

Title	Privacy Policy
Description of policy	Sets out obligations and processes to protect personal and confidential information CECG workers obtain and use in the course of work.
Required because	CECG and all its workers are legally required to protect personal information they obtain or use in the course of their work.
Description of changes	Minor changes to section 10 to add details about measures for keeping personal information secure. New paragraph 5.5 to note that CECG collects personal information for the purposes of the Nationally Consistent Collection of Data
Applies to	<input checked="" type="checkbox"/> Organisation-wide <input type="checkbox"/> Specific (location, schools/ELCs&SACs, Service Area) <input type="checkbox"/> Staff only <input type="checkbox"/> Students only <input checked="" type="checkbox"/> Staff and students
Status	<input type="checkbox"/> New <input type="checkbox"/> Major revision of existing document <input checked="" type="checkbox"/> Minor revision of existing document

Publication location	Intranet and Public Website
Related documents	Complaints Policy
Intranet category	Governance and Legal
Review date	May 2026
Trim reference number	R441300

Approval authority for this version:	People and Culture Service Area Leader
Approval date:	13 May 2024
Accountable authority	People and Culture Service Area Leader
Responsible officer	Senior Officer Legal Research and Policy

1. Summary	3
2. Document Title.....	Error! Bookmark not defined.
3. Sub-heading	Error! Bookmark not defined.
4. Sub-heading	Error! Bookmark not defined.
Sub-topic	Error! Bookmark not defined.
5. Definitions.....	8
6. Related Documents and Legislation.....	9
7. Contact.....	9
8. Appendix 1 – Title	Error! Bookmark not defined.

1. Summary

- 1.1 This Privacy Policy details how Catholic Education Archdiocese of Canberra and Goulburn (CECG) and its workers protect personal information obtained or used in the course of their work. It outlines requirements and procedures to comply with the Privacy Act 1988, other relevant legislation, and the 13 Australian Privacy Principles. It confirms CECG's commitment to the privacy rights of CECG school communities and workers.
- 1.2 This policy describes:
 - who CECG collects information from
 - the types of personal information collected and held by CECG
 - how this information is collected and held
 - the purposes for which personal information is collected and used
 - how CECG store personal information
 - disclosure of personal information, including to overseas recipients
 - how you can gain access to personal information and seek its correction
 - how you may complain or inquire about our collection, handling, use or disclosure of personal information and how that complaint or inquiry.

2. Privacy Policy

- 2.1 This policy applies to all CECG workers, in all CECG workplaces.
- 2.2 CECG workers must ensure personal information is not used or disclosed except as allowed under this policy and the Australian Privacy Principles.
- 2.3 CECG workers must not disclosure confidential information obtained in the course of their work except to the extent it is legally required in the course of their duties. Workers in some positions may be required to sign confidentiality agreements.
- 2.4 Confidentiality or privacy breaches can have serious consequences for individuals, families, and CECG. All privacy and confidentiality breaches must be investigated in line with this policy. Privacy and confidentiality breaches may result in disciplinary proceedings.

3. Why Does CECG Collect Personal Information?

- 3.1 CECG may collect personal information if it is necessary for and directly related to the organisation's usual work (primary purposes), including:
 - providing education, pastoral care, extra-curricular activities, and health services
 - managing and operating CECG workplaces including schools, Early Learning Centres, School Age Care and offices
 - keeping parents informed about school community matters
 - marketing, promotional and fundraising activities
 - supporting the activities of school
 - satisfying legal obligations
 - employing staff
 - engaging volunteers.

4. Who Does CECG Collect Information From?

- 4.1 In the course of normal work, CECG collects information from a wide range of people including students, parents, job applicants, staff, volunteers and others including contractors and visitors and others that come into contact with CECG.
- 4.2 Regardless of who the information relates to, CECG protects all personal information in line with the Australian Privacy Principles.

5. What Types of Information Does CECG Collect?

- 5.1 In the usual course of work CECG may collect Personal Information that is protected by the Australian Privacy Principles.
- 5.2 **Personal Information** is any information or an opinion about an identified individual, or an individual who is reasonably identifiable.

For example, a name or photograph identifies a person so any information accompanied by a name or photo may be personal information under privacy principles. But a person might also be identifiable from information even if it is not accompanied by a name, such as address or contact details, financial information, medical records, or employment details.

- 5.3 Additional protections may apply to specific types of personal information, including:
 - sensitive Information, which is personal information about racial or ethnic origin; political, religious, or philosophical beliefs and opinions; political or professional memberships; sexual orientation; criminal record; or health, genetic and biometric information
 - health Information, which is any personal information about health including nutrition or dietary requirements, illness, disability, injury, health services, genetics, or organ donation
 - credit information or tax file number.
- 5.4 Sensitive information must not be collected unless:
 - the person the information is about provides informed consent
 - collection is authorised by law or for permitted health reasons
 - the information relates to CECG activities and relates solely to people who have regular contact with CECG in the course of its activities (e.g. students, parents, employees).
 - Information or opinion does not need to be true or recorded in material form to be protected by Privacy Principles.

