



Carmel School
FAITH & KNOWLEDGE

Privacy policy

Overview

This Policy details how we protect your privacy and how we comply with the requirements of the Privacy Act and the Australian Privacy Principles.

Carmel School (the School) collects personal information, including sensitive information about students and parents/guardians before and during the course of a student's enrolment at the School. The primary purpose of collecting this information is to enable Carmel to provide schooling for your child/children.

Carmel respects your privacy and is committed to safeguarding the personal information we may collect from you.

Who do we collect personal information from?

We collect personal information from students, parents, prospective parents, job applicants, staff, volunteers and others including alumni, contractors, visitors and people who come into contact with the School.

What personal information do we collect?

The kinds of personal information we collect depends on whose information we are collecting and why we are collecting it. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care, as certain laws governing or relating to the operation of schools require that certain information is collected. These include the Education Act, Public Health and Child Protection laws etc. In general terms the School may collect:

- Personal information including names, addresses and other contact details; dates of birth; next of kin details; financial information, photographic images and attendance records.
- Sensitive information (particularly in relation to student and parent 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 records) including medical records, disabilities, immunisation details, individual health care plans, counselling reports, nutrition and dietary requirements. Health information about students is sensitive information within the terms of the National Privacy Principles under the Privacy Act. We may ask you to provide medical reports regarding your children from time to time.

If we do not obtain the information referred to above we may not be able to enrol or continue the enrolment of your child/children.

How do we collect your personal information?

How we collect personal information will depend on whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

Where possible the School has attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form or a Family Data Review and Update

Form). However, we often also receive personal information by email, letters, notes, over the telephone, in face to face meetings, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring.

We may also collect personal information from other people (e.g. a personal reference) 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.

When you provide the School 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 School and why, that they can access that information if they wish and that the School does not usually disclose this information to third parties.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer 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 we use personal information

We only use 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 informed as to school community matters through correspondence, newsletters and magazines;
- marketing, promotional and fundraising activities;
- supporting the activities of school associations such as the Carmel Parents & Friends
- supporting community based causes and activities, charities and other causes in connection with the School’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;
- school administration including for insurance purposes;
- the employment of staff;
- the engagement of volunteers.

We only collect 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 we do 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 School in connection with our activities. These individuals may include students, parents, volunteers, former students and other individuals with whom the School has regular contact in relation to our activities.

We 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.

Storage and security of personal information

We store personal information in a variety of formats including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices.

The security of your personal information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure. 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 sensitive and health information is stored in hard copy files that these files are stored 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.
- maintaining relevant procedures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.
- 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.

When we disclose personal information

We only use 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. The School from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes to other schools,

government departments, medical practitioners, and people providing services to the School, including specialist visiting teachers, sports coaches and contracted service providers and volunteers.

The School from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. We will not disclose your personal information to third parties for their own marketing purposes without your consent

Personal information collected from students is regularly disclosed to their parents or guardians. On occasion, information such as academic and sporting achievements, photographs, student activities and other news is published in newspapers, School newsletters, magazines, on our website and on staff controlled social media. If you do not agree to this and you have not already advised the School via the Image Release Form, you must advise us in writing **now**.

We may include your contact details in a class list and School directory. If you do not agree to this you must advise us in writing **now**.

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.

At Carmel, we take a commonsense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to parents/carers as notices provided to students and we will treat consents provided by parents/carers as consents provided by a student.

We are 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 or 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/carers.

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

How we ensure the quality of your personal information

We take 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.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

How to gain access to your personal information we hold

In accordance with the Privacy Act, an individual has the right to seek to access any personal information Carmel holds about them and to advise Carmel of any perceived inaccuracy with that information. There are some exceptions to this right set out in the Act. Students will generally have access to their personal information through their parents. Requests for access to information should be directed to the School Principal in writing.

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 we 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.

Website use - Cookies

We may use a feature of your browser called a cookie to assign your computer a "User ID". A cookie is a small-text file that is automatically saved on your computer whilst you are visiting a website. These pieces of information are applied to that site to enhance its functionality so that it may be more useful to you. We do not use cookies to store personal information about you or to track your internet usage. Cookies contain information by which Carmel can identify your computer to our servers. In some cases a web page might contain more than one cookie. The information gathered from these different cookies is used to build statistical and demographical information which does not identify you personally to advertisers and other third parties for marketing or promotional purposes. We may use the information gathered by cookies to promote the School at a later stage to people who have visited our site.

We use non-identifying and aggregate information to better design our website. For example, we may see that "X" number of individuals visited a certain area on our website, or that "X" number filled out our registration form, but we would not disclose anything that could be used to identify those individuals. With respect to cookies, we use cookies to record session information, such as items that members download and pages they visit.

You may choose to set your computer to warn you each time a cookie is sent or you may turn off all cookies. This is achieved by changing your browser settings or by using third-party privacy software. However, if you turn cookies off, some of our website's functionality may become unavailable to you.

Privacy complaints

If you wish to make a complaint about a breach by us of the Australian Privacy Principles 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 us

You can contact us about this Policy or about your personal information by:

- Emailing shalom@carmel.wa.edu.au
- Calling 08 9375 4306
- Writing to Lorraine Regan, Director of Communications and Enrolments,, 123 Cresswell Road, Dianella WA 6059

If practical, you can contact us anonymously or by using a pseudonym. If you choose not to identify yourself, we 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.

Changes to our privacy and information handling practices

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our [website](#).