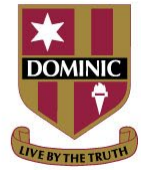


# DOMINIC COLLEGE

*A Catholic School in the Salesian Tradition*



## PRIVACY POLICY

Date	October 2023
Responsible Position	College Leadership Team
Approved By	College Board
Next Review Date	2026
Related Documents	Australian Privacy Principles Complaints Policy The Privacy Act 1988 (Cth) Privacy Compliance Manual 2023

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## 1. OUR PHILOSOPHY

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Dominic College is a Catholic school in the Salesian tradition. The policies of the College, underpinned by the Gospel values, serve to promote the wellbeing, dignity, and uniqueness of each human person.

The four central pillars in the Charter for Salesian Schools encapsulate our founder Don Bosco's vision and guides the College in all aspects of school life. Accordingly, Dominic College is:

- A HOME that welcomes
- A PARISH that evangelises
- A SCHOOL that prepares for life
- A PLAYGROUND where friends meet

Guided by our philosophy, the policy details how we protect your privacy and how Dominic College (the school) complies with the requirements of the Commonwealth Privacy Act 1988 and the Australian Privacy Principles.

## 2. INTRODUCTION

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This Privacy Policy sets out what information we collect, how Dominic College manages personal information and your rights in relation to your personal information, including how to complain and how we deal with complaints.

The school is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 (Privacy Act). Under the Privacy Act, the Australian Privacy Principles do not apply to certain treatment of an employee record. As a result, this Privacy Policy does not apply to the school's treatment of an employee record held by the school, where the treatment is directly related to a current or former employment relationship between the school and the employee.

Dominic College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the school's operations and practices and to make sure it remains appropriate to the changing school environment. The current version of this Privacy Policy is published on our website.

## 3. KINDS OF PERSONAL INFORMATION WE COLLECT

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The types of information the school collects include (but is not limited to) personal information, including health and other sensitive information, about the following groups.

## STUDENTS AND PARENTS AND/OR GUARDIANS

Student and parent/guardian ('parents') details before, during and after the course of a student's enrolment at the school, including but not limited to:

- name, contact details (including next of kin and emergency contacts), date of birth, gender, languages, nationality, country of birth, Aboriginal and Torres Strait Islander status, passport and visa details, citizenship status, previous school, educational and academic records, religion and sacraments received, and parents' education, occupation and financial information;
- health information (e.g. additional needs, details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports, health care plans, and names of doctors);
- credit information including names, addresses, dates of birth and other debtor identification information, the amount of credit that we have provided in respect of the debtor (and the terms on which it was provided), repayment history in relation to the debtor (including any default information) information held by credit reporting bodies including information about your credit history, eligibility for credit and credit capacity (including your current and previous liabilities, information about other credit sought or obtained, information about re-payment of other credit and information about previous defaults, payments and payment arrangements). Credit information also includes information which we obtain through enforcement action such as insolvency and bankruptcy information, information about court proceedings, information from the Australian Financial Security Authority such as information about assets and secured and unsecured debts and other publicly available information about the creditworthiness of the debtor.
- information collected from parents to determine eligibility for financial assistance including income details, assets, employment status, occupation, bank statements, payslips, payment summaries/tax returns, Centrelink income statements, Centrelink Reference Number, and reasons for requiring assistance;
- attendance records;
- results of assignments, tests, and examinations;
- conduct and complaint records, other behaviour and wellbeing records, and school reports;
- information about referrals to government welfare agencies;
- counselling records;
- Court orders and other related agreements and/or Orders;
- Criminal records;
- volunteering information; and
- photos and videos.

## JOB APPLICANTS, VOLUNTEERS, AND CONTRACTORS

Job applicants, volunteers and contractors' details including but not limited to:

- name, contact details (including next of kin and emergency contacts), date of birth, religion, visa and passport details, citizenship status, and Aboriginal or Torres Strait Islander status;
- information contained on job applications (including supporting information);
- professional development history;
- salary and payment information, including bank details and superannuation details;
- health information (e.g. additional needs, details of disability and/or allergies, dietary requirements, immunisation details, medical reports, and health care plans);
- disciplinary and complaint records, and investigation reports;
- insurance details including public liability and professional indemnity;
- leave details;
- photos and videos;
- workplace surveillance information; and
- work emails and private emails (when using work email address) and internet browsing history.

We also collect details from other people who encounter the school, including name and contact details and any other information necessary for the particular contact with the school.

## 4. HOW WE COLLECT PERSONAL INFORMATION

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### PERSONAL INFORMATION YOU PROVIDE

The school generally collects personal information about an individual directly from the individual (or their Parent in the case of students). This includes by way of forms, face-to-face meetings and interviews, emails, and telephone calls.

### PERSONAL INFORMATION PROVIDED BY OTHER PEOPLE

In some circumstances the school may be provided with personal information about an individual from a third party, for example a report provided by a medical professional, a reference from another school or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

### PERSONAL INFORMATION FROM OTHER SOURCES

We may also collect personal information through surveillance activities (such as CCTV security cameras), data tracking, and email monitoring.

