



Privacy Policy

Document Control

Document Details

Document Name	Privacy Policy
Document created by	Director of Risk and Compliance/Child Safety Officer
Document Approval	Leadership Team

Document Management

Relevant to	All staff, volunteers, contractors, all parents/caregivers and students
Related documents include but not limited to:	Privacy Breach Procedure and Response Protocol Enrolment Policy Psychologist Policy Complaints Policy Child Information Sharing Scheme Policy Family Violence Sharing Scheme Policy
Related Legislation/Guidelines includes but not limited to:	Privacy Act 1988 (Cth) Health Records Act 2001 (Vic) Australian Privacy Principles Health Privacy Principles Notifiable Data Breach Scheme Australian Education Regulation 2013 Australian Education Act 2013 Nationally Consistent Collection of Data (NCCD)
Review	The Policy shall be reviewed every 1 - 3 years or as required

Change History

Author	Date	Change Description	Version
W Ross	2016	Original Privacy Policy created, reviewed and approved	V1
B Carmichael N Visic	Feb 2018	Original document created from previous Privacy Policy. Reviewed by Risk and Compliance Manager and changes updated	V2
B Carmichael N Visic, W Ross	Mar 2018	Reviewed by Leadership and approved subject to minor edits	V2
N Visic	Feb 2019	Minor edits suggested by Leadership made	V3
N Visic	Aug 2019	Catholic Education Melbourne School Improvement Survey (CEMSIS) amendments made including updates made to Privacy Policy and title of the Policy	V4
N Visic	Oct 2019	Update Privacy Policy reviewed and approved by Leadership	V4
N Visic	Nov 2019	Privacy Policy communicated to all staff and published to Firefly and website	V4
M Zanolunghi	Aug 2021	Privacy Policy reviewed, updated with non-material changes in accordance with CECV Privacy Policy requirements.	V4.1
N Visic	April 2026	Privacy Policy reviewed, updated with non-material changes in accordance with CECV Privacy Policy requirements	V5



Privacy Policy

Introduction

It is the policy of Sacré Cœur to live out the values that reflect its Sacred Heart tradition. These values are embodied in the Five Goals of Sacred Heart education, which are:

1. A personal and active faith in God
2. A deep respect for intellectual values
3. The building of community as a Christian value
4. A social awareness that impels to action
5. Personal growth in an atmosphere of wise freedom

Privacy Policy

The School is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988. The School is also bound by the Health Records Act 2001 (Vic.) and the Health Privacy Principles in that Act. The School may, from time to time, review and update this Privacy Policy considering new laws, technology, changes to the School's operations and practices and to make sure it remains appropriate and current to the changing school environment.

1. Purpose

This policy describes Sacré Cœur's (the School) process when using and managing personal information, health information or sensitive information that is either provided or collected by the School. The primary purpose of collecting personal information is to enable the School to provide educational and support services for students. This includes satisfying the needs of parents and/or caregivers (described as 'parents' throughout this document), the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School. For more information on the School's Collections Notice, please refer to [Appendix 1](#).

2. Scope

This policy applies to all personal and sensitive information (including health information) handled by Sacré Cœur. Personal and sensitive information is classified according to its confidentiality and risk profile and is handled in accordance with its classification.

3. Personal Information and Enrolment

In some cases where the School requests personal information about a student or parent and if the information requested is not provided, 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.

4. What information do we collect?

The type of information the School collects and holds includes, but is not limited to, personal information, including health and other sensitive information, about:

- a. Students and parents before, during and after the course of a student's enrolment at the School
 - Name, contact details (including next of kin and emergency contacts), date of birth, country of birth, citizenship, gender, language background, previous school and religion
 - Parents' education, occupation, language and citizenship background
 - Health information (e.g. details of disability and/or allergies, and details of any assistance the student receives in relation to those disabilities, medical reports, names of doctors)
 - Victorian Student Number (VSN)
 - results of assessment tasks and other classroom activities
 - Conduct and complaint records, or other behaviour notes, school attendance and school reports both from the School and from other schools
 - Information about referrals to government welfare agencies
 - Counselling reports
 - Health fund details and Medicare number
 - Any Family Court orders

