



Department of
Education

PRIVACY AND RESPONSIBLE INFORMATION SHARING POLICY

PRIVACY AND RESPONSIBLE INFORMATION SHARING FRAMEWORK

This PDF contains the following documents

Document 1:

Privacy and Responsible Information Sharing Policy v1.0

Effective: 12 November 2024

Document 2:

Privacy and Responsible Information Sharing Framework v1.0

Effective: 12 November 2024



Department of
Education

PRIVACY AND RESPONSIBLE INFORMATION SHARING

EFFECTIVE: 12 NOVEMBER 2024

VERSION: 1.0 FINAL

1. Policy statement

The Department of Education (the Department) is committed to protecting the privacy of personal and health information it collects, holds, manages, uses, discloses and shares, in accordance with relevant legislation and policies, in the fulfilment of its functions and activities.

2. Policy rules

All employees must manage personal, including sensitive, and health information in accordance with the Privacy and Responsible Information Sharing (PRIS) Framework.

3. Responsibility for implementation and compliance

All employees are responsible for implementing this policy.

The Information Privacy and Governance team is responsible for compliance monitoring.

4. Scope

This policy applies to all employees.

5. Definitions

Personal Information means information or an opinion, whether true or not, and whether recorded in material form or not, that relates to an individual, whether living or dead, whose identity is apparent or can reasonably be ascertained from the information or opinion, and includes:

- a name, date of birth or address
- a unique identifier, online identifier or pseudonym
- contact information
- information that relates to an individual's location
- technical or behavioural information in relation to an individual's activities, preferences or identity
- inferred information that relates to an individual, including predictions in relation to an individual's behaviour or preferences and profiles generated from aggregated information
- information that relates to one or more features specific to the physical, physiological, genetic, mental, behavioural, economic, cultural or social identity of an individual

Sensitive Personal Information means personal information that relates to an individual's:

- racial or ethnic origin
- gender identity (when differs from designated sex at birth)
- sexual orientation or practices
- political opinions or memberships of a political association
- religious beliefs or affiliations
- philosophical beliefs

- memberships of a professional or trade association or trade union
- criminal record
- health information or genetic information
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification
- biometric templates.

Health Information means personal information that relates to an individual's health, illness, disability or injury. This includes an individual's expressed wishes about the future provision of health services, or a health service provided or to be provided to an individual. Health information also includes other personal information collected, to provide, or in providing, a health service to an individual.

For example, health information may include:

- notes of symptoms or diagnosis
- specialist reports and test results
- prescriptions and other pharmaceutical purchases
- dental records
- appointment and billing details
- information collected in connection with donations or intended donations of organs, body parts or body substances
- genetic information that is, or could be, predictive of the health of an individual or a genetic relative of an individual.

6. Related documents

Relevant legislation or authority

Auditor General Act 2006

Australian Privacy Principles 2014 (Cth)

Children and Community Services Act 2004 (WA)

Code of Conduct and Standards

Corruption, Crime and Misconduct Act 2003 (WA)

Criminal Code Act Compilation Act 1913 (WA)

Criminal Procedures Act 2004 (WA)

Disability Services Act 1993 (WA)

Education and Care Services National Law Act 2012 (WA)

Electronic Transactions Act 2011 (WA)

Equal Opportunities Act 1984 (WA)

Evidence Act 1906 (WA)

Freedom of Information Act 1992 (WA)

Freedom of Information Regulations 1993 (WA)

Privacy Act 1988 (Cth)

Privacy and Responsible Information Sharing Bill 2024 (WA)

Public Interest Disclosure Act (2003)

Public Sector Code of Ethics (2007) (WA)

[Public Sector Management Act 1994 \(WA\)](#)

[School Education Act 1999 \(WA\)](#)

[School Education Regulations 2000 \(WA\)](#)

[Schools Curriculum and Standards Authority Act 1997 \(WA\)](#)

[State Records Act 2000 \(WA\)](#)

[Teacher Registration Act 2012 \(WA\)](#)

Related Department policies

[Child Protection in Department of Education Sites](#)

[Councils and Boards in Public Schools](#)

[Criminal History Screening for Department of Education Sites](#)

[Cyber Security](#)

[Duty of Care for Public School Students](#)

[Employee Performance](#)

[Enrolment in Public Schools](#)

[Injury Management and Workers' Compensation](#)

[Managing a Breach of the Public Sector Standard Claims](#)

[Records Management](#)

[Recruitment, Selection and Appointment](#)

[Research Conducted on Department of Education Sites by External Parties](#)

[Security for Public Schools and Residential Facilities](#)

[Software Use](#)

[Student Attendance in Public Schools](#)

[Student Health in Public Schools](#)

[Students Online in Public Schools](#)

[Telecommunications Use](#)

Other documents

[Protective Security Policy Framework](#)

[Delegation information relating to the disclosure of information](#)

[Information statement](#)

[Ikon privacy statement](#) (Staff only)

[Manage student information in SIS Classic](#) (Staff only)

[Manage student files at your school](#) (Staff only)

[2024 WA Government Cyber Security policy](#)

[Western Australian Information Classification policy](#)

