



Catholic
Education
Commission
Tasmania

PRIVACY POLICY

TABLE OF CONTENTS

1	AUTHORITY AND APPLICATION	3
2	RELATED DOCUMENTS	4
3	RATIONALE	4
4	DEFINITIONS	4
5	GENERAL INFORMATION	5
6	WHAT KIND OF PERSONAL INFORMATION DOES A SCHOOL COLLECT AND HOW DOES A SCHOOL COLLECT IT?	5
7	HOW WILL A SCHOOL USE THE PERSONAL INFORMATION YOU PROVIDE?	7
8	WHO MIGHT A SCHOOL DISCLOSE PERSONAL INFORMATION TO?	8
9	REFERENCES	11
10	APPENDICES	11

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 2 of 15

1 AUTHORITY AND APPLICATION

Date of approval	29 August 2019
Source of approval	Catholic Education Commission Tasmania
Start date	12 September 2019
Date of review	August 2022
Date of amendments	20 August 2019
Previous policies replaced by this Policy	Privacy Policy 6 September 2018

SIGNED:



Chair of the CECT

DATE:

10 September 2019

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 3 of 15

2 RELATED DOCUMENTS

This Policy should be considered in conjunction with the following related documents:

Policies and Procedures	<ul style="list-style-type: none">• Appendix 1 Standard Collection Notice• Appendix 2 Credit Information Privacy Policy• NCEC & NCISA Privacy Compliance Manual• TCEO Computer Usage Policy• Archdiocese of Hobart Privacy Policy
Applicable Laws	All laws in connection with the carrying out of work or the Workplace including: <ul style="list-style-type: none">• <i>The Privacy Act 1988</i>• <i>Australian Privacy Principles (APP)</i>

3 RATIONALE

Your privacy is important. This Privacy Policy applies to all Catholic schools operated by the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart (**Archdiocese of Hobart**), the Tasmanian Catholic Education Office (**TCEO**) and the Catholic Education Commission Tasmania (**CECT**) and sets out how the TCEO, CECT and each school manages personal information provided to or collected by it. For the purpose of this policy, if not explicitly stated, the term 'school' includes the TCEO and CECT.

The CECT, TCEO and each Catholic school conducted in the Archdiocese of Hobart are bound by the *Australian Privacy Principles (APP)* contained in the Commonwealth *Privacy Act 1988* (Cth) (**Privacy Act**).

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

4 DEFINITIONS

For the purposes of this policy:

- Archdiocese of Hobart means The Roman Catholic Church Trust Corporation of the Archdiocese of Hobart.
- CECT means the Catholic Education Commission Tasmania.
- CET means Catholic Education Tasmania covers the Tasmanian Catholic Education Commission, Tasmanian Catholic Education Office, Archdiocesan Schools and Congregation Schools.
- TCEO means the Tasmanian Catholic Education Office.

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 4 of 15

5 GENERAL INFORMATION

What is Personal Information?

'Personal information' is defined by the *Privacy Act* as information or an opinion, whether true or not, about an individual whose identity is apparent or can reasonably be ascertained from the information.

Personal information may include 'sensitive information' about an individual.

What is Sensitive Information?

'Sensitive information' is personal information relating to a person's racial or ethnic origin, political opinions, membership of political associations, religious beliefs or affiliations, philosophical beliefs, trade union or other professional or trade association membership, sexual orientation or practices or criminal record information. It also includes health, genetic or biometric information.

'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 is allowed by law.

What is a Standard Collection Notice?

A standard collection notice or 'personal information collection notice' is a notice that describes what personal information is collected about students and their families, how that information is used and to whom it may be disclosed. These types of notices are provided on enrolment and at other times of collection of personal information. They can also be found on the school website, the CET website www.catholic.tas.edu.au, or can be obtained in hard copy from the school or Tasmanian Catholic Education Office.

6 WHAT KIND OF PERSONAL INFORMATION DOES A SCHOOL COLLECT AND HOW DOES A SCHOOL COLLECT IT?

The Archdiocese of Hobart both independently and through its schools, the CECT and TCEO collect and hold 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 school;
- job applicants, staff members, volunteers and contractors; and
- other individuals who come into contact with the school.