- Criminal records
 - Volunteering information (including Working with Children Checks)
 - Photos and videos at school events, activities and through closed circuit television (CCTV)
- b.** The personal information of job applicants, staff members, volunteers, visitors and contractors
- Name, contact details (including next of kin and emergency contacts), date of birth and religion
 - Information on job application
 - Qualifications, registrations and professional learning history
 - Salary and payment information, including banking and superannuation details
 - Health information (e.g. details of disability and/or allergies and medical certificates)
 - National police check and working with children check
 - Drivers license and registration of vehicle
 - Complaint records and investigation reports
 - Leave details
 - Photos and videos at school events
 - Workplace surveillance information, including CCTV footage
 - Work emails and private emails (when using work email address) and internet browsing history
- c.** Suppliers, donors, members and visitors including, but not limited to:
- name, contact details
 - work email and private email (when using work email address) and internet browsing history
- d.** 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
- e.** Other people who may come into contact with the School

5. Personal Information provided by you

The School will generally collect personal information through a number of ways listed below, but not limited to:

- Through the completion of forms
- Face-to-face meetings or interviews
- Emails, telephone calls, invoices or consent forms
- School-controlled social media
- Letters to the School
- Website notification or online tools such as apps and other software used by the School
- Through any CCTV cameras located at the School
- Photography and videography
- People (other than parents and students) provide personal information and where this is the case, this information may also be collected
- On occasions people other than parents and students (such as job applicants and contractors) provide personal information to the School

6. 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. The type of information the School may collect from another school may include:

- Academic records and/or achievement levels
- Information that may be relevant to assisting the new school meet the needs of the student including any adjustments

7. Personal Information collected about other people

In some circumstances the School may collect personal information about other people when (but not limited to):

- Assessing applicant's suitability for employment or volunteering
- Administering employment or volunteering placement
- Public liability or WorkCover insurance purposes
- Employment and contractual obligations

- Occupational Health and Safety laws and/or when required to investigate incidents
- Legal claim responses

8. Exceptions 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. The School handles staff health records in accordance with the Health Privacy Principles in the Health Records Act 2001 (Vic.).

9. Anonymity

The School needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate the delivery of schooling to its students and its educational and support services, conduct the job application process and fulfil other obligations and processes. However, in some limited circumstances some activities and interactions with the School may be done anonymously where practicable, which may include making an inquiry, complaint, a Whistleblower report or providing feedback.

10. How will the School use the personal information you provide?

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 by you, or to which you have consented. In relation to personal information of students and parents, the School's primary purpose of collection is to enable the School to provide educational and support services to students enrolled at the School, exercise the School's duty of care and perform necessary associated administrative activities which will enable students to take part in all the activities of the School, including but not limited to:

10.1 Students and Parents/Caregivers:

- Admissions and enrolment
- Providing schooling and school activities
- Satisfying the needs of Parents, the needs of Students and the needs of the school during the whole period of a Student's enrolment in the school
- making the required reports to government authorities
- Delivering a high quality, relevant and contemporary educational experience
- Keeping parents informed about matters related to their daughter's schooling, through correspondence, newsletters and magazines
- Day-to-day administration, operations and quality assurance
- Seeking and processing the payment of school fees
- Allowing schools to discharge duty of care and child safety obligations
- Looking after students' educational, social, health and emotional wellbeing needs
- Seeking donations and marketing for the School
- Managing the physical and electronic security of the School
- Satisfying the School's legal obligations and discharging its duty of care
- Taking reasonable steps to reduce risk of harm to students, staff, parents or visitors
- Making reasonable adjustments by providing support to students with disabilities
- Providing a safe and secure workplace
- Ensuring effective management, resourcing, administration, statutory duties, planning, funding, monitoring, regulating, evaluating policies and processes, complying with reporting, mitigating risks, investigating incidents and responding to any legal claims
- Seeking feedback from students and parents on school performance and improvement, including through school improvement surveys
- Satisfying the School service providers' legal obligations

10.2 Employees:

- Administering the individual's employment or contract including:
 - Corresponding with employees
 - Professional learning and development processes

- Salary and payment information, including superannuation details
- Medical details (e.g. details of disability, and / or allergies, medical certificates)
- Complaint records and investigations
- Administrative matters including for insurance purposes
- Looking after staff occupational, social, spiritual and health wellbeing
- To respond in the event of an emergency
- For evaluation and improvement of the work environment
- Satisfying the school's legal obligations, for example, in relation to child protection legislation

10.3 Job Applicants and Contractors

In relation to personal information of job applicants and contractors, the School's primary purpose of collection is to assess and (if successful) to engage the applicant, or contractor which includes, but not limited to:

