



BLACKFRIARS
PRIORY SCHOOL

PRIVACY POLICY

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CONTEXT

As the only school founded by the Dominican Friars in Australia, Blackfriars Priory School remains faithful to the search for Truth (Veritas) as lived and taught over the last 800 years by the Order of Preachers (Dominicans), and exemplified by Saint Dominic, our Founder, and Saint Albert the Great, our Patron.

Saint Dominic's commitment to study continued throughout his life. The pursuit of knowledge was not for its own sake but to better understand God's creation and its use in the works of the Order has continued through the centuries. Today, Dominicans can be found throughout the world.

An early member of the Dominicans was Saint Albert the Great. He became a lecturer, scientist, philosopher and Bishop. After his death he was recognised as a Doctor of the Church. The Doctor Universalis – The Universal Doctor, in recognition of his extraordinary genius and extensive knowledge, for he studied every branch of learning known at his time. His quest for knowledge saw him study everything he could find as it was through learning about creation, that he was able to know more about the creator, God, and then hand on that information to all he taught.

The lifelong commitment of Saint Dominic and Saint Albert to discovering and applying Truth to hand on to others remains at the core of the Blackfriars teaching pedagogy and its community. Blackfriars is built upon the Four Pillars of Dominican Life: Prayer, Study, Community Life and Service.

PURPOSE

Blackfriars Priory School (Blackfriars) is committed to protecting personal information that it collects. This Privacy Policy outlines how Blackfriars may collect, store, use and disclose information (including personal information) provided to or collected by the School and the rights that an individual has in relation to their information. Blackfriars is bound by the *Privacy Act 1988* (Commonwealth) (**Privacy Act**) and the Australian Privacy Principles (**APP**) which are set out in Schedule 1 of the Privacy Act, and any other applicable State or Territory legislation. All actions taken by Blackfriars are intended to be consistent with the Privacy Act and the APP as set out in this Privacy Policy.

Blackfriars may, from time to time, review and update this Privacy Policy to take into account new laws and technologies, changes to its operations and practices and to ensure the policy remains appropriate to the changing school environment.

SCOPE

This policy applies to all members of the Blackfriars Priory School community.

What kind of personal information does Blackfriars collect and how does it collect it?

“Personal information” is information or an opinion about an individual from which they can be reasonably identified.

One type of personal information is “sensitive information”, which includes information about an individual’s health, genetics, race, political opinion or membership, religion, philosophical beliefs, union membership, sexual preference and criminal record. Sensitive information includes health information.

Information which Blackfriars may collect and hold includes (but is not limited to) contact details, dates of birth, financial information, government identifiers (e.g. Tax File Numbers), citizenship, nationality, country of birth, professional membership, family court orders, criminal records, medical records, disability records, immunization details, psychological reports, employment references, regulatory accreditation, media, directorships, property ownership and Driver’s Licence information.

How will Blackfriars collect personal information?

Personal information provided by an individual: Blackfriars will generally collect personal information held about an individual directly from the individual or by way of forms completed by parents/caregivers, notations from face-to-face meetings, interviews and/or telephone calls and by retained copies of emails, letters and financial transactions.

Personal information provided by other people: In some circumstances, Blackfriars 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. Blackfriars will only collect this information from a third party where it is not reasonable and practical to collect it from the individual directly.

Blackfriars will also collect personal information from a third party when the individual has authorized another person or source to provide the information.

Information collected from our website and social media: Information based on how individuals use the Blackfriars’ website and social media platforms may be recorded. “Cookies” and other data collection methods may be used to collect information on website and social media activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to the website/social media platforms. This information is collected to analyse and improve the School’s website and social media presence, marketing campaigns and to record statistics on website/social media traffic and is not used to personally identify individuals.

Unsolicited information: Blackfriars may be provided with personal information without having sought it through normal means of collection, such as misdirected postal or electronic mail, or employment applications received that are not in response to an advertised vacancy. When Blackfriars receives such information, it will decide within a reasonable period whether the information could have been collected pursuant to the requirements in the APP. If it is determined that the information should not have been collected it will be destroyed or de-identified as soon as practicable. Alternatively, if it is determined that the information could have been legally collected and wish to retain it, the acquired information will be treated in accordance and compliance of the Australian Privacy Principles.

How will Blackfriars use the personal information an individual provides?