## **5. PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION**

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The purposes for which the school collects, uses and discloses personal information depend on our relationship with you and include the following.

### **STUDENTS AND PARENTS**

- Providing schooling and school activities.
- Satisfying the needs of parents, the needs of students and the needs of the school throughout the whole period a student is enrolled at the school.
- Making required reports to government authorities.
- Keeping parents informed about matters related to their child's schooling, through correspondence, apps, newsletters, and magazines.
- Day-to-day administration of the school.
- Looking after students' educational, social and health wellbeing.
- To satisfy the school's legal obligations and allow the school to discharge its duty of care.

### **VOLUNTEERS**

- To contact you about, and administer, the volunteer position.
- For insurance purposes.
- Satisfying the school's legal obligations, for example, in relation to child protection legislation.

### **JOB APPLICANTS AND CONTRACTORS**

- Assessing and (if successful) engaging the applicant or contractor.
- Administering the individual's employment or contract.
- For insurance purposes.
- Satisfying the school's legal obligations, for example, in relation to child protection legislation.

## **6. WHO WE DISCLOSE PERSONAL INFORMATION TO**

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Dominic College may disclose personal information, including sensitive information, for educational, welfare, operational and administrative purposes, and to seek support, advice and funding. This may include to:

- other schools and teachers at those schools, including a school to which a student transfers to or from to facilitate the transfer of the student;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the school, including specialist visiting teachers, sports coaches, volunteers, and counsellors;

- providers of specialist advisory and consultancy services or who provide other assistance to the school, including around Human Resources, child protection, students with additional needs, supporting our business operations, and for the purpose of administering educational applications and ensuring their proper use (see further the section below 'Sending and Storing Information Overseas');
- providers of data management systems, record keeping systems, and learning and assessment tools;
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- agencies and organisations to whom we are required to disclose personal information for education, funding, and research purposes;
- people and organisations providing administrative, financial and other services to the school including those responsible for the collection and recovery of outstanding debts;
- the providers of our information management and storage systems and other information technology services;
- the Salesians of Don Bosco, Catholic Education Tasmania, Tasmanian Catholic Education Commission, and the Archdiocese of Hobart;
- recipients of School publications, such as newsletters and magazines;
- students' parents or guardians;
- anyone you authorise the school to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

## **7. HOW WE STORE PERSONAL INFORMATION**

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We store your personal information in hard copy and electronically. We use information management and storage systems provided by third party service providers. Personal information is stored with and accessible by the third-party service providers for the purpose of providing services to the school in connection with the systems.

The school may use online or 'cloud' service providers to store personal information and to provide services to the school that involve the use of personal information. See further the section below 'Sending and Storing Information Overseas'.

## **8. SENDING AND STORING INFORMATION OVERSEAS**

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The school may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate a school exchange.

The school may use online or 'cloud' service providers to store personal information and to provide services to the school 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 and provide technical support. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers that may be situated outside Australia. The systems in use within Dominic College will reside on Australian sovereign territory as much as reasonably practicable.

## **9. SECURITY OF PERSONAL INFORMATION**

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Dominic College has in place steps to protect the personal information the school 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. These steps include:

- Restricting access to information on the school 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 are aware that they are not to reveal or share personal passwords.
- Ensuring where personal 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 school 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 recourse policies and procedures, such as email and internet usage, confidentiality, and document security policies, designed to ensure that staff 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.

## **10. ACCESS AND CORRECTION OF PERSONAL INFORMATION**

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Under the Commonwealth Privacy Act, an individual has the right to seek access to, and/or correction of, any personal information which Dominic College holds about them. Students will

generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access, update or correct any personal information the school holds about you or your child, please contact the Privacy Officer by email [privacy@domnic.tas.edu.au](mailto:privacy@domnic.tas.edu.au), telephone 03 6274 6000 or post 204 Tolosa Street Glenorchy Tas 7010. The school may require you to verify your identity and specify what information you require. The school may charge a reasonable fee for giving access to your personal information (but will not charge for the making of the request or to correct your personal information). If the information sought is extensive, the school will advise the likely cost in advance.

If we decide to refuse your request, we will provide you with written notice explaining the reasons for refusal (unless, considering the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.

## **11. CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS**

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

Generally, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. Generally, the School 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 school about them or their child by contacting the Privacy Officer by telephone or in writing (details in the section above 'Access and Correction of Personal Information'). However, there may be occasions when access is denied. Such occasions may include (but are not limited to) where the school believes the student has capacity to consent and the school is not permitted to disclose the information to the Parent without the student's consent, 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 school's duty of care to the student.

Dominic College may, at its discretion, on the request of a student grant that student access to information held by the school 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 warrant it.

## 12. ENQUIRIES AND COMPLAINTS

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If you would like further information about the way the school manages the personal information it holds, or wish to complain that you believe that the school has breached the Australian Privacy Principles, please contact the Privacy Officer by email, telephone, or post (details in the section 'Access and Correction of Personal Information') or by using our online complaints form which is available on the College website. The school will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, [www.oaic.gov](http://www.oaic.gov).