- Assessing and if successful, engaging an applicant or contractor
- Information provided by a former employer or a referee
- Making an offer of employment or engagement
- Administering the individual's employment or contract, as the case may be
- For insurance purposes
- Seeking donations and marketing for the School
- Satisfying the School's legal obligations (i.e. in relation to child protection legislation)
- Administrative matters including for insurance purposes
- Fulfilling a contract obligation
- Corresponding with individuals to administer their relationship with the school

10.4 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, to confirm their suitability and to manage their visits. This includes, but is not limited to:

- Administrative matters including for insurance purposes
- Satisfying the school's legal obligations, for example in relation to child protection legislation

10.5 Third Parties

- Sacré Cœur may share Personal information (including Sensitive information) with third parties where it is necessary and appropriate for the purposes set out above including but not limited to: other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student, and schools where concurrent applications for enrolment are made to those schools
- Government departments (including for policy and funding purposes)
- The Victorian Catholic Education Authority (VCEA) or related agencies / entities and schools
- Local parishes associated with the school
- Medical and health practitioners
- People providing educational support and health services to the school, including specialist visiting teachers, health professionals, sports coaches, volunteers and counsellors
- Camp, excursion and student trip providers
- Fundraising organisations, venues and event organisers, marketing and communication agencies
- Specialist advisory services including in human resources, child protection and students with additional needs and providers of learning and assessment
- Authorised agencies and organisations to whom the school is required to disclose personal information for administrative, educational and research purposes including:
 - the Australian Curriculum, Assessment and Reporting Authority (ACARA)
 - NAPLAN Test Administration Authorities
 - Victorian Curriculum and Assessment Authority (VCAA)
 - Nationally Consistent Collection of Data (NCCD) for quality assurance processes
 - participation in the Australian Early Development Census (AEDC) and government audits
- Regulatory, investigative and law enforcement or government bodies such as to enable the school to discharge its responsibilities under child safety legislation, including Commission for Children and Young People (CCYP), Victorian Institute of Teaching (VIT) and Victoria Police.

- Where a 'permitted general situation' as defined in the Privacy Act exists
- People and organisations providing administrative, technology, professional, and financial services
- Other providers of specific information management and storage systems and other information technology services
- Recipients of specific publications, such as school newsletters and magazines
- Financial institutions for payment processing
- Referees whose details job applicants provide to the school
- Students' Parents
- Anyone you authorise the school to disclose information to
- Anyone to whom the school is required or authorised by law to disclose the information, including child protection laws

10.6 School Psychologists

The School has employed School Psychologists who provide counselling services and/or assessment services for some students. The Principal may require the School Psychologists to inform him/her or other teachers or non-teachers of any issues the Principal and the School Psychologists believes may be necessary for the School to know for the wellbeing or development of the student who is counselled or other students at the School.

10.7 Marketing and Fundraising

The School treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the School may be disclosed to organisations that 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, magazines and social media, which include personal information and sometimes people's images, may be used for marketing purposes. Consent for marketing or fundraising communications may be withdrawn at any time by notifying the School in writing. Withdrawal of consent will apply prospectively and will not affect prior lawful use of information.

11. Associated Legislation and Schemes

Sacré Cœur is an information sharing entity (ISE) in accordance with the Child Wellbeing and Safety (Information Sharing) Amendment Regulations 2020 (Vic.). This legislation broadens the circumstances in which the school may share information to support the wellbeing and safety of children and students. Sacré Cœur maintains appropriate confidentiality when it provides information under legislated information sharing schemes, being Child Information Sharing Scheme (CISS) or Family Violence Information Sharing Scheme (FVISS) or under the Terrorism (Community Protection) Act 2003 (Vic.). Under the Notifiable Data Breaches (NDB) scheme, Sacré Cœur must inform the Office of the Australian Information Commissioner and affected individuals of any data breach likely to result in serious harm to individuals whose personal information contained in the breach.

12. Unsolicited information

We may receive information that we have taken no active steps to collect. If this is the case and if permitted/required by law, we may keep records of this information. However, we may destroy the information when practicable, lawful or when it is reasonable.

13. Who might the School disclose personal information to and store your information with?

The School may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include but is not limited to:

13.1 Storage of Personal Information

Sacré Cœur may store Personal information in hard copy or electronically. Sacré Cœur will store Personal information until no longer required, including where the law requires to retain Personal information. The School takes reasonable steps to protect information from misuse and loss and from unauthorised access, modification and disclosure. The School stores all paper and electronic records

securely. All school records are securely disposed of, or transferred to internal archives. When using software and contracted service providers to manage information, these are assessed in accordance with the appropriate department process or role description.