Personal Information you provide: A school 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. Individuals may also provide personal information any time they come into contact with the school.

Personal Information provided by other people: In some circumstances a third party may provide a school with personal information about an individual, for example a report provided by a medical professional or a reference from another school. Sometimes a school

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 5 of 15

will create personal information about a student or other individuals, for example when a teacher writes a report about the student or a file note is recorded.

A school where possible, will collect personal information about a student, Parent or other individuals directly from those individuals. However, some circumstances where consent is not required include where collection, use or disclosure of personal information is necessary to lessen or prevent a serious threat to life, health or safety and it is impractical to get consent or where the school is otherwise required or authorised to do so by law.

Exception in relation to employee records: Under the *Privacy Act* the *Australian Privacy Principles* do not apply to an employee record. As a result, this Privacy 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.

Personal information collected about students and Parents before, during and after a student's enrolment in a school may include (but is not limited to):

- educational and academic records;
- addresses;
- dates of birth;
- phone numbers;
- health information, including medical reports;
- sports information;
- Medicare card numbers;
- If applicable Healthcare card numbers (or information that you have a healthcare card); copies of income tax return and notice of assessment; pay slips; centrelink statements; bank statements and other financial records.

Certain laws governing or relating to the operation of schools require that certain information is collected. These include but are not limited to the *Australian Curriculum, Assessment and Reporting Authority Act 2008* (Cth); the *Australian Education Act 2013* (Cth); the *Office of Tasmanian Assessment, Standards and Certification Act 2003* (Tas); the *Public Health Act 1997* (Tas); and child protection laws.

National data is collected annually from the Commonwealth Department of Education and Training, to identify the number of school students with disability and the level of reasonable adjustment provided to them. Every year, the school will collect the following information from each student receiving an adjustment due to disability:

- the student's level of education (i.e. primary or secondary);
- the student's level of adjustment; and
- the student's broad type of disability

The information provided to the Department of Education and Training for the purpose of the 'Nationally Consistent Collection of Data' will not identify individual students.

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 6 of 15

7 HOW WILL A SCHOOL USE THE PERSONAL INFORMATION YOU PROVIDE?

A school will use personal information it collects from you for the primary purpose for which the information was collected. The information may be used for such other secondary purposes that are related to the primary purpose of collection and which are reasonably expected by you, or to which you have consented.

Students and Parents: In relation to personal information of students and Parents, a school's primary purpose of collection is to enable the school to provide schooling for the student. This includes satisfying the needs of Parents, the needs of the student and the needs of the school throughout the whole period the student is enrolled in a Catholic school operated by the Archdiocese of Hobart.

The other purposes for which a school 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 school
- to satisfy the school's legal obligations and allow the school to discharge its duty of care.

The purpose of collecting medicare card number information is to provide doctors and health professionals that information in circumstances where Parents are not contactable (to expedite emergency treatment and to cover associated bulk billing costs).

The purpose of collecting healthcare card number information (or information that you have a healthcare card), copies of income tax returns and notice of assessment; pay slips; centrelink statements; or bank statements is to determine eligibility to apply any remission to fees.

In some cases where a school requests personal information about a student or Parent, if the information requested is not obtained, the school 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, a school'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 a school uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or the contract, as the case may be
- for insurance purposes
- seeking funds and marketing for the school
- to satisfy the requirements for Catholic Education in Tasmania and fulfill the school's legal obligations, for example, in relation to child protection legislation, work health and safety legislation or to check registration records such as working with vulnerable people registration.

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 7 of 15

Volunteers: A school also obtains personal information about volunteers who assist the school in its functions or conduct associated activities, such as alumni associations, to enable the school and the volunteers to work together and to check registration records such as working with vulnerable people registration.

Marketing and fundraising: Schools treat marketing and seeking donations for the future growth and development of the school as an important part of ensuring that the school continues to be a quality learning environment in which both students and staff thrive. Personal information held by a school may be disclosed to an organisation that assists in the school's fundraising, for example, the school's Foundation or alumni organisation.

Parents, staff, contractors and other members of the wider school 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.

