Privacy Policy

Rationale
A Privacy Policy is needed to inform individuals about the practices of the school in relation to personal information. It also serves as a guide to the school's staff as to the standards to be applied in respect of handling personal information and ensure consistency in the school's approach to privacy.

Purpose
The purpose of this policy is to outline the school's use and management of personal information provided to or collected by it as bound by the Australian Privacy Principles contained in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Implementation

Information Collected
The type of information schools collect and hold includes (but is not limited to) personal information, including sensitive information, about:

- pupils and parents and/or guardians before, during and after the course of a pupil's enrolment at the school;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the school.

Personal Information you provide
The school will generally collect personal information held about an individual by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, and telephone calls. On occasions people other than Parents and pupils provide personal information.

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 or a reference from another school.

Exception in relation to employee records
Under the Privacy Act the National 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.

Use of personal information provided
The school will use personal information it collects from you 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 you have consented.

Pupils and Parents
In relation to personal information of pupils and Parents, the school's primary purpose of collection is to enable the school to provide schooling for the pupil. This includes satisfying both the needs of Parents and the needs of the pupil throughout the whole period the pupil is enrolled at the school.

The purposes for which a school uses personal information of pupils 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 pupils' 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.

In some cases where the school requests personal information about a pupil or parent, if the information requested is not obtained, the school may not be able to enrol or continue the enrolment of the pupil or permit the pupil 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, the 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 the school uses personal information of job applicants, staff members and contractors include:
- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for the school;
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

**Volunteers**

The school also obtains personal information about volunteers, who assist the school in its functions or conduct associated activities to enable the school and the volunteers to work together.

**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 pupils and staff thrive. Personal information held by a school may be disclosed to the Parents’ and Friends’ Association to assist in the school's fundraising.

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.

**Disclosure of personal information**

The school may disclose personal information, including sensitive information, held about an individual to:
- another school;
- government departments;
- our local parish;
- medical practitioners;
- people providing services to the school, including specialist visiting teachers and sports coaches;
- recipients of school publications, like newsletters and magazines;
- Parents; and
- anyone you authorise the school to disclose information to;
- anyone to whom we are required to disclose the information to by law.
Sending information overseas
The school may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, the school will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the National Privacy Principles;
- the school may also store personal information in the ‘cloud’ which may mean it resides on servers which are situated outside Australia.

Sensitive information
In referring to 'sensitive information', the school means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual.

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.

Management and security of personal information
All Staff are required to respect the confidentiality of pupils’ and parents’ personal information and the privacy of individuals.

The school has in place steps to protect the personal information the school holds (see Personal Information Policy) from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and pass--worded access rights to computerised records.

Checking what personal information a school holds about you
Under the Commonwealth Privacy Act [and the Health Records Act], an individual has the right to obtain access to any personal information which the School holds about them and to advise the School of any perceived inaccuracy. Pupils will generally be able to access and update their personal information through their Parents, but older pupils 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 or update any personal information the School holds about you or your child, please contact the School Principal in writing. The School may require you to verify your identity and specify what information you require. The School may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the School will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

Consent and rights of access to the personal information of pupils
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 pupil to the pupil's Parents. The school will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

Parents may seek access to personal information held by a school about them or their child by contacting the Principal. However, there will be occasions when access is denied. Such occasions would include 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 pupil.

The school may, at its discretion, on the request of a pupil grant that pupil access to information held by the school about them, or allow a pupil 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 pupil and/or the pupil’s personal circumstances so warranted.

**Enquiries**
If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles please contact the School Principal. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

**Resources**
On the CEVN site:
- Standard Collection Notice
- Alumni Collection Notice
- Employment Collection Notice
- Contractor / Volunteer Collection Notice
- Checklist for Compliance with APPS (Annexure 1 – summary of a School’s Obligations Imposed by the APPs)
- Disclosure Statement to Students

**Evaluation**
This policy will be reviewed as part of the school’s five year review cycle or as required.

**Ratification**
This policy was last ratified by St Mary’s Staff in March, 2014.
CHECKLIST FOR COMPLIANCE WITH THE AUSTRALIAN PRIVACY PRINCIPLES

(Annexure 1 – Summary of a School’s Obligations Imposed by the APPs)

This summary of a school’s obligations imposed by the Australian Privacy Principles (APPs), which can be used as a checklist for schools, is an extract from the document Privacy Compliance Manual, prepared by Minter Ellison Lawyers for schools and systems represented by the National Catholic Education Commission. The document was made available to schools in Victoria in November 2013.

For further information about the APPs, refer to Part 2 of the Privacy Compliance Manual.

