your complaint in writing.

We will investigate your complaint and will notify you of our decision in relation to your complaint as soon as is practicable after it has been made.

Complaint handlers will keep written records of the complaint resolution process and outcomes. Complaint records will be filed and stored appropriately.

The complainant may request a review of the process. The review will be undertaken by a person nominated by the Executive Director of Schools.

You may also submit your complaint to the Office of the Australian Information Commissioner.
Appendix 2: Australian Privacy Principles (APP)

Available at: http://www.parra.catholic.edu.au/policy-central

APPs are requirements about:
- the open and transparent management of personal information
- limiting the collection of personal information
- providing notice to individuals about the potential collection, use and disclosure of personal information
- using or disclosing personal information
- keeping personal information accurate, complete and up-to-date, including correcting information that is out-of-date, incomplete, irrelevant or misleading
- keeping personal information secure
- providing access to personal information

Openness

APP 1 Open and transparent management
An entity must implement practices, procedures and systems that ensure compliance with the APPs and enable handling of inquiries or complaints about compliance.

An entity must have a privacy policy. The privacy policy must contain specific information such as a privacy policy that informs about how the entity handles and protects personal information and its access, correction and complaint procedures. The policy must be available free of charge (eg website).

Collecting information

APP 2 Anonymity and pseudonymity
Individuals should be able to deal with an entity anonymously or by using a pseudonym, wherever practicable and lawful.

APP 3 Collection of solicited information
Information must only be collected if it relates to the entity’s functions or activities. Consent is usually required when collecting sensitive information.

APP 4 Dealing with unsolicited information
If an entity receives unsolicited information it must assess if it could have collected it under APP 3 and, if not, destroy or de-identify it.

APP 5 Collection notices
Collection notice must be provided when information is collected. It must contain specified information.

Storage and maintenance

APP 10 Data quality
Keep information accurate, up to date, complete and relevant.

APP 11 Data security
Protect information from misuse, interference, loss and unauthorised handling.

Use or disclosure of information

APP 6 Use and Disclosure
Sets out how information may be used and disclosed.

APP 7 Direct Marketing
Sets out when information may be used or disclosed for direct marketing and requirements to include opt out mechanisms.

APP 9 Identifiers
Places restrictions on the use of Commonwealth government identifiers.

APP 8 Cross-border disclosure
Regulates overseas transfer of personal information.

Access

APPs 12 and 13 Access and correction
An individual generally has the right to access and correct information that an entity holds about them. Some exceptions apply.
Appendix 3: Standard collection notice
Available at: http://www.parra.catholic.edu.au/policy-central

1. CEDP (through our schools, Catholic Early Learning Centres (CELCs), Catholic Out of School Hours Care services (COSHCs) and offices) collects personal information, including sensitive information about students in our schools, children in our care (together ‘Students’) and their parent/s, carer/s or guardian/s (‘Parents’) before and during the course of a Student’s enrolment. The primary purpose of collecting this information is to enable us to provide schooling and care for our Students.

2. Some of the information we collect is to satisfy our legal obligations, particularly to enable our schools, COSHC, CELC and offices to discharge their duty of care.

3. Certain laws governing or relating to the operation of schools and child care require that certain information is collected and disclosed. These include the Education Act and Public Health and Child Protection laws.

4. Health information about Students is sensitive information under the Privacy Act. We may request medical reports about Students from time to time. If we do not obtain the information we may not be able to enrol or continue the enrolment of the Student.

5. We may from time to time disclose personal information (including sensitive information) to others for administrative, care and educational purposes. This includes to other schools, government departments, government agencies, statutory boards, the CEO, the Catholic Education Commission, your local diocese and the parish. We may also disclose your personal information (including sensitive information) to government authorities such as the NSW Board of Studies, the Australian Curriculum, Assessment and Reporting Authority (ACARA), medical practitioners and people providing services to us, including specialist visiting teachers, sports coaches, volunteers and counsellors.

6. In addition to the agencies and purposes cited at 5 above, personal information relating to Students and Parents may also be made available, in accordance with Australian Government requirements, to ACARA for the purpose of publishing certain school information relating to the circumstances of Parents and Students on the MySchool website. The information published on the MySchool website is aggregated information and will not identify the Parent or Student.