13.2 Security of Personal Information

Sacré Cœur have reasonable steps in place to ensure the protection of Personal information that it holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and access controls to electronic data. These steps include, but are not limited to:

- Restricting access to information on school systems and local databases to a 'need to know' basis with access levels allocated to staff based on their roles and responsibilities
- Ensuring all staff are aware that they are not to reveal or share personal passwords
- Ensuring storage of hard copy files containing personal and health information in lockable cabinets in lockable rooms. The School restricts access to these files on a need to know basis
- Implementing physical security measures around the premises to prevent break-ins
- Implementing ICT security systems, policies and procedures designed to protect information storage on computer networks
- Appropriate controls are applied to protect personal information during transmission, including the use of approved secure communication and file-transfer mechanisms.
- Privacy and information security impacts are considered during the design, acquisition, or implementation of new systems, services, or technologies that involve personal information.
- Implementing human resource policies and procedures including a code of conduct, and policies for email and internet usage, information and records management designed to ensure that staff follow correct protocols when managing personal information
- Undertaking due diligence with respect to third party providers, including cloud service providers, who may have access to personal information to ensure as far as practicable that they are compliant with the APP or a similar privacy regime

The School must be notified immediately if a student, parent or a member of the school community believe that their personal information has been compromised.

13.3 Sending and Storing information overseas

Sacré Cœur may disclose personal information about an individual to overseas recipients in certain circumstances where it is necessary to perform its functions and activities. For example, to facilitate a school student tour or similar, or in connection with any third-party cloud service provider.

Sacré Cœur may provide some limited personal information to these service providers to enable them to authenticate users that access their services and provide technical support (e.g., services relating to email, instant messaging and education and assessment applications).

Sacré Cœur may store personal information in the cloud. This means information may reside on a cloud service provider's server which may be situated outside Australia. Examples include Google, which provides GAFE including Gmail, and stores and processes limited personal information for that purpose.

Sacré Cœur makes reasonable efforts to be satisfied about the security of any personal information collected, processed and stored outside Australia, in connection with any cloud and third-party services. The school will take reasonable steps to ensure cloud service providers are hosted in Australia or otherwise in countries with substantially similar protections as the APP. 1

Where personal information is disclosed to an overseas recipient, the School takes reasonable steps to ensure that the recipient handles the information in a manner consistent with the Australian Privacy Principles, including through contractual, security, and governance measures. The School does not rely solely on the geographic location of data hosting as a privacy control. For further information about locations where a school stores personal information using cloud service provides, please contact the principal of the school.

13.4 Other

- School service providers which provide educational, support and health services to the School, (either at the School or off campus) including the Catholic Education Commission of Victoria Ltd (CECV),

Catholic Education Offices, specialist visiting teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools

- Third party service providers that provide online educational and assessment support services, services in relation to school improvement surveys, document and data management services, training and support services, hosting services and software as a services application or applications to schools and school systems including Synergetic, Firefly, Education Perfect, Consent2Go, Microsoft and Google's G Suite for Education, including for the purposes of facilitating access, and where necessary, to support the training of selected staff in the use of 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. Other third parties which the school uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with parents/caregivers
- Another school including to its teachers to facilitate the transfer of a student
- Federal and State government departments and agencies
- Health service providers
- Recipients of School publications, such as newsletters and magazines
- Students, parents or caregivers and their emergency contacts
- Assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority
- Anyone to whom you authorise the School to disclose information
- Anyone who we are required or authorised to disclose the information to by law, including child protection laws
- Another school for the purpose of transferring schools which enables the next school to continue to provide education, support, health and wellbeing and/or fulfil legal requirements
- NAPLAN results when students transfer schools or when required to evaluate a school's education program
- Medical practitioners
- If/when necessary to mitigate health, safety or wellbeing risks
- When required by the law such as duty of care, anti-discrimination laws, OHS laws, reporting obligations, court orders or Victorian Police warrants
- Investigate, report or prevent activities or incidents, misconduct, criminal offence, legal claims or on behalf of a law enforcement agency
- School statistics, research or reporting requirements
- Responding to complaints received from students, parents/caregivers, staff, contractors, volunteers or complaints received from the community
- 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

14. Access and correction of personal information

Under the Privacy Act and the Health Records Act, an individual has the right to seek access to and or correction of any Personal information which Sacré Cœur holds about them. There are some exceptions to access and correction rights which are set out in the applicable Act. For general inquiries about access and correction refer to the contact details below. To make a request to access, update or correct any personal information that the school holds about you or your child, please contact the principal by email, post or telephone in the first instance. Refer to the school's website for contact details or refer to the Student Collection Notice.