6. How Does CECG Collect Personal Information?

- 6.1 CECG may collect personal information in many ways including email, websites, letters, notes, over the telephone, in face to face meetings, financial transactions or surveillance activities such as the use of CCTV security cameras.
- 6.2 CECG may also collect personal information from other people (e.g. a personal reference) or independent sources. CECG will only do so where it is not reasonable and practical to collect the information from a person directly.
- 6.3 Sometimes CECG may receive unsolicited information. If CECG receives unsolicited information it could not collect by normal means, then CECG will destroy or permanently

delete the information. If information is retained, CECG will not use or disclose the information unless Privacy Principles permit that when the information is collected by normal means.

7. How Does CECG Use or Disclose Personal Information?

- 7.1 CECG may use or disclose personal information for the reason it is collected -the primary purpose (see section 3). CECG may not use or disclose information for other purposes (secondary purposes) unless they are permitted by the Privacy Principles, including:
- the person the information is about provides informed consent
 - the secondary purpose is related to the primary purpose and the person the information is about would reasonably expect that
 - the secondary purpose is authorised under an Australian law or for law enforcement reasons
 - CECG reasonably believes the use or disclosure is necessary to lesson a serious threat to life, health or safety.
- 7.2 In some cases where a school or the CEO requests personal information about a student or parent, if the information requested is not provided, CECG may not be able to enrol or continue the enrolment of the student, or permit the student to take part in a particular activity.
- 7.3 CECG does not use information for direct marketing purposes.
- 7.4 CECG does not use government-related identifiers unless required.
- 7.5 Additional exemptions apply to employee records collected or used within the scope of the employment relationship. For example, privacy principals to not apply to employee records shared within CECG or external organisations where that is required for work purposes.
- 7.6 CECG is required to collect Personal Information from Schools to meet obligations under various regulations. The regulations require that CECG share information with government authorities and regulators, for example with courts under court order or with the Commonwealth Department of Education and Training regarding students with a disability.

8. Sharing of Information Between Related System Schools

- 8.1 The Privacy Act allows a system school, being legally related to each of the other schools conducted by the CEO, to share personal (but not sensitive) information with other schools in the CEO System. This allows schools to transfer information between schools as long as the information is being used for the original purpose. For example, information collected for enrolments can be shared with another CECG school if the student enrolls in the other school.

9. Disclosing Personal Information to Overseas Recipients

- 9.1 CECG may disclose personal information to overseas recipients in certain circumstances, such as when CECG is organising an overseas excursion. The usual limitations on disclosing information apply even if the recipient is overseas.

9.2 If disclosure is permitted, CECG workers must take care to ensure the recipient will not breach Australian privacy principles unless:

- CECG is satisfied the overseas recipient complies with the Australian Privacy Principles or a similar privacy regime
- the disclosure is authorised by Australian law
- CECG forms the opinion the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety.
- CECG is taking appropriate action in relation to suspected unlawful activity or serious misconduct
- CECG informs the person the information is about that CECG cannot ensure the recipient will comply with privacy principles and the person consents to the information being shared.

10. Storage and Security of Personal Information

10.1 CECG stores personal information in various formats including databases, hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices. The security of personal information is important and CECG takes all reasonable steps to protect the personal information CECG hold about you from misuse, loss, unauthorised access, modification or disclosure.

10.2 Appropriate security for Personal Information may include :

- locked storage of paper records
- Limiting access to records to staff with a need to know
- Encryption and passcode protected access to digital records.

10.3 Employees must comply with relevant policies when storing records with Personal information, including this Privacy Policy, the [Confidentiality Policy](#), and the [Cybersecurity Policy](#).

11. How to Gain Access to Personal Information CECG Holds

11.1 Parents/carers may request personal information about their children that attend CECG schools, ELCs or SACs, in the absence of court orders to the contrary or conflicting privacy rights.

11.2 Students may request access to their personal information that CECG holds or request that their personal information is not shared with other parties. Requests by students under 18 years of age will be assessed consistent with the student's age, maturity, and level of understanding.

11.3 Requests for personal information about students should be directed to the school principal or ELC director in the first instance, depending on whether the request relates to school or ELC information.

11.4 Requests to the Catholic Education Office should be directed to legal@cg.catholic.edu.au. Further information is outlined at [Service of subpoenas, summons, notices and orders – Catholic Education](#).

