



PRIVACY POLICY

Policy Statement

This policy outlines how St Paul's College will use and manage personal information and your rights in relation provided to your personal information, including how to complain and how we deal with complaints.

The policy observes the Australian Privacy Principles contained in the Acts indicated in the table below.

St Paul's College is committed to managing personal information in an open and transparent way and will take all reasonable steps under the circumstances to implement practices, procedures and systems relating to its functions or activities that:

- will ensure compliance with the [Australian Privacy Principles](#);
- and will enable the College to deal with inquiries or complaints about compliance with the Australian privacy principles

The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing College environment. The current version of this Privacy Policy is published on our website.

Information sharing regimes under state/territory legislation relating to child protection override the privacy requirements under the Privacy Act.

Rationale

This Privacy Policy sets out how the College manages personal information provided to or collected by it.

Responsibilities/Relationships

Related Policies and Procedures	Student Health Policy Enrolment Policy Recruitment Policy
Legislation	Commonwealth Privacy (Private Sector) Act 1988 Privacy Amendment (Enhancing Privacy Protection) Act 2012 Privacy Amendment (Notifiable Data Breaches) Act 2017 Health Records and Information Privacy Act 2002 (NSW)
Key Relationships/People	Executive Team and Manager, Executive Services

Principles and Procedures

The College is bound by the Australian Privacy Principles.

Australian privacy principles

- APP1: Open and transparent management of personal information
- APP2: Anonymity and pseudonymity
- APP3: Collection of solicited personal information
- APP4: Dealing with unsolicited personal information
- APP5: Notification of the collection of personal information
- APP6: Use or disclosure of personal information
- APP7: Direct marketing
- APP8: Cross-border disclosure of personal information
- APP9: Adoption, use or disclosure of government related identifiers
- APP10: Quality of personal information
- APP11: Security of personal information
- APP12: Access to personal information
- APP13: Correction of personal information

What kinds of personal information does the College collect and how does the College collect it?

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

- students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the College, including:
 - name, contact details (including next of kin), date of birth, gender, language background, previous College and religion;
 - parents' 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, test 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; and
 - photos and videos at College events;
- job applicants, staff members, volunteers and contractors, including:
 - 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 events;
- workplace surveillance information;
- work emails and private emails (when using work email address) and Internet browsing history; and
- 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.

How we collect personal information

Personal Information you provide:

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

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. If a student transfers to a new College, the new College may collect personal information about the student from the student's previous College to facilitate the transfer of the student.

Personal information from other sources

We may also collect personal information through surveillance activities (such as CCTV security cameras) and Cyber monitoring programs.

Purposes for which we collect, use and disclose personal information.

The purposes for which the College collects, uses and discloses personal information depend on our relationship with you and include the following:

Students and Parents:

- providing Collegeing and College activities;
- satisfying the needs of Parents, the needs of students and the needs of the College
- throughout the whole period a student is enrolled at the College;
- making required reports to government authorities;
- keeping Parents informed about matters related to their child's Collegeing, through correspondence, apps, newsletters and magazines;
- day-to-day administration of the College;
- looking after students' educational, social and health wellbeing;
- seeking donations for the College (see the 'Fundraising' section of this Privacy Policy); and
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

Job applicants and contractors:

- assessing and (if successful) engaging the applicant or contractor;
- administering the individual's employment or contract,
- for insurance purposes;
- seeking donations and marketing for the College; and

- satisfying the College's legal obligations, for example, in relation to child protection legislation.

Volunteers:

- to contact you about, and administer, the volunteer position;
- for insurance purposes; and
- satisfying the college's legal obligations, for example, in relation to child protection legislation

Who might the College disclose personal information to and store your information with?

The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- other Colleges and teachers at those Colleges, including a new College to which a student transfers to facilitate the transfer of the student;
- 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 needs and for the purpose of administering Microsoft 365 and ensuring its proper use
- 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);
- people providing administrative and financial services to the College;
- the provider of information management and storage system and other information technology services
- recipients of College publications, such as newsletters and magazines;
- students' parents or guardians;
- anyone you authorise the College to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

How we store personal information

We store your personal information in hard copy and electronically. We use information management and storage systems provided by third party service providers. Personal information is stored with and accessible by the third-party service providers for the purpose of providing services to the College in connection with the systems.

The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information. See further the section below 'Sending and storing information overseas.'

Sending and storing information overseas:

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a College exchange.

The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Microsoft. Microsoft 365, including Outlook, stores and processes limited personal information for this purpose. College personnel 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 Microsoft 365 and ensuring its proper use.

Marketing and fundraising:

The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the College's Foundation or alumni organisation or, on occasions, external fundraising organisations.

Parents, 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.

If you do not want to receive fundraising communications from us, please contact the Manager Executive Services.

Security of personal information

The College has in place steps to protect the personal information the College holds from misuse, interference and loss, unauthorised access, modification, or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

- Restricting access to information on the College databases on a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable storage. Access to these records is restricted to staff on a need-to-know basis.
- Implementing physical security measures around the College buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies, and procedures, designed to protect personal information storage on our computer networks.
- Implementing human resources policies and procedures, such as email and internet usage, confidentiality, and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as

practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Access and correction of personal information

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, but older students 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 to update any personal information the College holds about you or your child, please contact the College Principal or Manager Executive Services by telephone or in writing. The College may require you to verify your identity and specify what information you require. The College 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 College 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 students

The College respects every Parent's right to make decisions concerning their child's education.

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 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 College about them or their child by contacting the College Principal or Manager, Executive Services 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 College's duty of care to the student.

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 Parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

How does the College treat sensitive information?

In referring to 'sensitive information', the College means: information relating 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 practices or criminal record, that is also personal information; 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 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

The College's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

The College has in place steps to protect the personal information the College holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

Notifiable data breaches

Under APP 11 (security of information), Colleges are required to take reasonable measures to protect information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. The Notifiable Data Breach Scheme will require Colleges to notify the Office of the Australian Information Commissioner (OAIC) and the affected individual(s), in the event of a notifiable data breach.

A data breach occurs when personal information is lost or subject to unauthorised access, modification, disclosure, or other misuse or interference.

Pursuant to section 26WE of the Privacy Amendment (Notifiable Data Breaches) Act 2017, an eligible data breach, which would require notification, occurs in circumstances where:

- There is an unauthorised access or unauthorised disclosure of information and a reasonable person would conclude that access or disclosure would be likely to result in serious harm to any of the individuals to whom the information relates; or
- Information is lost in circumstances where such unauthorised access or disclosure is likely to occur and a reasonable person would conclude that, assuming such access or disclosure did occur, it would be likely to result in serious harm to any individuals to whom that information relates.

Where such breach occurs, the College undertakes to prepare a statement in accordance with the Privacy Amendment (Notifiable Data Breaches) Act 2017 and notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as soon as practicable after the College becomes aware of the eligible data breach except where exempted under the Act.

Online payments and financial details

Identifiable information collected through online payment will be used only for the purpose of processing that individual payment transaction. Non-identifying information may be used for statistical, reporting and research purposes.

The College may store parent credit card or bank account details for the purposes of fee payment for the duration of a student's enrolment at the College. The College may also store bank account details for the purposes of salary payment for the duration of a staff member's employment at the College.

Enquiries and complaints

If you would like further information about the way the College manages the personal information it holds, or wish to complain that you believe that the College has breached the Australian Privacy Principles please contact the Principal by writing or telephone at principal@stpaulscollege.nsw.edu.au / 0260 292 200. The College 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.

This policy was approved by the College Board on:

This Policy will be reviewed annually