7. Personal information collected from Students is regularly disclosed to their Parents. On occasions, information such as academic and sporting achievements, student activities and other news is published in School newsletters, our magazines, posters and websites.

8. Occasionally photographs or videos are taken of individual Students and groups of Students and these may be published. If you do not wish, or do not wish for your child, to be photographed, videoed or recorded under any circumstances, or to have your/their photographs, videos or sound recording published, please make sure you advise the principal, care centre director or our privacy officer. Contact details for our privacy officer are included at the end of this notice.

9. Our Privacy Statement sets out how you may access and seek correction of your personal information and how Parents may access and seek correction of personal information collected about their child. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of our schools’, CELCs’, COSHCs’ or offices’ duty of care to the Student, or where Students have provided information in confidence.

10. Our Privacy Statement also sets out how you may complain about a breach of privacy and how we will deal with such a complaint. Our Privacy - Statement is available at [Insert web address once published].

11. As you may know, we may from time to time engage in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in our fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.

12. We may include your contact details in a class list and our schools, COSHCs, CELCs and office directories.
13. If you provide us with the personal information of others, such as doctors’ or emergency contacts, we encourage you to inform them that you are disclosing that information to us and why, that they can access that information if they wish and that we do not usually disclose the information to third parties.

14. We may use service providers who provide certain services to us and our staff and Students, including data storage and contemporary online teaching tools. We may provide your personal information to such service providers in connection with the provision of these services. Such service providers may store, or process, data outside Australia, including in the United States, Singapore and Ireland. [APP5 requires names of all countries – to be provided re each service provider]. In addition, our email service provider may store and process emails in the United States or in any other country utilised by Google. [APP5 requires names of countries – to be provided].

15. You may obtain further information from the following:
   - For our schools: the school principal
   - For our CELCs: the CELC director
   - For our COSHCs: the COSHC supervisor
   - For our offices:

     Privacy Officer:
     Catholic Education Diocese of Parramatta
     Locked Bag 4
     North Parramatta NSW 1750
     T: 9840 5600.
Appendix 4: Employment collection notice

Available at: http://www.parra.catholic.edu.au/policy-central

1. When you apply for this position you will provide CEDP (through our schools, Catholic Early Learning Centres (CELCs), Catholic Out of School Hours Care services (COSHCS) and offices) with personal information.

2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may keep this information on file if your application is unsuccessful in case another position becomes available.

3. Our Privacy Statement sets out how you may access and seek correction of your personal information that we hold about you if you are unsuccessful for the position. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others. Our Privacy Statement also sets out how you may complain about a breach of privacy and how we will deal with such a complaint. Our Privacy Statement is available at: http://www.parra.catholic.edu.au/policy-central.

4. We may disclose this kind of information to the following types of organisations: the Catholic Education Commission of NSW and the Catholic Commission for Employment Relations. We will also disclose this information with your consent or as required or authorised by law.

5. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also elect to collect personal information about you in accordance with these laws.

6. We may use service providers who provide certain services to us and our staff and students including data storage and contemporary online teaching tools. We may provide your personal information to such service providers in connection with the provision of these services. Our service providers may store, or process, data outside Australia, including in the United States, Singapore and Ireland. [APP5 requires names of all countries – to be provided re each service provider]. In addition, our email service provider may store and process emails in the United States or in any other country utilised by Google. [APP5 requires names of countries – to be provided].

7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to us and why, that they can access that information if they wish and that we do not usually disclose the information to third parties.

8. You may obtain further information from the following:
   - For our schools: the school principal
   - For our CELCs: the CELC director
   - For our COSHCS: the COSHC supervisor
   - For our offices:
     Privacy Officer:
     Catholic Education Diocese of Parramatta
     Locked Bag 4
     North Parramatta NSW 1750
     T: 9840 5600.