Individuals who wish to opt out of receiving marketing or fundraising material may contact the relevant school's office.

8 WHO MIGHT A SCHOOL DISCLOSE PERSONAL INFORMATION TO?

A school may disclose personal information, including sensitive information, held about an individual to:

- another school
- government departments (such as the Department of Education and Training)
- government agencies (such as the Australian Curriculum, Assessment and Reporting Authority – **ACARA**)
- statutory boards (e.g. the Teachers Registration Board of Tasmania)
- medical practitioners
- people providing services to the school including specialist visiting teachers, counsellors, music teachers, coaches, auditors, lawyers, insurers, accountants or debt collectors
- recipients of school publications, like newsletters and magazines
- Parents
- parishes
- anyone you authorise the school to disclose information to; and
- anyone to whom the school is required to disclose the information to by law.

When a student moves between schools both operated by the Archdiocese of Hobart, Dominic College (operated by the Salesians of Don Bosco), St Virgil's College and/or St Francis Flexible Learning Centre (operated by Edmund Rice Education Australia) the schools may exchange any and all personal information about the student. When a student moves from a school operated by the Archdiocese (**original school**) to a school not operated by the Archdiocese of Hobart (**new school**), the original school may provide personal information about the Student to the new school with the consent of the student (or their Parent(s) on their behalf).

Certain 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

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 8 of 15

some school information relating to the circumstances of Parents and students on the MySchool website.

Personal information collected from one Parent may be disclosed to others responsible for payment of fees for that Parent's child, including information about payments made or overdue.

A Parent's business contact details may be included (upon request and consent) in a school business directory.

Photographs of student activities such as sporting events, school camps and school excursions may be taken for and published in school newsletters and magazines and on the School's intranet. The school will obtain separate permissions from the student's Parents if the school wishes to include photographs or other identifying material in promotional material for the school or otherwise make it available to the public such as on the Internet.

If Parents provide permission in relation to publications of photographs of their child, or if the student provides that consent, it is possible that the photograph/video may appear in material which will be available to schools and education departments around Australia under the National Educational Access Licence for schools (**NEALS**). This is a licence between education departments of the various states and territories, allowing schools to use licensed material wholly and freely for educational purposes only. This licence only applies to educational material that is publicly available. Further information regarding what material is available for use can be found on the CET website.

Sending and storing information overseas: A school may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, a school will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (including from a Parent on behalf of a student); or
- otherwise complying with the *Australian Privacy Principles* or other applicable privacy legislation.

The school may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia. However, in this case the information will remain in the effective control of the school and the school will take reasonable steps to ensure the overseas host complies with the *Australian Privacy Principles*.

Can an individual be anonymous or use a pseudonym?

Due to the nature of delivery of schooling, it would be impracticable for the school to provide appropriate services to or by individuals who have not identified themselves or choose to remain anonymous or use a pseudonym. For example, it would make it difficult to monitor progress of individual students.

Management and security of personal information

The school staff are required to respect the privacy of all individuals' personal information.

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 9 of 15

Each school has in place steps to protect the personal information held from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password-protected access to computerised records.

Please be aware that sending information by the internet or email cannot be guaranteed to be 100 per cent secure. If you are concerned about the security of email or the internet, you should arrange alternative delivery of information, for example, by registered post or encrypted email.

Updating personal information

A person may seek to update their personal information held by a school by contacting the school office at any time using the contact details at the end of this privacy policy, if they believe their personal information is inaccurate, misleading or out of date.

The *Australian Privacy Principles* require a school not to store personal information longer than necessary or information that is no longer required. When personal information is no longer needed for the purpose for which it was collected, the school will destroy or de-identify it, in accordance with our records disposal reference list.

Access of personal information

Under the Commonwealth *Privacy Act*, an individual has the right to check or obtain access to any personal information which the Archdiocese of Hobart, CECT, TCEO or a school holds about them and to advise the CECT, TCEO or the school of any perceived inaccuracy. There are some exceptions to this right set out in the *Privacy Act*.

Such exceptions would include (but are not necessarily limited to) where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the school's duty of care to the student, or where students have provided information in confidence.