Annexure 1 – Summary of A School’s Obligations Imposed By The Apps

1. Manage personal information in an open and transparent way.
2. Take such steps as are reasonable in the circumstances to implement practices, procedures and systems relating to Saint Mary’s functions or activities that:
   (a) will ensure compliance with the APPs; and
   (b) will enable Saint Mary’s to deal with inquiries or complaints about compliance with the APPs.
3. Have a clearly expressed and up-to-date Privacy Policy about Saint Mary’s management of personal information.
4. If it is lawful or practicable, give individuals the option of interacting anonymously with Saint Mary’s or using a pseudonym.
5. Only collect personal information that is reasonably necessary for Saint Mary’s functions or activities.
6. Obtain consent to collect sensitive information unless specified exemptions apply.
7. Use fair and lawful means to collect personal information.
8. Collect personal information directly from an individual if it is reasonable and practicable to do so.
9. If Saint Mary’s receives unsolicited personal information, determine whether it could have collected the information under APP 3 as if it had solicited the information. If so, APPs 5-13 will apply. If not, the information must be destroyed or de-identified.
10. At the time Saint Mary’s collects personal information or as soon as practicable afterwards, take such steps (if any) as are reasonable in the circumstances to make an individual aware of:
    (a) why Saint Mary’s is collecting information about them;
    (b) who else Saint Mary’s might give it to; and
    (c) other specified matters.
11. Take such steps (if any) as are reasonable in the circumstances to ensure the individual is aware of this information even if Saint Mary’s has collected it from someone else.
12. Only use or disclose personal information for the primary purpose of collection unless one of the exceptions in APP 6.2 applies (for example, for a related secondary
purpose within the individual's reasonable expectations, you have consent or there are specified law enforcement or public health and public safety circumstances).

13. If the information is sensitive, the uses or disclosures allowed are more limited. A secondary purpose within reasonable expectations must be directly related to the primary purpose of collection.

14. Do not use personal information for direct marketing, unless one of the exceptions in APP 7 applies (for example, Saint Mary’s has obtained consent or where the individual has a reasonable expectation of their information being used or disclosed for that purpose and Saint Mary’s has provided a simple means for the individual to unsubscribe from such communications).

15. Before Saint Mary’s discloses personal information to an overseas recipient it must take such steps as are reasonable in the circumstances to ensure that the recipient does not breach the APPs, unless an exception applies.

16. Government related identifiers must not be adopted, used or disclosed unless one of the exceptions applies (eg. the use or disclosure is reasonably necessary to verify the identity of the individual for the purposes of Saint Mary’s’s functions or activities).

17. Take such steps (if any) as are reasonable in the circumstances to ensure the personal information Saint Mary’s collects, uses or discloses is accurate, complete and up-to-date. This may require Saint Mary’s to correct the information and possibly advise organisations to whom it has disclosed the information of the correction.

18. Take such steps as are reasonable in the circumstances to protect the personal information Saint Mary’s holds from misuse, interference and loss and from unauthorised access, modification or disclosure.

19. Take such steps as are reasonable in the circumstances to destroy or permanently de-identify personal information no longer needed for any purpose for which Saint Mary’s may use or disclose the information.

20. If requested, Saint Mary’s must give access to the personal information it holds about an individual unless particular circumstances apply that allow it to limit the extent to which it gives access.

Note: This is a summary only and NOT a full statement of obligations.
CONTRACTOR / VOLUNTEER COLLECTION NOTICE

This contractor / volunteer collection notice is an extract from the document Privacy Compliance Manual, prepared by Minter Ellison Lawyers for schools and systems represented by the National Catholic Education Commission. The document was made available to Catholic schools in Victoria in November 2013.

For further information about this notice, refer to Section 9, page 30, of the Privacy Compliance Manual.

Contractor / Volunteer Collection Notice

1. In applying to provide services to Saint Mary’s, you will be providing Saint Mary’s School with personal information. We can be contacted at: Buckley St Yarram, 3971. Or on 03 5182 5659. The school email address is principal@stmyarram.catholic.edu.au.

2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.

3. You agree that we may store this information for up to 12 months.

4. Saint Mary’s Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the APPs.

5. We will not disclose this information to a third party without your consent. We usually disclose this kind of information to the Catholic Education Office, Diocese of Sale.

6. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect personal information about you in accordance with these laws.

7. Saint Mary’s may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.

8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to Saint Mary’s and why, that they can access that information if they wish and that Saint Mary’s does not usually disclose the information to third parties.
EMPLOYMENT COLLECTION NOTICE

This employment collection notice is an extract from the document *Privacy Compliance Manual*, prepared by Minter Ellison Lawyers for schools and systems represented by the National Catholic Education Commission. The document was made available to Catholic schools in Victoria in November 2013.