[WA Whole of Government Open Data policy](#)

7. Contact information

Policy manager:

Director, Business and Customer Services

Policy contact officer:

Principal, Consultant Information Privacy

8. Review date

12 November 2027

9. History of changes

Effective date	Last update date	Policy version no.	Ref no.	Notes
This table will be completed by the Governance Unit.				
12 November 2024		1.0	D24/0353285	New policy, endorsed by the Director General at the Corporate Executive meeting held on 11 September 2024. D24/0653005

Privacy and Responsible Information Sharing Framework

Effective Date: 12 November 2024

1.0 Purpose

The purpose of this framework is to clearly set out how the Department of Education (the Department) collects, manages, uses and shares personal and health information to fulfil its functions and activities. The framework follows the principles as defined in the *Commonwealth Privacy Act 1988* and the *Privacy and Responsible Sharing (PRIS) Bill 2024* and supports the open and transparent management of personal information.

2.0 Collection of personal information

Why do we collect personal information?

The Department will collect the personal information of individuals necessary to carry out its core functions and activities. The primary purpose for collecting personal information includes:

- education of students
- student administration
- communicating and engaging with parents
- recruitment and employment (including volunteers, contractors and service providers)
- supporting student and employee social and emotional wellbeing, health and behaviour
- management and administration of the Department (including schools)
- informing policy and strategy
- research or statistical purposes
- insurance purposes (including legal claims)
- legal obligations.

What information do we collect?

The Department will collect and use a broad range of personal, sensitive and health information, which may include the following:

- name (including aliases), gender, date of birth, place of birth, racial or ethnic origin
- contact details (address, email, phone number)
- emergency contact details
- health information, Medicare and private health details
- immunisation status and/or history
- personal circumstances such as occupation, marital status, parenting and access arrangements
- identification documents such as birth certificate, driver's licence, passport or visa, Australian citizenship or residency documents

- photographs, video recordings, audio recordings, CCTV footage
- education history
- employment history and qualifications
- working with children checks and criminal screening
- teacher registration information
- financial information such as banking details
- government identifiers such as the WA student number or Unique Student Identifier.

How do we collect this information?

Personal information can be collected in the following circumstances:

- [student enrolment](#)
- educational purposes
- [employee recruitment](#)
- Department administration
- human resource management
- health and wellbeing of an individual
- protection of the wellbeing of an individual
- tender applications
- contract and funding agreements
- [campaigns and initiatives](#)
- [information access requests](#) (staff only)
- [complaints](#)
- software and applications
- websites
- investigations
- audits
- defence of a legal claim
- as required by law.

The Department will take all reasonable steps to ensure that personal information collected, used or disclosed is accurate, complete, up to date and relevant.

3.0 Use and disclosure of personal information

Personal information collected by the Department will be used, disclosed or shared for the primary purpose it is collected, including as follows:

- for a primary purpose (as defined above)
- for a related secondary purpose where one of the following applies:
 - it is reasonable for it to be expected in line with the primary purpose
 - with consent of an individual or parent/ legal guardian
 - when the Department reasonably believes it is necessary to prevent or lessen a serious threat to the life, health, safety or welfare of any individual, public health, public safety or public welfare or a threat to any individual due to family violence
 - when required or authorised by law
 - when required under the *Children and Community Services Act 2004*
 - to investigate or report suspected unlawful activity, or when reasonably necessary for a specified law enforcement purpose, including the prevention or investigation of a criminal offence or seriously improper conduct, by or on behalf of a law enforcement agency
 - as de-identified information, for research or school statistics purposes, or to inform departmental policy and strategy

- to establish or respond to a legal claim
- in the transfer of students' records between public schools
- on receipt of a notice of transfer with parental consent from a non-government school (information on transfers between schools is available in the Enrolment in public schools policy and procedures).

4.0 Protection of personal information

The Department will take all reasonable steps to protect information from misuse, loss, unauthorised access, modification and disclosure. Management of electronic and paper records are consistent with the Department's [Records Management policy and procedures](#), [Recordkeeping plan](#) (staff only), [Cyber Security policy](#) and the [State Records Act 2000](#) and [State Records Commission Standards](#).

Unless unlawful to do so, when personal information is no longer required it is destroyed or permanently de-identified, in compliance with the [Retention and Disposal schedule](#) (staff only).

5.0 Access and correction of personal information

All individuals, or their authorised representative(s), have a right to request access to or correction of personal information that the Department holds about them, providing access to this information or record does not pose a risk to the safety of a child or children.

For further information on access to personal information, please see: [Freedom of Information](#), [Access to Information](#) (staff only) and [Freedom of information requests](#) (staff only).

6.0 Automated decision-making

If the Department engages in any automated decision-making process that involves the personal information of an individual, an assessment will be conducted in line with the relevant legislation and the Department's values, policies and procedures.

7.0 Complaints and breach of privacy

Complaints specifically about the Department's, including schools', handling of personal information are managed in line with the Department's [Complaints and Notifications Policy](#).

The Department will manage the prevention, containment, remediation and investigation when a breach of information occurs in line with the [Information Breach policy and procedures](#).