Blackfriars will use personal information it collects from an individual 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 an individual has consented.

Students and Parents: For personal information about students and parents/caregivers, the primary purpose of collection is to enable the School to provide education to the student. This includes satisfying both the needs of parents/caregivers and the needs of the student throughout the duration of time that the student is enrolled at Blackfriars.

The purposes for which Blackfriars uses personal information of students and parents/caregivers include:

- To keep parents/caregivers informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- Day-to-day administration
- To look after the educational, social, spiritual and medical well-being of students
- To seek donations and marketing for the School
- To contribute to aggregated data that the Catholic Education South Australia (CESA) or the South Australian Commission for Catholic Schools Inc. (SACCS) may require from time to time to meet their reporting, planning, contract and funding responsibilities on behalf of schools
- To satisfy legal obligations and allow Blackfriars to discharge its duty of care.

In some cases where Blackfriars requests personal information about a student or parent/caregiver, if the information requested is not obtained, the School may not be able to enroll or continue the enrolment of the student.

Job applicants, staff members and contractors: For personal information about job applicants, staff members and contractors, Blackfriars' 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 Blackfriars uses personal information of job applicants, staff members and contractors include:

- To administer the individual's employment or contract (as the case may be)
- For insurance purposes
- To seek funds and marketing for the School
- To contribute to aggregated data that SACCS and CESA use to meet their reporting, planning, contract and funding responsibilities
- To enable SACCS, CESA and Blackfriars to maintain necessary staff information for entitlements including long service leave, maternity leave, ReturnToWork SA and other necessary industrial or employment purposes, and for accreditation and funding purposes
- To satisfy legal obligations (for example, in relation to child protection legislation).

Volunteers: Blackfriars may obtain personal information about volunteers who assist the School in its functions or conduct associated activities, such as Parents and Friends and Old Scholars Associations, to enable the School and the volunteers to work together and in relation to child protection legislation.

Marketing and Fundraising: Blackfriars treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that Blackfriars continues to be a quality learning environment in which both students and staff thrive. Personal information held by Blackfriars may be disclosed

to an organization that assists in the School's fundraising for example, the School's Parents and Friends Association.

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

Sensitive Information: Blackfriars will only collect and use sensitive information if it is:

- Reasonably necessary for one or more of the School's functions or activities, and if the individual's consent has been obtained
- Necessary to lessen or prevent a serious threat to life, health or safety
- In a permitted general situation
- In a permitted health situation.

Sending information overseas: Neither CESA, the Principal or delegate of the Principal will disclose information about an individual to overseas recipients unless absolute necessary for example, to facilitate a student exchange program. The School will not send personal information about an individual outside Australia without obtaining the consent of the individual.

Management and security of personal information

CESA, the Principal or delegate of the Principal are required to respect the confidentiality of personal information and the privacy of individuals, including but not limited to students, parents/caregivers, employees and volunteers. Blackfriars will hold personal information and sensitive information in electronic databases, hardcopy files and personal devices including laptop computers, third party storage providers such as cloud storage facilities or in paper-based files.

Blackfriars has in place steps to protect the personal information held from misuse, loss, unauthorized access, modification or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerized records.

Individuals have the right to check what personal information Blackfriars holds about them

Under the Privacy Act, individuals may seek access to any personal information that Blackfriars holds about them and request that Blackfriars make corrections to that information. However, Blackfriars may refuse to allow an individual access to information in certain circumstances if required or permitted by law.

For individuals to make a request to access any information that Blackfriars holds about them, they should contact the Principal in writing.

The Principal may require individuals to verify their identity and specify what information they require. A fee may be charged to cover the cost of verifying the individual's application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the individual will be advised of the likely cost in advance.

Consent and rights of access to the personal information of students

Blackfriars respects the rights of parents/caregivers to make decisions concerning their child's education. Generally, Blackfriars will refer any requests for consent and notices in relation to the personal information of a student to the parents/caregivers of the student. Blackfriars will treat consent given by parents/caregivers as consent given on behalf of the student, and notice to parents/caregivers will act as notice given to the student.

Blackfriars may, at its discretion, on the request of a student grant that student access to information held by the School about him, or allow a student to give or withhold consent to the use of his personal information, independently of their parents/caregivers. This would normally only apply when the student involved had reached 18 years of age, but Blackfriars could do so in other circumstances when the maturity of the student and/or the student's personal circumstances so warranted.