11.5 Access to personal information may be denied consistent with the Australian Privacy Principles, including where the 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.

- 11.6 We may charge fees to produce documents, to cover the cost of complying with the request. Those costs include, but are not limited to, staff time in locating and searching records, the resources involved in copying documents and delivery of documents to the appropriate Court, Tribunal or other recipient.

12. How CECG Ensures the Quality of Personal Information

- 12.1 CECG takes all reasonable steps to ensure the personal information CECG 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 when collected and when using or disclosing the personal information.
- 12.2 CECG updates personal information when CECG are advised by individuals or when CECG becomes aware through other means that their personal information has changed.

13. Correcting Personal Information

- 13.1 To update any personal information that CECG holds, individuals should contact the school Principal, ELC Director, or Catholic Education Office, whichever is most appropriate.

14. Privacy Complaints

- 14.1 Complaints about privacy or a possible breach of Privacy Principles are dealt with under the CECG [Complaints Policy](#).
- 14.2 CECG recommends complaints are raised at the school or ELC in the first instance, if appropriate. Complaints about privacy may also be directed legal@cg.catholic.edu.au or to the Office of the Australian Information Commissioner.

15. Data Breaches and Privacy Breaches

What is a Notifiable Data Breach?

- 15.1 The Privacy Act refers to an “eligible data breach”, while the Office of the Australian Information Commissioner uses the term Notifiable Data Breach on its website.
- 15.2 A data breach occurs when personal information CECG holds is lost or subject to unauthorised access or disclosure.
- 15.3 If a data breach occurs, employees must comply with the CECG Data Breach Response Plan. The process includes:
- **Identify and Notify:** Notify your Supervisor/Principal if you think there may have been unauthorised access to, or unauthorised disclosure of, personal information
 - **Contain:** CECG legal team and ICT team will support employees to limit access to information.
 - **Assess:** Conduct risk assessment to identify whether serious harm is likely and what response steps are required.
 - **Respond:** Respond according to the risk level of the potential data breach
 - **Report:** If a notifiable data breach has occurred, the CECG legal team will report to the Office of the Australian Information Commissioner.

- **Review and remediate:** Review the cause of any breach and implement necessary steps to reduce or eliminate the risk of future breaches.
- 15.4 The Office of the Australian Information Commissioner must be notified of a data breach where:
- there is unauthorised access to, or unauthorised disclosure of, personal information
 - a reasonable person would conclude that the access or disclosure would be likely to result in serious harm to any of the individuals to whom the personal information relates.
OR
 - personal information is lost in circumstances where:
 - unauthorised access to, or unauthorised disclosure of, the information is likely to occur
 - assuming that unauthorised access to, or unauthorised disclosure of, the information were to occur, a reasonable person would conclude that the access or disclosure would be likely to result in serious harm to any of the individuals to whom the information relates.
- 15.5 Further information on identifying an eligible data breach can be found on the Office of the Australia Information Commissioner website.

16. Definitions

- 16.1 **Confidential information:** any information that by its nature is intended to be kept private and/or confidential, whether or not it is labelled confidential. Confidential information may include but is not limited to personal information, internal information about CECG operations, or financial information.
- 16.2 **Health information:** is any information or opinion about a person's health or disability of an individual, their expressed wishes about the provision of health services and a health service provided, currently or in the future, to an individual that is also personal information. Health information also includes personal information collected in the course of providing a health service.
- 16.3 Information can be personal information whether it is true or not and whether it is recorded in a material form or not.
- 16.4 **Record:** the Privacy Act regulates personal information contained in a 'record'. A 'record' includes a 'document', whether in paper form or held in an electronic or other device. The definition in the Amending Act is Privacy inclusive and therefore now covers a wide variety of material which might constitute a record. A 'document' is defined to include anything on which there is writing, anything from which sounds, images or writings can be reproduced, drawings or photographs.
- 16.5 **Sensitive information:** information or an opinion 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
- criminal record that is also personal information
- health information about an individual (including information about a disability or an Individual Learning Plan)
- genetic information about an individual that is not otherwise health information
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification
- biometric templates.

16.6 **Serious Harm:** includes serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation and other forms of serious harm that a reasonable person in the school's position would identify as a possible outcome of the data breach.

17. Related Documents and Legislation

17.1 Related CECG Documents:

- [Complaints Policy](#)
- [Privacy Statement – Catholic Education](#)

17.2 Related legislation or Standards

- [Privacy Act 1988 \(Commonwealth\)](#)
- [Health Records and Information Privacy Act 2002](#)
- [Health Records \(Privacy and Access\) Act 1997](#)

18. Contact

18.1 For support or further questions relating to this policy, contact the CECG Legal, Governance, Policy and Risk team.