Students will generally have access to their personal information through their Parents, but older students may seek access themselves.

To make a request to check or obtain access to any information the school holds about you, please contact the TCEO Director of People and Culture in writing at the contact details at the end of this Privacy Policy. To make a request directly with the school, please contact the school's Principal in writing using the contact details at the end of this Privacy Policy.

The school may require you to verify your identity and specify what information you require. The school may charge a reasonable fee to cover the cost of verifying your request and locating, retrieving, reviewing and copying any material requested and time of staff. If the information sought is extensive the school will advise the likely cost in advance. If the school cannot provide you with access to that information, you will be provided with written notice explaining the reasons for the refusal.

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, a school will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. A school will treat consent given by Parents

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 10 of 15

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 a school directly or through the TCEO about them or their child by contacting the TCEO Manager of Risk and WHS Compliance, using at the contact details below. However, as described above, there will be occasions when access is denied. Such occasions may include 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, or where the student has provided information in confidence.

A school may, on the request of a student, grant that student access to the information held by the school about them, or allow the student to give or withhold consent to the use of their personal information, independently of their Parents. This would normally be done when the maturity of the student and/or the student's personal circumstances so warrant.

Enquires and complaints

If you would like further information about the way a school manages the personal information it holds, or would like to make a complaint about how your personal information is handled or you believe there has been a breach of your privacy please contact the TCEO Manager of Risk and WHS Compliance in writing at privacyofficer@catholic.tas.edu.au.

The TCEO and/or the school will investigate any complaint and will notify you of a decision in relation to your complaint in writing as soon as is practicable after it has been made.

If you are not satisfied with the response, you can make a complaint to the Office of the Australian Information Commissioner:

Email: enquiries@oaic.gov.au
Post: GPO Box 5218, Sydney, NSW, 2001
Phone: 1300 363 992
Fax: 02 9284 9666
website: <http://www.oaic.gov.au>

9 REFERENCES

The Privacy Act 1988 (Cth)
Australian Privacy Principles
NCEC & NCISA Privacy Compliance Manual

10 APPENDICES

Appendix 1 Standard Collection Notice
Appendix 2 Credit Information Privacy Policy

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 11 of 15

APPENDIX 1

Standard Collection Notice (Revised 2019)

1. 'Personal information' is defined in the *Privacy Act 1988* (Cth) as information or an opinion, whether true or not, about an individual whose identity is apparent or can reasonably be ascertained from the information. Personal information may include sensitive information about an individual. The Archdiocese of Hobart both independently and through its schools, the Catholic Education Commission Tasmania (**CECT**) and the Tasmanian Catholic Education Office (**TCEO**) collects personal information, including sensitive information, about students and parents or guardians (**Parents**) before and during the course of a student's enrolment at the school. This may be in writing or during conversations.
2. For the purpose of this personal information collection notice, if not explicitly stated, the term 'school' includes the TCEO and CECT. Personal information is managed in accordance with CECT's Privacy Policy, copies of which are available on request or from our website at the following link: <https://catholic.tas.edu.au/policies>. The policy includes information on how to access and correct yours or the student's personal information, as well as information on how to complain about potential breaches of yours or the student's privacy.
3. The primary purpose of collecting this information is to enable the school to provide schooling for the student and to enable them to take part in all the activities of the school.
4. 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.
5. Certain laws governing or relating to operation of schools require that certain information be collected and disclosed. These include relevant *Australian Curriculum, Assessment and Reporting Authority Act 2008* (Cth), the *Australian Education Act 2013* (Cth), the *Office of Tasmanian Assessment, Standards and Certification Act 2003* (Tas) and the *Public Health Act 1997* (Tas); and child protection laws.
6. Health information about students is sensitive information within the terms of the *Privacy Act 1988* (Cth).. We may ask you to provide medical reports and health information about the student from time to time.
7. If the school does not obtain the information referred to above we may not be able to enrol or continue the enrolment of the student.
8. The school from time to time discloses personal and sensitive information to others for administrative and educational purposes, including facilitating the transfer of the student between schools. This includes disclosures to other schools, government departments (such as the Department of Education and Training), government agencies (such as the Australian Curriculum, Assessment and Reporting Authority (**ACARA**)), statutory bodies (such as the Teachers Registration Board of Tasmania), medical practitioners, and people providing services to the school (such as specialist visiting teachers, sports and other coaches, music teachers, volunteers and counsellors).
9. The school also discloses personal and sensitive information to JDFL International Pty Ltd (ACN 141 220 644) and the Catholic Education Network (CENet) (ACN 125 288 762). These bodies own and operate the centralised digital student information management and storage platform called Compass and the centralised digital storage system called CeD3. Compass and CeD3 are used by the school for record keeping and information management purposes.
10. When a student moves between schools both operated by the Archdiocese of Hobart, the schools may exchange any and all personal information about the student. When a student moves from a school operated by the Archdiocese ("**original school**") to a school not operated by the Archdiocese ("**new school**"), the original school may provide personal information about the student to the new school with the consent of the student (or their Parent(s) on their behalf).
11. Certain 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 some school information relating to the circumstances of parents and students on the *MySchool* website.
12. Personal information collected from students is regularly disclosed to their parents or guardians. On occasions, information such as academic and sporting achievements, students activities and similar news is published in school newsletters, magazines and the School's website.

