



## 1.0 Rationale

- 1.1 Santa Sabina College is bound by the Australian Privacy Principles contained in the *Privacy Act 1988 (cth)*. In relation to health records, the College is also bound by the Health Privacy Principles which are contained in the *Health Records and Information Privacy Act 2002 (NSW) (Health Records Act)*.
- 1.2 Santa Sabina College will, from time to time, review and update this Privacy Policy to take into account new laws and technology, changes to the College's operations and practices, and to make sure it remains appropriate to the changing College environment.
- 1.3 This Privacy Policy sets out how Santa Sabina College manages personal information provided to or collected by it.

## 2.0 Collection of Personal Information

- 2.1 The type of information Santa Sabina College collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:
  - students and parents/carers before, during and after the course of a student's enrolment at the College.
  - job applicants, staff members, volunteers and contractors.
  - other people who come into contact with the College, including name and contact details and any other information necessary for the particular contact with the College.
- 2.2 Personal Information provided: The College will generally collect personal information held about an individual by way of forms filled out by parents/carers or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents/carers and students provide personal information.
- 2.3 Personal Information provided by other people: In some circumstances the College 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 College.
- 2.4 Exception in relation to employee records: Under the Privacy Act and the Health Records Act, the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and the employee.

### **3.0 Use of Personal Information**

- 3.1 The College will use personal information it collects 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 has been consented.
- 3.2 Students and parents/carers: In relation to personal information of students and parents/guardians/families, the College's primary purpose of collection is to enable the College to provide schooling to students enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College. This includes satisfying the needs of parents/carers, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.
- 3.3 The purposes for which the College uses personal information of students and parents/carers include:
- to keep parents/carers informed about matters related to their child's schooling, through correspondence, newsletters such and magazines.
  - day-to-day administration of the College.
  - looking after students' educational, social and medical wellbeing.
  - seeking donations and marketing for the College.
  - pastoral and community events and networks.
  - to satisfy the College's legal obligations and allow the College to discharge its duty of care.
- 3.4 In some cases where the College requests personal information about a student or parent/carer, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity. Information collected may include:
- name, contact details (including next of kin), date of birth, gender, language background, previous school and religion.
  - parent/guardians/families' education, occupation and language background.
  - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors).
  - results of assignments, tests and examinations.
  - conduct and complaint records, or other behaviour notes, and College reports.
  - information about referrals to government welfare agencies.
  - counselling reports.
  - health fund details and Medicare number.
  - any court orders
  - volunteering information
  - photos and videos at College events
- 3.5 Job applicants and contractors: In relation to personal information of job applicants and contractors, the College's primary purpose of collection is to

assess and (if successful) to engage the applicant or contractor

The purposes for which the College uses personal information of job applicants and contractors include:

- administering the individual's employment or contract
- for insurance purposes
- seeking donations and marketing for the College
- satisfying the College's legal obligations, for example, in relation to child protection legislation

Information collected may include:

- name, contact details (including next of kin), date of birth, and religion
- information on job application
- professional development history
- salary and payment information, including superannuation details
- medical information (e.g. details of disability and/or allergies, and medical certificates); complaint records and investigation reports
- leave details
- photos and videos at College event
- workplace surveillance information including CCTV
- work emails and private emails (when using work email address) and Internet browsing history

- 3.6 Under the Health Records and Information Privacy Act 2002 (NSW), the Privacy Act and The Australian Privacy Principles do not apply to an employee record. As a result, these guidelines do not apply to the College's treatment of a staff record, where the treatment is directly related to a current or former employment relationship between the College and the staff member. The College handles health records in accordance with the Health Records and Privacy Act 2002 and the Privacy Principles.
- 3.7 Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as [alumni associations], to enable the College and the volunteers to work together.
- 3.8 Marketing and fundraising: Fundraising and marketing are important initiatives in the life of the College in order for the College to continue to provide students and staff with a quality learning environment. Parents/carers, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications like Veritas Voice and the flyers from the College may be used for marketing. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising activities, e.g. Ex-Students' Association, Foundation. The College reserves the right to publish to members of our community, and for the purposes of promoting the College, any photographs taken in the normal course of the College's operations unless a member of our community, has directed the College not to do so.

Parents/carers, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College

publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

#### **4.0 Disclosure of Personal Information**

- 4.1 The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:
- another school and teachers at those schools
  - government departments (including for policy and funding purposes)
  - medical practitioners
  - people providing educational, support and health services to the College, including specialist visiting teachers, sports coaches, volunteers, and counsellors
  - providers of specialist advisory services and assistance to the College, including in the area of Human Resources, child protection and students with additional need
  - providers of learning and assessment tools
  - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
  - agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes
  - people providing administrative and financial services to the College
  - recipients of College publications, such as newsletters and magazines
  - students' parents or guardians
  - anyone who authorises the College to disclose information to
  - anyone to whom we are required or authorised to disclose the information to by law, including child protection laws
- 4.2 Sending and storing information overseas: The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a College exchange. However, the College will not send personal information about an individual outside Australia without obtaining the consent of the individual or otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

#### **5.0 Sensitive Information**

- 5.1 At times the College collects or is provided with information that is termed “*sensitive*”. This information relates to a person’s racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or criminal record and health information and biometric information about an individual. Sensitive information will be used and disclosed only for the purpose for which it was provided or for a directly related secondary purpose, unless people agree otherwise or the use or disclosure of the sensitive information is allowed by law. In handling sensitive information the College also has regard for our duty of care and the pastoral needs of families in our community.