Consent for photographs and publication of student work

From time to time, photographs or videotapes of students and their learning are taken at the School or at locations where the children are involved in an excursion or activity. These photos/images/videos may be used in class activities or could be published by the School and/or Catholic Education South Australia in documents, school magazines, newsletters, displays, journals, professional development materials for teachers, or on the School's or Catholic Education's website. In addition, student work is also published from time to time.

The School and/or Catholic Education South Australia may also like to make publications containing the photos/images/student work available free of charge to government and/or non-government schools and education institutions and sectors around Australia for their educational purposes under the National Education Access Licence for Schools (NEALS). NEALS is a licence between government and non-government education institutions and sectors of the various states and territories, which allows schools to share material for educational use.

Consent will be obtained before including children in school publications or displays. In most circumstances the images will not include any personal information regarding the student's identity or may include the student's first name only. However, in the School magazine and in the School newsletter, because of the limited circulation of these documents, it is usual for the student's full name to appear under photographs or to record student achievement in various activities or beneath examples of student work.

Responding to data breaches

Blackfriars will take appropriate and prompt action if there are reasonable grounds to believe that a data breach may have, or is suspected, to have occurred. Depending on the type of data breach, this may include a review of internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If Blackfriars is unable to notify individuals, a statement will be published on the Blackfriars' website and reasonable steps will be taken to publicise the contents of the statement.

Complaints

An individual can make a complaint about how Blackfriars manages personal information by notifying the School in writing. Blackfriars will respond to the complaint within a reasonable time and will seek further information in order to provide a full and complete response.

If the individual is not satisfied with the School's response, they may refer the complaint to OAIC. A complaint to OAIC can be made using the OAIC online [Privacy Complaint form](#) or by mail, fax or email. A complaint to OAIC should be a last resort once all other avenues of resolution have been exhausted.

Blackfriars can be contacted about this Privacy Policy or about personal information generally, at:

The Principal
Blackfriars Priory School
PO Box 86
PROSPECT SA 5082

DEFINITIONS

Health Information:

Information or an opinion, that is also personal information, about the health or a disability (at any time) of an individual, an individual's expressed wishes about the future provision of health services to him or her, or a health service provided or to be provided to an individual. It also means:

- other personal information collected to provide, or in providing, a health service, or
- other personal information about an individual collected in connection with the donation, or intended donation, by the individual of their body parts, organs or body substances, or
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

Permitted general situation:

The information handling requirements imposed by some Australian Privacy Principles do not apply if a 'permitted general situation' exists. Section 16A sets out the following permitted general situations relevant to Blackfriars:

- lessening or preventing a serious threat to the life, health or safety of any individual, or to public health or safety
- taking appropriate action in relation to suspected unlawful activity or serious misconduct
- locating a person reported as missing
- asserting a legal or equitable claim
- conducting an alternative dispute resolution process.

Permitted health situation:

The information handling requirements imposed by APP3 and APP6 do not apply to an organisation if a 'permitted health situation' exists. Section 16B sets out the following permitted health situations relevant to Blackfriars:

- the collection of health information to provide a health service
- the collection of health information for certain research and other purposes
- the use or disclosure of health information for certain research and other purposes
- the use or disclosure of genetic information
- the disclosure of health information for a secondary purpose to a responsible person for an individual.

Personal Information:

Any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Sensitive Information:

Information or an opinion (that is also personal information) about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It includes health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification, and biometric templates.

RELATED DOCUMENTS/LINKS

1. Privacy Act 1988: [Federal Register of Legislation](#)
2. Office of the Australian Information Commissioner – www.oaic.gov.au – [Privacy Complaint form](#)
3. South Australian Commission for Catholic Schools (SACCS) Privacy Policy 2018: cesa.catholic.edu.au/docushare/dsweb/View/Collection-360
4. Blackfriars Priory School, Data Breach Response Plan and Procedures: blackfriars.sa.edu.au/policies

POLICY IMPLEMENTATION

Responsibility for implementation, monitoring and review of the policy is vested at the level of the following levels:

Principal

POLICY REVIEW

Frequency: Every 2 years

Next review date: August 2022

APPROVAL AUTHORITY / POLICY OWNER

Blackfriars Priory School