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 12 of 15

13. Personal information collected from one Parent may be disclosed to others responsible for payment of fees, including information about payments made or overdue.
14. The school may store personal information in the 'cloud', which may mean that it resides on servers, which are situated outside of Australia. However, the information will remain in the effective control of the Archdiocese of Hobart and its schools, who will take reasonable steps to ensure the overseas hosts comply with the Australian Privacy Principles.
15. If you provide the school with the personal information of others, such as doctors or emergency contacts, the school encourages 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 such information to third parties.
16. Medicare card numbers are collected for the purpose of providing those details to doctors and health professionals in circumstances where Parents are not contactable (to expedite emergency treatment and to cover any bulk billing costs associated with the treatment).
17. Information about whether or not you have a healthcare card may be collected for eligibility for concessions.
18. The school from time to time engages in fundraising activities. Information received from Parents may be used to make an appeal to Parents. It may also be disclosed to organisations that assist in the school's fundraising activities solely for that purpose. The school will not disclose personal information to third parties for their own marketing purposes without the individual's consent.
19. The school may, with Parents' consent, include contact details in a class list and school directory given to other Parents.
20. Personal information about the student may be used by the Archdiocese of Hobart for religious purposes, including inviting the student to participate in sacraments or Church activities.
21. Photographs of student activities such as sporting events, school camps and school excursions may be taken for and published in school newsletters and magazines and on our intranet. The school will obtain separate permissions from the students' Parents if we wish to include photographs or other identifying material in promotional material for the school or otherwise make it available to the public such as on the Internet.
22. Parents may seek access to personal information collected about them and the student by contacting the school. Students may also seek access to personal information about them. However, there will be occasions where 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 school's duty of care to the student, or where students have provided information in confidence.
23. Parents will be given written reasons if personal information held is not released upon request.
24. If Parents request access to personal information, the school will be entitled to charge reasonable fees for access to that information, to cover time spent by staff and photocopying costs.
25. Parents or students have a right to request an amendment to personal information if they believe it is incorrect, misleading or out of date.

Credit Information

26. The school is a credit provider to the extent payment for school fees, including expenses, levies and charges, are deferred for at least seven days.
27. In the event of a payment default, the school may seek credit information from and disclose credit information to credit reporting bodies in accordance with the Tasmanian Catholic Education Commission Credit Information Privacy Policy, available in electronic form from www.catholic.tas.edu.au and in hard copy from the Tasmanian Catholic Education Office or school.

