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PRIVACY POLICY

Your Privacy is Important

This Privacy Policy applies to schools conducted by the Catholic Education Office of Western Australia (CEOWA).

This statement outlines the CEOWA's policy on how each school uses and manages personal information provided to or collected by it.

The CEOWA is bound by the National Privacy Principles contained in the Commonwealth Privacy Act.

The CEOWA may, from time to time, review and update this Privacy Policy to take into account new laws and technology, changes to schools' operations and practices, and to make sure it remains appropriate to the changing school environment.

What kind of personal information does Lumen Christi College collect and how is it collected? The type of information the College collects and holds includes (but is not limited to) personal information, including sensitive information, about:

Students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the College;

- Job applicants, staff members, volunteers and contractors; and
- Other people who come into contact with the College.

Personal Information you provide: Lumen Christi College will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents and students provide personal information.

Personal Information provided by other people: In some circumstances Lumen Christi 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.

Exception in relation to employee records: Under the Privacy Act the National Privacy Principles do not apply to an employee record. As a result, this privacy Policy does not apply to the College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee.

How will Lumen Christi College use the personal information you provide? Lumen Christi College will use personal information it collects from you 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 you have consented.

Students and Parents: In relation to personal information of students and parents, Lumen Christi 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 purpose for which Lumen Christi College uses personal information of students and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after student's educational, social, spiritual and medical wellbeing;

- seeking donations and marketing for the College;
- to satisfy the CEOWA's and 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 or permit the student to take part in a particular activity.

Job applicants, staff members and contractors: In relation to personal information of 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:

- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for the College; and
- to satisfy the CEOWA's and the College's legal obligations, for example, in relation to child protection legislation.

Volunteers: Lumen Christi College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable the College and the volunteers to work together.

Marketing and fundraising: Lumen Christi 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, for example, the College's Building Fund or alumni organisation (or on occasions, external fundraising organisations).

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, for example newsletters and magazines, which include personal information, may be used for marketing purposes.

Exception in relation to related schools: The Privacy Act allows each school, being legally related to each of the other schools conducted by the CEOWA to share personal (but not sensitive) information with other schools conducted by the CEOWA. Other CEOWA schools may then only use this personal information for the purpose for which it was originally collected by the CEOWA. This allows schools to transfer information between them, for example, when a student transfers from a CEOWA school to another school conducted by the CEOWA.

Who might a school disclose personal information to and store your information with? Lumen Christi College may disclose personal information, including sensitive information, held about an individual to:

- another school;
- government departments;
- your local parish;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers and sports coaches;
- recipients of College publications, such as newsletters and magazines;
- parents;
- anyone you authorise the College to disclose information to; and
- anyone to whom we are required to disclose the information by law.

Sending information overseas: Lumen Christi College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange however, 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 or other applicable privacy legislation.

The College may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.

How does the College treat sensitive information? In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; and health information and biometric 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 you agree otherwise, or the use or disclosure of the sensitive information allowed by law.

Management and security of personal information: The CEOWA and the College's staff members are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information it holds from misuse, interference, 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: The College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the College by contacting the Administration Office at any time.

The National Privacy Principles require that personal information is not stored longer than necessary.

You have the right to check what personal information the College holds about you: Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the CEOWA or the College holds about them and to advise the CEOWA or the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally have access to their personal information through their parents, but older students may seek access themselves.

To make a request to access any information the CEOWA or Lumen Christi College holds about you or your child, please contact the College's Principal in writing.

Lumen Christi 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.

Consent and rights of access to the personal information of students: The CEOWA 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 Lumen Christi College or the CEOWA about them or their child by contacting the College Principal. 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.

Lumen Christi 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 maturity of the student and/or the student's personal circumstances so warranted.

Enquiries and Complaints

If you would like further information about the way the Catholic Education Office of Western Australia or Lumen Christi College manages the personal information it holds, or wish to complain that you believe that CEOWA or Lumen Christi College has breached the Australian Privacy Principles, please contact the College Principal.

LUMEN CHRISTI COLLEGE COLLECTION NOTICE

1. Lumen Christi College collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable Lumen Christi College to provide schooling to the student and to enable him/her to take part in all the activities of the College. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
2. Certain laws governing or relating to the operation of schools require that certain information is collected. These include Public Health, School Education Act 1999 and Child Protection laws, including The Children and Community Services Act 2004.
3. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may ask you to provide medical reports about students from time to time.
4. If the College does not obtain the information referred to above we may not be able to enrol or continue the enrolment of your son/daughter.
5. Lumen Christi College from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes to other schools, government departments, government agencies, statutory boards, the Catholic Education Office, the Catholic Education Commission, your local diocese and the parish and/or schools within other Catholic Dioceses. Information is also disclosed to government authorities such as the School's Curriculum and Standards Authority (SCSA), the Australian Curriculum, Assessment and Reporting Authority (ACARA), medical practitioners, and people providing services to the College, including specialist visiting teachers, [sports] coaches, volunteers and counsellors.
6. In addition to the agencies and purposes cited 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 aggregated school information relating to the circumstances of parents and students on the MySchool website.
7. Lumen Christi College may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. Personal information collected from students is regularly disclosed to their parents or guardians.
9. Parents may seek access to personal information collected about them and their son/daughter by contacting the College. Students may also seek access to personal information about them. 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 the College's duty of care to the student, or where students have provided information in confidence.
10. Lumen Christi College Privacy Policy also sets out how you may complain about a breach of privacy and how the College will deal with such a complaint.
11. As you may know, Lumen Christi College from time to time engages 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 the College's 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. On occasions information such as academic and sporting achievements, student activities and similar news is published, in both hard and digital copy, in the College newsletters and magazines and on our website. Photographs of student activities such as sporting events, College camps and College excursions, etc. may be taken for publication in College newsletters and magazines and on our intranet. Lumen Christi College will obtain separate permissions from the students' parent or guardian prior to publication if we would like to include photographs or other identifying material in promotional material for the College or otherwise make it available to the public such as on the internet.
13. We may include your contact details in a class list and College directory.
14. If you provide Lumen Christi College 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 the College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.