



PRIVACY POLICY

RATIONALE AND SCOPE

This Privacy Policy (Policy) outlines how Loreto Normanhurst (the School) collects, stores, uses, discloses, and disposes of personal information collected about students, parents and/or guardians ('parents'), staff members*, volunteers, contractors, and any other people who come into contact with the School. It also explains how you can exercise your rights in relation to your personal information held by the School.

The School is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 (Privacy Act). The School is also bound by NSW Health Privacy Principles which are contained in the Health Records and Information Privacy Act 2002 (Health Records Act).

The School may, from time to time, review and update this 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 Policy is published on our website.

*Exception in relation to employee records

Under the Privacy Act and Health Records Act, the Australian Privacy Principles and Health Privacy Principles do not apply to certain treatment of an employee record. As a result, this Policy does not apply to the School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and employee.

RELATED LEGISLATION

- Privacy Act 1988 (Cth)
- Health Records and Information Privacy Act (2002)
- Education Act 1990

RELATED POLICIES, GUIDELINES & PROCEDURES

- Loreto Normanhurst Complaints Handling Policy and Procedure
- Loreto Normanhurst Standard Collection Notice
- Loreto Normanhurst Notifiable Data Breach Policy
- Loreto Normanhurst Community Code of Conduct
- Loreto Normanhurst Fundraising Policy
- Loreto Normanhurst Employment Collection Notice

WHAT KINDS OF PERSONAL INFORMATION DOES THE SCHOOL COLLECT?

The type of information the School collects includes (but is not limited to) personal information, including health and other sensitive information, about:

- Students and parents before, during and after the course of a student's enrolment at the School including:
 - Name, contact details (including next of kin), date of birth, gender, language background, previous school, and religion.
 - Parent's education, occupation, and language background.
 - Medical information (e.g., details on disability and/or allergies, absence notes, medical reports, and names of doctors).
 - Conduct and complaint records, or other behaviour notes, and school reports.
 - Information about referral to government welfare agencies.
 - Counselling reports.
 - Health fund details and Medicare number.
 - Any court orders.
 - Volunteering information.
 - Photos and videos of School events.
- Job applicants, staff members, volunteers, and contractors, including:
 - Name, contact details (including next of kin), date of birth, and religion.
 - Information on job application.



- Professional development history.
 - Salary and payment information, including superannuation details.
 - Medical information (e.g., details of disability and/or allergies, and medical certificates).
 - Complaint records and investigation reports.
 - Leave details.
 - Photos and videos at School events.
 - Workplace surveillance information.
 - Work emails and private emails (when using our server) and Internet browsing history.
- Other people who come into contact with the School, including name and contact details and any other information necessary for the particular contact with the School.

HOW DOES THE SCHOOL COLLECT PERSONAL INFORMATION?

Personal information you provide.

The School generally collects personal information held 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.

If you provide the School with personal information about other people, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School, why you are disclosing, and that the individual has the right to request access to their information if they wish.

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 reference provided by a job applicant's referee.

If a student is transferring from another school, we may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

We may also collect personal information through surveillance activities (such as CCTV cameras) and student and staff email monitoring.

PURPOSES FOR WHICH THE SCHOOL COLLECTS, USES AND DISCLOSES PERSONAL INFORMATION

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, including through correspondence, platforms, applications, newsletters, and magazines.
- Day-to-day administration of the School.
- Looking after students' educational, social, and medical wellbeing.
- Seeking donations and marketing for the School (see the 'Marketing and Fundraising' section of this Privacy Policy).
- Satisfying the School's legal obligations and allowing the School to discharge its duty of care.

Volunteers:

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



Job applicants, staff members and contractors:

- Assessing and (if successful) engaging the applicant, staff member or contractor.
- Administering the individual's employment or contract.
- Seeking donations and marketing for the School (see the 'Marketing and Fundraising' section of this Privacy Policy).
- For insurance purposes.
- Satisfying the School's legal obligations, for example, in relation to child protection legislation.