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 13 of 15

APPENDIX 2

Credit Information Privacy Policy (Revised 2018)

1. The Tasmanian Catholic Education Office, The Catholic Education Commission Tasmania and each Catholic school operated by Roman Catholic Church Trust Corporation of the Archdiocese of Hobart (all referred to in the document as 'the school') may collect credit information including identification information, information about a person's current and past consumer credit liabilities, information about other credit that person has sought or obtained, information about their repayment of other credit, information held by a credit reporting body about them, information about their previous defaults, payments and payment arrangements relating to credit provided to them, information about their insolvency, information about court proceedings involving them, information from the Personal Property Securities Register, and publicly available information about their creditworthiness.
2. The school will only collect credit information from a credit reporting body, or provide credit information to a credit reporting body, in the event of a default in payment to the school by that individual. This information may be used by the credit reporting body to create or maintain a credit information file containing information about the individual, and may be shared by the credit provider with others.
3. Individuals seeking credit from the school (or guaranteeing payment by another person) consent and give the school authority to:
 - a. disclose information to and seek information from credit reporting bodies;
 - b. disclose information to and seek information from other fee payers and guarantors on the same account;
 - c. exchange credit information with other providers of credit to the individual, including credit history information, credit standing information, information about credit capacity and defaults; and
 - d. conduct public record searches, including searches of the Personal Property Securities Register;
4. The school may deal with the following credit reporting bodies: Veda (www.veda.com.au) and the Tasmanian Collection Service (www.tascol.com.au). Each provides their privacy policy (including in relation to credit information) on their website.
5. The school also collects and holds information about your current and previous credit liabilities. This can include information about credit the school provides to you as well as information they obtain from other credit providers.
6. The school collects, holds and uses credit information for the purpose of managing credit and recovery of debts. The school does not conduct credit reports on school fee payers unless they have defaulted in a payment or they are believed to pose a significant credit risk.
7. The school will only disclose a person's credit information to another entity when permitted by law. This includes disclosing information with the individual's consent, disclosing information to others who are also parties to a credit application (as principals or guarantors), and disclosing applications for credit, credit terms, defaults and serious credit infringements to credit reporting bodies, as described in this policy.
8. The school may disclose credit information to service providers or professional advisors where necessary for its activities and permitted by the *Privacy Act*, for example to debt recovery service providers, legal advisors, IT service providers, accountants, auditors or insurers.
9. An individual may at any time request access to their credit information by contacting the school. Access will be given unless giving access would be unlawful, denying access is required or authorised by or under an Australian law or a court/tribunal order, or giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body. The school may charge a reasonable fee for providing access, and may need to verify the individual's identity before providing access.
10. The school will take reasonable steps to ensure credit information is up-to-date, complete and accurate. An individual can request that their information is updated by contacting the school. If the school agrees the information needs updating, they will take reasonable steps to correct that information. In order to determine whether that information needs to be updated they may consult a credit reporting body or a credit provider, for example to confirm that a debt has been discharged. If they update the individual's information and have previously disclosed that information to another entity then they will also disclose the update to that other entity.

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 14 of 15

11. If the school does not agree the information needs correcting, the individual can ask them to put a statement on their file explaining what the individual says needs to be corrected. The school will do that in such a way as is apparent to staff who use that information.
12. Any refusal to provide access or to update credit information will be explained in writing. A decision will be made on providing access or updating information within 14 days, or 30 days if the decision is more complicated.
13. An individual can complain about interferences with their privacy, including breaches of this policy, the Credit Reporting Code (CR Code) or breaches of the *Privacy Act*. These complaints should be directed to the school principal in the first instance or the TCEO Manager of Risk and WHS Compliance in writing at privacyofficer@catholic.tas.edu.au. The school will endeavour to respond to all complaints within 14 days.
14. If an individual is not satisfied with how their complaint has been handled they can complain to the Credit and Investments Ombudsman. Complaints can be lodged through their website at www.cio.org.au or by phoning 1800 138 422.
15. Complaints can also be made to the Office of the Australian Information Commissioner. They can be contacted at the below details:

Email: enquiries@oaic.gov.au
 Post: GPO Box 5218, Sydney, NSW, 2001
 Phone: 1300 363 992
 Fax: 02 9284 9666
 website: <http://www.oaic.gov.au>

16. For further information about the collection of other personal and sensitive information please see the Catholic Education Commission Tasmania Privacy Policy available in electronic form from www.catholic.tas.edu.au and in hard copy from the Tasmanian Catholic Education Office or the school.

Document:	Date of commencement:	Page Reference:
Privacy Policy	12 September 2019	Page 15 of 15