Individuals may seek access to personal information held by the school by contacting the School's Privacy Officer. There may be occasions, however, when the Privacy Officer may refuse this access request. For example, where the release of the information would have an unreasonable effect on the privacy of others; where the release of the information may result in a breach of the school's duty of care to the student, or in the case of employees, access to the employee record. Sacré Cœur may require verification of your identity and for you to specify which information you require. The School may charge a reasonable fee for giving you access to personal information, but there is no charge for making a request or to correct personal information. If the information sought is extensive, the school will advise the likely cost in advance.

If the school refuses a request, the school will provide a written notice explaining the reasons for the refusal (unless, given the grounds for refusal, it would be unreasonable to provide reasons) and how to complain. Specific Collection Notices also set out how an individual may access or correct their personal information.

15. Mature Minors

In certain circumstances, principal of the school may assess a student as a “Mature Minor” in relation to their capacity to make decisions about consent, access or correction. When requested by a student, the principal may, at their discretion, grant a student access to information held by the school about them or allow a student to give or withhold consent to the use of their personal information, independently of their parents/caregivers. This would normally only occur when the maturity of the student and /or the student's personal circumstances warrant it.

16. National Consistent Collection of Data on Students with Disability

The school 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 school 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.

17. How does the School treat sensitive information?

In referring to 'sensitive information', the School means information relating to a person's:

- Racial, ethnic origin, political opinions, religion and/or philosophical beliefs
- Trade union/other professional or trade association membership
- Sexual orientation or practices
- Criminal record
- Health information or biometric information

Sensitive information will be used and disclosed only for the purpose for which it was provided, directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

18. Management and security of personal information

School staff, the School's service providers and contractors are required to protect personal and sensitive information that is under their control. Access to personal or sensitive information by staff is limited to that required by their role. Where personal data is required to be transmitted or stored in a location other than the School's main campus, this data will be accessed only via secure, encrypted channels and accessible only to authorised personnel. Physical records are stored in secure, locked files and all keys issued are recorded on the School's Key Register.

18.1 School publications

On occasions, information (including images or video) such as academic and sporting achievements, camps and excursions, other student activities and similar news is published in the School Newsletters, magazines, social media and on the School's Parent Portal. As part of the Business Terms, parents give their consent for student work, photographs and/or names to appear in publications. If parents wish to revoke this consent, they must advise the School of this change.

18.2 Google Drive / LMS

Google Drive is an online file storage system provided to the School. It is school policy that certain information is not stored in Google Drive. This includes, but is not limited to:

- Information about the wellbeing of students
- Medical information
- Financial information, including credit card or bank account details
- Board papers, including papers of Committees of the Board
- Usernames, passwords or other access information
- Information pertaining to legal matters

- Records of employment
- Student, staff or parent images

18.3 Auditing and review of access

The School's ICT Department may from time to time be required to audit or review access records or other metadata to ensure relevant compliance to the School's Privacy Policy. ICT staff should not be accessing any data unless requested by: Director of Business, Human Resources Manager, Head of Joigny and Deputy Principal: Head of Senior School and/or the Principal. The School monitors relevant cyber security and privacy threat intelligence and incorporates applicable guidance into its information security and privacy practices.

18.4 Third-party access

There may be circumstances where it is necessary for data held in the name of an individual such as email or files stored on network drives, hard drives or Google Drive, to be accessed by the Schools' ICT Department and when this is required, written authorisation is required from:

- Deputy Principal
- Head of Joigny (in the case of Joigny students)
- Director of Business or HR Manager (in the case of staff)
- Principal (in the case of members of the Leadership Team)
- Director of Risk and Compliance (incident management)

18.5 Closed Circuit Television

The School operates a number of closed-circuit television cameras to monitor and manage the physical security of our campus. These cameras are located at key locations, predominantly externally. Cameras are not located in classrooms, staff offices, toilets or change rooms or the School's sick bay. Notices of the presence of the camera system are located at each major entrance to the property. Cameras record 24 hours per day, 7 days per week and recordings are retained for a period of time to allow for the review of historical incidents as required. After a period of time has passed, the footage is automatically deleted. Live monitoring of some cameras also takes place and screens are located in various locations.