TO WHOM DOES THE SCHOOL DISCLOSE INFORMATION

The School may disclose personal information, including sensitive information, for educational, care and administrative purposes, and to seek support and advice. This may include to:

- Loreto Ministries Limited (LML) (who is the sole member of the School), including for the purpose of LML providing oversight. This includes information about an incident, event, or other issue at or involving the School.
- Other schools and employees at those schools, including a new school to which a student transfers 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, counsellors, volunteers, and sports coaches.
- Organisations that assist us with marketing and fundraising (see the 'Marketing and Fundraising' section of this Policy).
- Other providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection, students with additional needs and for the purpose of administering Microsoft 365 and ensuring its proper use (see further the section below 'Sending and storing information overseas').
- Providers of 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 providing administrative and financial services to the School.
- The provider of our information management and storage systems and other information technology services
- Parent Associations/Committees.
- Media professionals.
- Recipients of School publications, such as newsletters and magazines.
- Students' parents or guardians.
- Anyone you authorise the School to disclose information to.
- Anyone to whom we are required or authorised to disclose the information to by law.

HOW WE STORE PERSONAL INFORMATION

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.

We 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.'

SENDING AND STORING INFORMATION OVERSEAS

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

Loreto Normanhurst 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 server which may be situated outside Australia.

MARKETING AND FUNDRAISING

Loreto Normanhurst treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to provide a quality learning environment in which both students and staff thrive. Your personal information may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities or for the purposes of community engagement.

If you do not want to receive fundraising communications from us, please contact the School's Advancement Team at giving@loretonh.nsw.edu.au or 91-93 Pennant Hills Rd Normanhurst 2076.

School activities and news (including student achievements) are frequently published on the School's website, social media platforms, internal and external newsletters, magazines, and other publications, on our intranet or otherwise shared with the School community (current parents, staff, students, alumnae and the wider Loreto Normanhurst community). This may include personal information (including photographs and videos) of students and parents involved in School activities such as academic and sporting events and achievements, concerts and plays, school camps and school excursions, and community events. The School will obtain permission at Enrolment to include photographs or videos of students in our digital and print promotional material.

SECURITY OF PERSONAL INFORMATION

Loreto Normanhurst has in place steps to protect the personal information the School holds from misuse, interference and loss, and unauthorised access, modification, or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records through to the allocation of varying security levels based on staff security levels.

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.

When the School no longer needs personal information, and is not required to retain it, we take reasonable steps to destroy or de-identify the information.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

Under the Privacy Act and the Health Records Act, an individual has the right to obtain access to, and/or correction of, any personal information which the School 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 Principal in writing at principal@loretonh.nsw.edu.au or 91-93 Pennant Hills Rd Normanhurst 2076. 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, for example to cover the cost of locating, retrieving, reviewing, and copying any material requested (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 written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.



CONSENT AND RIGHTS OF ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

The School 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 Principal (details in the section above 'Access and Correction of Personal Information'). However, there will 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.

The School 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.

ENQUIRIES AND COMPLAINTS

If you would like further information about the way the School manages personal information it holds, or to make a complaint regarding a breach of the Australian Privacy Principles or the Health Privacy Principles, please contact the Principal in writing at principal@loretomh.nsw.edu.au or 91-93 Pennant Hills Rd Normanhurst 2076. Complaints of this nature are taken very seriously, and the School will investigate any complaint and will notify you of the decision relating to your complaint as soon as practicable after it has been made.

If you are not satisfied with our response, you may escalate the matter to the Office of the Australian Information Commissioner (OAIC) via <http://www.oaic.gov.au/>.

This Policy is located on the School website and the Staff Intranet

| Version | Approved By | Version Date | Comment | Procedure Owner | Next Review |
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| 1 | School Board | 2014 | Original | Principal | 2017 |
| 2 | School Board | 2017 | Reviewed and updated | Principal | 2020 |
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