For further information about this notice, refer to Section 9, page 29, of the *Privacy Compliance Manual*.

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Employment Collection Notice

1. In applying for this position you will be providing Saint Mary’s School with personal information. We can be contacted at: Buckley Street Yarram, 3971. Or on 03 5182 5659. The school email address is mailto:principal@stmyarram.catholic.edu.au.

2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.

3. Saint Mary’s Privacy Policy contains details of how you may complain about a breach of the APPs or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.

4. We will not disclose this information to a third party without your consent. We usually disclose this kind of information to the following types of organisations: Saint Mary’s Parish Administrator and the Catholic Education Office, Diocese of Sale.

5. We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.

6. Saint Mary’s may store personal information in the ‘cloud’, which may mean that it resides on servers which are situated outside Australia.

7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to Saint Mary’s and why, that they can access that information if they wish and that Saint Mary’s does not usually disclose the information to third parties.
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<th>ITEM</th>
<th>COMPLIANCE MANUAL REFERENCE</th>
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<tr>
<td><strong>Adoption of a Privacy Policy</strong></td>
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<tr>
<td>1. The draft privacy policy has been reviewed to ensure that the school practices are in accord with the policy. Where required the template has been amended to reflect the school’s own practices.</td>
<td>Draft Privacy Policy Section 18 (page 73) Section 11.1 – 11.2 (page 51)</td>
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<td>2. Appropriate amendments (e.g. insert school name, name/title of contact person.</td>
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<tr>
<td>3. The school’s privacy policy has been published on the school’s website and/or displayed in a prominent place by 21 December 2001, along with standard collection notices. Copies are available on request.</td>
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<tr>
<td><strong>Appointment of a person/s responsible for privacy issues</strong></td>
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<td>4. The School has nominated a person responsible for privacy (the privacy contact).</td>
<td>Section 5.2 (page 10)</td>
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<tr>
<td><strong>Revision of current information handling practices and amendment of all relevant Documentation and forms</strong></td>
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<tr>
<td>5. A check has been made to ensure that information collected is ‘necessary’ for school activities (Use Section 4 of Manual (pages 8 &amp; 9) as a guide.</td>
<td>Section 7.1 to 7.3 (page 16). Section 4 (pages 8 &amp; 9) Collection Compliance tables (pages 30 – 32)</td>
<td></td>
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<tr>
<td>6. The following Collection Notices have been prepared:</td>
<td>Section 7.9 (page 18) Section 7.13 (pages 20-21) Section 7.12 (page 20) Section 7.14 (pages 21-22)</td>
<td></td>
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<tr>
<td>• A Standard Collection Notice</td>
<td></td>
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<tr>
<td>• An Employment Collection notice</td>
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<tr>
<td>• An Alumni Collection Notice</td>
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<tr>
<td>• Contractor / Volunteer Collection Notice</td>
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<tr>
<td><strong>7. A privacy policy and ‘Standard Collection Notice’ are provided with all new enrolment forms and with forms that collect medical information.</strong></td>
<td>Sections 7.7 – 7.9 (pages 17, 18) Section 7.10 (page 19)</td>
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<td>8. The Standard Collection Notice has been reproduced in:</td>
<td>Section 7.9 (page 18)</td>
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<tr>
<td>a) The school enrolment forms</td>
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<td>b) The school privacy policy</td>
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<td>c) The school Website</td>
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<td>d) The student diary</td>
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<td>9. A copy of the Standard Collection Notice has been sent to all current parents (e.g. with Term 1 fees).</td>
<td>Section 5.3 (page 11) Section 7.10 (page 19)</td>
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<tr>
<td>10. (Where relevant) Alumni Collection Notice is issued to past students.</td>
<td>Section 7.12 (page 20)</td>
<td></td>
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<tr>
<td>11. An Employment Collection Notice is issued with employment application forms and in reply to unsolicited job applications, where they are retained.</td>
<td>Section 7.13 (pages 20 – 21)</td>
<td></td>
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<tr>
<td>12. All new contractors and volunteers have been sent a modified version of the Employment Collection Notice.</td>
<td>Section 7.14 (page 21)</td>
<td></td>
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<tr>
<td>13. A script has been prepared based on Standard Collection Notice to comply with requirements for collection of information by telephone</td>
<td>Section 7.11 (page 20)</td>
<td></td>
</tr>
<tr>
<td>14. The school has checked to ensure that consent is obtained for disclosure of information not covered by the Standard Collection Notice</td>
<td>Section 8 (pages 35 – 42) Use and Disclosure Compliance table (page 41)</td>
<td></td>
</tr>
<tr>
<td>15. (Where relevant) appropriate steps have been taken to comply with requirements related to disclosure of non-sensitive information for direct marketing.</td>
<td>Section 8.4 to 8.6 (pages 39, 40)</td>
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**Education of all staff and personnel**