19. 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, the School will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The School will treat consent given by parents 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 the School about them or their child by contacting the School Principal or Admissions Manager by telephone or in writing. However, there may 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 student. There may be circumstances where the reason for refusal is not provided if doing so may breach the privacy of another person.

The School may, at its discretion, on the request of a student grant that student access to information held by the School about them, or allow a student 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 student and/or the student's personal circumstances warrant it.

20. Enquiries and complaints

If you would like further information about the way the School manages the personal information it holds about you, or wish to complain that you believe that the School has breached its privacy obligations, please contact the School Principal or the School Privacy Officer by writing reception@sac.vic.edu.au or telephone 9835 2700. The School will investigate your complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable. If you are not satisfied with the School's decision you may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are: GPO Box 5218, Sydney, NSW 2001 or Telephone: 1300 363 992 or website www.oaic.gov.au.

Appendix 1 - Collection Notice

1. The School collects personal information, including sensitive information about students and parents or caregivers and family members before and during the course of a student's enrolment at the School. 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 School, 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 School.
2. Some of the information the School collects is to satisfy the School's legal obligations, particularly to enable the School 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 School 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 School is not provided, this may affect the School's ability to enrol a student, respond to enquiries, provide the student with educational and support services or allow a person to visit the School.
6. The School 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:
 - School service providers which provide educational, support and health services to the School, (either at the School or off campus) including the Catholic Education Commission of Victoria Ltd (CECV), Catholic Education Offices, specialist visiting teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools
 - Third party service providers that provide online educational and assessment support services or applications (apps) * or services in relation to school improvement surveys, document and data management services, or applications to schools and school systems including Synergetic and Google's G Suite for Education, including Gmail and, where necessary, to support the training of selected staff in the use of 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. Other third parties which the school uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with Parents
 - Another school including to its teachers to facilitate the transfer of a student
 - Federal and State government departments and agencies
 - Health service providers
 - Recipients of School publications, such as newsletters and magazines
 - Student's parents or caregivers and their emergency contacts
 - Assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority
 - Anyone you authorise the School to disclose information to
 - Anyone who we are required or authorised to disclose the information to by law, including child protection laws
 - Suppliers of other information technology services for the purposes of facilitating access
 - Another school for the purpose of transferring schools which enables the next school to continue to provide education, support, health and wellbeing and/or fulfil legal requirements
 - NAPLAN results when students transfer schools or when required to evaluate a school's education program
 - Medical practitioners
 - If/when necessary to mitigate health, safety or wellbeing risks
 - When required by the law such as duty of care, anti-discrimination laws, OHS laws, reporting obligations, court orders or Victorian Police warrants
 - Investigate, report or prevent activities or incidents, misconduct, criminal offence, legal claims or on behalf of a law enforcement agency
 - School statistics, research or reporting requirements
 - Responding to complaints received from students, parents/caregivers, staff, contractors, volunteers or complaints received from the community
 - 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
7. The school 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 school 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 caregivers.
 9. The School 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 School 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 School uses Google's G Suite For Education, some personal information (usually limited to name and email address) about students, parents or caregivers 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 school entered into with Google.
 12. The School's Privacy Policy contains further information about its use of cloud and other third -party service providers and any of their overseas locations **OR** The countries in which the servers of cloud service providers and other third-party service providers may be located are:
 - Australia
 - United States of America
 - United Kingdom
 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. School personnel and the school'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 Synergetic system and ensuring its proper use.
 15. The School may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising.
 16. The School's Privacy Policy is accessible via the school website, newsletter, handbook, or from the School office. The policy sets out how parents, caregivers or students may seek access to, and correction of their personal information which the School 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 School'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 School's Privacy Policy also sets out how parents, caregivers, students and their family can make a complaint if they believe the School has interfered with their privacy.
 18. The School 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 School'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 School newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. The School will obtain permissions from the student's parent or guardian (and from the student if appropriate) prior to publication to enable the school 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 school 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 school unless the school is notified otherwise. Annually, the school will remind parents and caregivers to notify the school if they wish to vary the permissions previously provided. We may include student's and parents' or caregivers' contact details in a class list and School directory.
 20. If you provide the School 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 School and why, that they can request access to and correction of that information if they wish and to also refer them to the School's Privacy Policy for further details about such requests and how the School otherwise handles personal information it collects and complaints it receives.

NOTES:

* Consent 2 Go

** Google's G-Suite

*** Synergetic and Google's G-Suite