[APP5 requires names of countries – to be provided].
Appendix 5: Volunteer and contractor collection notice

Available at: http://www.parra.catholic.edu.au/policy-central

1. In applying to provide your services you will be providing (through our schools, Catholic Early Learning Centres (CELCs), Catholic Out of School Hours Care services (COSHCs) and offices) with personal information.

2. If you provide us with personal information, for example your name and address or information contained on your resume or tender, we will collect the information in order to assess your application or tender. We may also make notes and prepare a confidential report in respect of your application or tender.

3. You agree that we may store this information for a reasonable period of time.

4. Our Privacy Statement sets out how you may access and seek correction of your personal information and how you may complain about a breach of the APPs. Our Privacy Statement is available on our website http://www.parra.catholic.edu.au.

5. We may disclose this kind of information to the following types of organisations: the Catholic Education Commission and Catholic Commission for Employment Relations. We will also disclose this information with your consent or as required or authorised by law.

6. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also elect to collect personal information about you in accordance with these laws.

7. We may use service providers who provide certain services to us and our staff and students including data storage and contemporary online teaching tools. We may provide your personal information to such service providers in connection with the provision of these services. Our service providers may store, or process, data outside Australia, including in the United States, Singapore and Ireland. [APP5 requires names of all countries – to be provided re each service provider]. In addition, our email service provider may store and process emails in the United States or in any other country utilised by Google. [APP5 requires names of countries – to be provided].

8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to us and why, that they can access that information if they wish and that we do not usually disclose the information to third parties.

9. You may obtain further information from the following:
   - For our schools: the school principal
   - For our CELCs: the CELC director
   - For our COSHCs: the COSHC supervisor
   - For our offices:
     Privacy Officer:
     Catholic Education Diocese of Parramatta
     Locked Bag 4
     North Parramatta NSW 1750
     T: 9840 5600.
Appendix 6: Alumni collection notice

Available at: http://www.parra.catholic.edu.au/policy-central

1. The [name] Alumni Association may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of [name of School] and to keep alumni members informed about other members.

2. We must have the information referred to above to enable us to continue your membership of the [name] Alumni Association.

3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by [name of School] to assist in its fundraising activities.

4. The [name] Alumni Association/We may publish details about you in our class lists, newsletters and our websites. If you do not agree to this you must advise the Privacy Officer now.

5. Our Privacy Statement sets out how you may access and seek correction of your personal information and how you may complain about a breach of the APPs. Our Privacy Statement is available on our website http://www.parra.catholic.edu.au.

6. CEDP may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.

7. We may use service providers who provide certain services to us and our staff and students including data storage and contemporary online teaching tools. We may provide your personal information to such service providers in connection with the provision of these services. Our service providers may store, or process, data outside Australia, including in the United States, Singapore and Ireland. [APP5 requires names of all countries – to be provided re each service provider]. In addition, our email service provider may store and process emails in the United States or in any other country utilised by Google. [APP5 requires names of countries – to be provided].

8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to us and why, that they can access that information if they wish and that we do not usually disclose the information to third parties.

9. You may obtain further information from the following:
   - For our schools: the school principal
   - For our CELCs: the CELC director
   - For our COSHCs: the COSHC supervisor
   - For our offices:
     Privacy Officer:
     Catholic Education Diocese of Parramatta
     Locked Bag 4
     North Parramatta NSW 1750
     T: 9840 5600.
Appendix 7: Privacy Consent form

Available at: http://www.parra.catholic.edu.au/policy-central

Photos of Students and groups of Students are used for various communications and promotions including CEDP, school, CELC, COSHC and Catholic Education Office websites, publications, newsletters, and enrolment posters. These may be published for educational and marketing purposes.

I [insert name of parent/s]:
☐ Agree
☐ Do not agree
to my child being included in school photographs/video during this year.

If you consent, this consent may be withdrawn at any time by advising:

- For our schools: the school principal
- For our CELCs: the CELC director
- For our COSHCs: the COSHC supervisor
- For our offices:

  Privacy Officer:
  Catholic Education Diocese of Parramatta
  Locked Bag 4
  North Parramatta NSW 1750
  T: 9840 5600.

Withdrawal of consent will not be retrospective.

________________________________________________________________________
[insert Parent name]
[insert date]