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<tr>
<td>16. The School’s Privacy Policy has been distributed to all current staff and relevant personnel.</td>
<td>Section 11.3 (pages 51 – 52) Section 5.4 (page 11)</td>
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**17. Acknowledgment has been received from all existing staff and relevant personnel that they have read and understood the Privacy Policy.**

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<tr>
<td>18. Explanatory, information sessions have been conducted for all existing staff and relevant personnel.</td>
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**Data quality**

St Mary’s Catholic Primary School, Yarram
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<td>19.</td>
<td>The school has established standard procedures to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date.</td>
<td>Sections 9.1, 9.2, 9.3 (pages 43-44)</td>
</tr>
<tr>
<td>20.</td>
<td>A disposal / retention schedule has been developed for all records containing information of a personal nature.</td>
<td>Sections 8, 10.6-10.8 (pages 48-49)</td>
</tr>
<tr>
<td>21.</td>
<td>Procedures have been adopted to ensure that:</td>
<td>Section 10.8 (pages 48-49)</td>
</tr>
<tr>
<td></td>
<td>(a) Records containing sensitive information such as health information are checked for accuracy before being used or relied upon.</td>
<td>Section 7.23-7.27 (pages 27-29)</td>
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<td></td>
<td>(b) A regular audit of all records of personal information is held whereby records that are not used are disposed of and inaccurate records updated.</td>
<td>Section 9.3 (pages 43-44)</td>
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<td>(c) Records no longer needed by the school are de-identified or destroyed.</td>
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<td>(d) An opportunity is made for the provider to update and ensure the accuracy of their personal information.</td>
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**Data security**

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<td>22.</td>
<td>Hard copy records are secured in locked cabinets with restricted access. Building alarms or similar security measures are in place.</td>
<td>Sections 10.1 – 10.4 (pages 46-47)</td>
</tr>
<tr>
<td>23.</td>
<td>Steps have been taken to ensure that unauthorised access to personal information is minimised.</td>
<td>Paragraphs 10.4.2 and 10.4.3 (page 47)</td>
</tr>
<tr>
<td>24.</td>
<td>Security of personal information in staff rooms or with staff has been checked.</td>
<td>Paragraph 10.4.3 (page 47)</td>
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<td>25.</td>
<td>Staff have been reminded of the need to keep personal information secure.</td>
<td>Paragraph 10.4.4 (page 47)</td>
</tr>
<tr>
<td>26.</td>
<td>Steps have been taken to ensure that personal information contained in databases is appropriately secure.</td>
<td>Paragraph 10.4.5 (page 47)</td>
</tr>
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<td>27.</td>
<td>Policies and security measures in respect of computer, email and Internet use have been reviewed and updated.</td>
<td>Paragraph 10.4.6 (page 47)</td>
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<td>Section 19 (page 74)</td>
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<td>28.</td>
<td>Paragraph 10.4.8 (page 47)</td>
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<td>29.</td>
<td>Paragraphs 10.5.1 and 10.5.2 (pages 47 – 48) Section 19 (page 74)</td>
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<td>30.</td>
<td>Section 10.5.2 (page 47) Section 19 (page 74)</td>
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<td>31.</td>
<td>Paragraph 5.5 (page 11), Section 12 (pages 53-56)</td>
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<td>32.</td>
<td>Section 13 (page 58)</td>
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<td>33.</td>
<td>Section 14 (page 59)</td>
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<td>34.</td>
<td>Section 15.3 (page 60-61)</td>
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<td>35.</td>
<td>Section 5.6 (pages 11-12)</td>
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<td>36.</td>
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</table>

**Access and correction**

31. The school has established a standard procedure for individuals to have access to, and copies of, their personal information, except where denial is permitted.

32. A check has been made to ensure that identifiers such as a Medicare Number, a Social Security number or a Tax File Number cannot be used to identify an individual.

33. The school has provided an option for individuals to remain anonymous.

**Transfer Overseas**

34. The school has procedures in place for ensuring requirements are complied with when circumstances of transferring personal information overseas arise.

**Complaints handling procedure and Breach of NPPs**

35. The School has developed, in conjunction with its Privacy Policy, a complaints handling procedure.

**Ongoing Compliance**

36. A process has been initiated to ensure ongoing compliance to legislation e.g. planned incorporation of policy and notices in school’s documentation; regular review of information handling procedures planned, further staff formation planned.