## **6.0 Management and security of personal information**

- 6.1 The College has in place steps to protect the personal information that the College holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage for paper records and passworded access rights to computerised records. In accord with the Australian Privacy Principles, the College does not store personal information longer than necessary. The College endeavours to ensure that the personal information it holds is accurate, complete and up to- date. Individuals wishing to update personal information held by the College can do so by contacting the College Principal at any time during College office hours. Student information is stored in accordance with legislative requirements.
- 6.2 The College may utilise Third Party providers to deliver online applications for students and staff. Consequently, details may be transferred, stored and processed in Australia or any other country utilised by these Third Party providers.

## **7.0 Access and correction of personal information**

- 7.1 Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. Students will generally be able to access and update their personal information through their parents/carers, but older students may seek access and correction themselves.
- 7.2 There are some exceptions to these rights set out in the applicable legislation.

## **8.0 Updating Information**

- 8.1 To make a request to access or to update any personal information the College holds, please contact the Executive Assistant to the College Principal in writing. The College may require verification of identity and specify what information is required.
- 8.2 The College may charge a fee to cover the cost of verifying an application and locating, retrieving, reviewing and copying any material requested. If the information is extensive, the College will advise the likely cost in advance.
- 8.3 If the College cannot provide access to information, we will provide written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons).

## **9.0 Consent and rights of access to the personal information of students**

- 9.1 The College respects every parent/carer's right to make decisions concerning their child's education.
- 9.2 Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. The College will treat consent given by parent/carers as consent given on behalf of the student, and notice to parent/carers will act as notice given to the student.

- 9.3 Parent/carers may seek access to personal information held by the College about them or their child by contacting the College Principal 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 College's duty of care to the student.
- 9.4 The College may, at its discretion, on the request of a student grant that student access to information held by the College about them or allow a student to give or withhold consent to the use of their personal information, independently of their parent/carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

## **10.0 Use of CCTV Footage**

- 10.1 Consistent with the College's obligations set out above, Santa Sabina College may use CCTV cameras to prevent and verify incidents involving:
- criminal behaviour – of anyone on College grounds (including damage to College buildings and property)
  - the health & wellbeing of a College or community member who has been harmed or put at risk
  - other inappropriate behaviour
- 10.2 When the College uses CCTV footage to verify an incident in any of the ways set out above, that footage then constitutes a 'record'. CCTV cameras are not used to monitor the quality of teaching. CCTV cameras are not used in toilets, showers and change rooms or staff rooms.

### **10.3 Access to CCTV Footage**

CCTV footage is only accessed for the purposes as set out above and only by the following staff:

- Principal (any other authorised people e.g. members of the College Leadership Team, College IT Department, Security Personnel – accompanied by the Principal).
- any other people permitted by law
- personal information contained on the recordings shall not be used or disclosed for purposes other than those for which it is collected, except with the consent of the individual or as required by law.

### **10.4 Managing and Securing the CCTV System**

The Principal (or delegate) is responsible for managing and securing the CCTV system including:

- operation of the CCTV system and ensuring it complies with this policy.
- considering the appropriate location and use of cameras and method for storing CCTV footage.
- maintaining and upgrading cameras when required.

### 10.5 Storage of Footage

- CCTV footage is kept for up to a month on a designated server. If the College has not used CCTV footage, and there has been no request to view or access footage during this period, the footage is deleted.

### 11.0 Enquiries and complaints

For further information about the way the College manages the personal information it holds, or to make a complaint if it is believed that the College has breached the Australian Privacy Principles please contact the Privacy Officer (Director of People and Culture) in writing to 90 The Boulevard, Strathfield NSW 2135 or by telephoning 02 9745 7000. The College will investigate any complaint and will notify the complainant of the making of a decision in relation to a complaint as soon as it is practicable after it has been made.

### 12.0 Approval and Review

<b>Authorised by:</b> College Principal
<b>Authorisation date:</b> May 2022
<b>Policy implementation date:</b> May 2022
<b>Version:</b> 2
<b>Policy Identifier:</b> 200.2
<b>Policy rescinded/replaced:</b> 88.05 Privacy Guidelines
<b>Review Date:</b> May 2024 or earlier as determined by the Principal
<b>Notes:</b>