



# St Mary's College Seymour Collection Notice for Privacy Compliance

1. The College collects personal information, including sensitive information about students and parents or guardians and family members before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations and may be direct from the individual or from another source. The primary purpose of collecting this information is to enable the College, Catholic Education Offices and the Catholic Education Commission of Victoria Ltd (CECV) to meet its educational, administrative and duty of care responsibilities to the student to enable them to take part in all the activities of the College.
2. Some of the information the College collects is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts and Public Health and Child Protection laws.
4. Health information about students (which includes information about any disability as defined by the *Disability Discrimination Act 1992*) is sensitive information within the terms of the Australian Privacy Principles (APPs) under the *Privacy Act 1988*. The College may require medical reports about students from time to time and may otherwise collect sensitive information about students and their families.
5. If any personal information requested by the College is not provided, this may affect the College's ability to enrol a student, respond to enquiries, provide the student with educational and support services or allow a person to visit the College.
6. The College may disclose personal and sensitive information for **administrative, educational and support purposes** (or may permit the information to be directly collected by third parties). This may include to:
  - College service providers such as the CECV, Catholic Education Offices, school governing bodies and other dioceses
  - third party service providers that provide online educational and assessment support services or applications (apps) including SAS, CareMonkey, Simon or services in relation to school improvement surveys, which may include email and instant messaging
  - College systems, including SAS, CareMonkey, Simon, Google and Apple. Limited personal information may be collected and processed or stored by these providers in connection with these services
  - CECV and Catholic Education Offices to discharge its responsibilities under the *Australian Education Regulation 2013* (Regulation) and the *Australian Education Act 2013* (Cth) (AE Act) relating to students with a disability, including ongoing evaluation of funding adequacy for individual students
  - CECV to support the training of selected staff in the use of schools' systems, such as SAS, CareMonkey, Simon
  - another school to facilitate the transfer of a student
  - Federal and State government departments and agencies acting on behalf of the government e.g. for audit purposes
  - health service providers, and people providing educational support and health services to the College, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools

- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority
  - people providing administrative and financial services to the College
  - anyone you authorise the College to disclose information to; and
  - anyone to whom the College is required or authorised to disclose the information to by law, including under child protection laws.
7. The College is required by the Federal *Australian Education Regulation (2013) and Australian Education Act 2013 (Cth) (AE Act)* to collect and disclose certain information under the *Nationally Consistent Collection of Data (NCCD)* on students with a disability. The College provides the required information at an individual student level to the Catholic Education Offices and the CECV, as an approved authority. Approved authorities must comply with reporting, record keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.
  8. Personal information collected from students is regularly disclosed to their parents or guardians.
  9. The College may also use cloud computing service providers to store personal information (which may include sensitive information) on their servers in the 'cloud'. These servers may be located in or outside Australia. This may mean that personal information may be stored or processed outside Australia.
  10. The College makes reasonable efforts to be satisfied about the protection of any personal information that may be collected, processed and stored outside Australia in connection with any cloud and third party services and will endeavour to ensure it will be located in countries with substantially similar protections as the APPs.
  11. When the College uses Google's G-Suite including Gmail, some personal information (usually limited to name and email address) about students, parents or guardians may be transferred, stored and processed by Google in the United States, or in any other country through which Google provides these services or where it processes and stores information. This personal information will be stored and processed by Google in accordance with Google's terms and conditions stated in the G-Suite for Education Agreement which the College entered into with Google.
  12. The countries in which the servers of cloud service providers and other third party service providers may be located are:
    - United States of America, Canada, New Zealand, United Kingdom, Japan, Singapore, Taiwan, and members of the European Union.
  13. Where personal, including sensitive information is held by a cloud computing service provider on behalf of CECV for educational and administrative purposes, it may be stored on servers located within or outside Australia.
  14. College personnel and the College's service providers, and the CECV and its service providers, may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering the ICON system and ensuring its proper use.
  15. The College may disclose limited personal information to the College parish to facilitate religious and sacramental programs, and other activities such as fundraising.
  16. The College's Privacy Policy is accessible via the College website or from the College office. The policy sets out how parents, guardians or students may seek access to, and correction of their personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, or may result in a breach of the College's duty of care to the student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.

17. The College's Privacy Policy also sets out how parents, guardians, students and their family can make a complaint if they believe the College has interfered with their privacy [and how the complaint will be handled].
18. The College may engage in fundraising activities. Information received from you may be used to make an appeal to you. [It may also be disclosed to organisations that assist in the College's fundraising activities solely for that purpose.] We will not disclose your personal information to third parties for their own marketing purposes without your consent.
19. On occasions information such as academic and sporting achievements, student activities and similar news is published in College Marian and magazines, on our intranet [and on our website]. This may include photographs and videos of student activities such as sporting events, College camps and college excursions. The College will obtain permissions from the student's parent or guardian (and from the student if appropriate) prior to publication to enable the College to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet. The College may obtain permissions annually, or as part of the enrolment process. Permissions obtained at enrolment may apply for the duration of the student's enrolment at the College unless the College is notified otherwise. Annually, the College will remind parents and guardians to notify the College if they wish to vary the permissions previously provided. [We may include student's and parents' or guardians' contact details in a class list and College directory.]
20. If you provide the College with the personal information of others, such as other family members, doctors or emergency contacts, we encourage you to inform them you are disclosing that information to the College and why, that they can request access to and correction of that information if they wish and to also refer them to the College's Privacy Policy for further details about such requests and how the College otherwise handles personal information it collects and complaints it receives.

**Revised:**        **August 2019**

**Review:**        **August 2021**