



PRIVACY POLICY

Introduction

St Columba's College (the College) is a Mary Aikenhead Ministries College in the tradition of the Sisters of Charity. We are called to develop in each member of our community a contemporary understanding and application of the charism of Venerable Mary Aikenhead and the spirituality of the Sisters of Charity, and the Mary Aikenhead Ministries' mission, vision and values of justice, love, compassion and hope.

Purpose and Objectives

This policy sets out how personal information provided to or collected by St Columba's College (the College) is managed and protected, to ensure St Columba's College acts in accordance with the Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles (APPs).

In addition to these, we also comply with the requirements of relevant state-based legislation, including the Health Records Act.

St Columba's College will apply a number of principles in collecting and managing personal information. It will:

- manage personal information in an open and transparent way
- only collect personal information that is reasonably necessary for the College's functions or activities
- use fair and lawful means to collect personal information
- obtain consent to collect sensitive information unless specified exemptions apply
- take reasonable steps to protect the personal information the College holds from misuse, interference and loss, and from unauthorised access, modification or disclosure
- only use or disclose personal information for the primary purpose* of collection unless an exception applies.

*Primary purpose – delivery of education and wellbeing programs at the College.

Scope

This policy applies to information held and acquired by St Columba's College.

Policy

The College collects and holds personal information, including health and other sensitive information about students, parents/carers and others, who come into contact with the College.

The College will generally collect personal information held about an individual by way of:

- forms filled out by parents/carers, students or others
- face-to-face meetings and interviews

- emails and telephone calls
- through the College's online portals eg Funnel, Consent2Go, SEQTA.

St Columba's 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 consented to, by the persons from whom the information is collected.

St Columba's College ensures that personal information is stored securely and that access is provided only to persons who need such access. Depending on the nature of the personal information, it may be stored in locked rooms or cabinets (in the case of paper records), on secure digital devices, College computer systems and cloud services, with appropriate levels of access in place.

Exception 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 College's treatment of an employee record where the treatment is directly related to a current or former employment relationship between the College and employee. The College handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001 (Vic.)*.

Anonymity

The College 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 College may be done anonymously, where practicable, which may include making an inquiry, complaint or providing feedback.

Procedures

What Information May be Collected by the College?

Student Information
Name
Contact details (including next of kin)
Date of birth
Gender
Language background
Previous school
Religion
Medical and welfare information (including details of disability and/or allergies and details of any assistance the student receives for that disability and/or allergies, medical reports)
Cognitive assessments
Conduct and complaint records, or other behaviour notes, school attendance, school reports
Information about referrals to government welfare agencies
Information obtained during counselling
Any court orders
Permission to take photographs and videos at College events and use them in College publications

Parent/Carer Information
Name
Address
Contact details
Education, occupation and language background
Bank account or credit card details
Health fund details
Medicare number
Any court orders
Volunteer information (including Working with Children Check)

Job Applicants, Staff Members, Volunteers and Contractors
Name
Contact details (including next of kin)
Date of birth
Information on job application form
Information provided by a former employer or a referee
Professional development history
Salary and payment information, including superannuation details
Medical information (eg details of disability and/or allergies, medical certificates)
Complaint records and investigation report
Employee records
Photos and videos at school events
Workplace surveillance information
Work email and private email (using work email address) and internet browsing history
Volunteer information (including Working with Children Check)
Victorian Institute of Teaching Registration details

Other People Who Come into Contact with the College (eg Alumnae, Donors)
Name
Contact details
Other information necessary for the particular contact

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

- academic records and/or achievement levels
- information that may be relevant to assisting the new school to meet the needs of the student, including any adjustments.
- information shared under the Child Information Sharing Scheme.

How will the College Collect and Hold Personal Information?

Students and Parents/Carers

In some cases where the school 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.

In relation to the personal information of students and parents/carers, the College's primary purpose of collection is to enable the College to provide schooling to students enrolled at the College (including educational and support services for the student), 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.

In particular, the purposes for which the College uses the personal information of students and parents/carers include:

- to keep parents/carers informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- day-to-day administration of the College
- looking after students' educational, social and medical wellbeing
- seeking donations and marketing for the College
- to satisfy the College's legal obligations to discharge its duty of care
- to satisfy the legal obligations of the College's governing authorities – St Columba's College Board, Mary Aikenhead Education Australia (MAEA) and the Victorian Catholic Education Authority (VCEA)
- to satisfy the College service providers' legal obligations.

Job Applicants and Contractors

In relation to the personal information of job applicants and contractors, the College's primary purpose of collection is to assess and (if successful) engage the applicant, or contractor, as the case may be.

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

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

Volunteers

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as the Parent Engagement Committee.

The purposes for which the College uses the personal information of volunteers includes:

- enabling the College to manage the engagement process of volunteers
- for insurance purposes
- satisfying the College's legal obligations, for example, in relation to child protection
- to confirm their suitability and to manage their visits.

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, on occasion, external fundraising organisations.

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 and sometimes people's images, may be used for marketing purposes.

Who Might the College Disclose Personal Information To?

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

- College service providers which provide educational, support and health services to the College, either at the College or off campus
- people providing educational support such as sports coaches, volunteers, counsellors and providers of learning and assessment tools
- third party service providers that provide online educational and assessment support services, document and data management services, training and support services, hosting services, and software-as-a-service applications, such as SEQTA and Google Workspace
- authorised agencies and organisations to enable the College to discharge its responsibilities, eg under the Australian Education Regulation 2013 (Regulation) and the Australian Education Act 2013 (Cth) relating to students with a disability, including Nationally Consistent Collection of Data (NCCD) quality assurance processes, participation in the Australian Early Development Census (AEDC) and government audits
- authorised organisations and persons who support the College by providing consultative services or undertaking assessments for the purpose of educational programming or providers of health services such as counsellors, psychologists, school nursing services, dental vans. Specific consent is obtained to collect and disclose this type of sensitive and health information as part of a service request which may include release of relevant medical or allied health reports, educational planning and evaluation documents such as personalised learning/behaviour/medical management plans
- other third parties which the College uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with parents/carers
- support the training of selected staff in the use of the College's systems
- another school including to its teachers to facilitate the transfer of a student
- federal and state government departments and/or agencies engaged by them
- health service providers
- recipients of College publications, such as newsletters and magazines
- students/parents/carers and their emergency contacts
- assessment and educational authorities including the Victorian Curriculum and Assessment Authority (VCAA) and the Australian Curriculum, Assessment and Reporting Authority (ACARA)
- anyone to whom the College is authorised, by the parent/carer of a student or by the person from whom the information was collected, to disclose information
- anyone to whom the College is required or authorised to disclose the information by law, including under child protection and information sharing laws.

Nationally Consistent Collection of Data on School Students with Disability

The College is required by the Australian Education Regulation 2013 (Cth) and *Australian Education Act 2013* (Cth) to collect and disclose certain information to inform the Students with a Disability (SwD) loading via the NCCD. The College provides the required information at an individual student level to 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.

Sending and Storing Information Overseas

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or a student overseas tour. However, the College will not send personal information about an individual outside Australia without either:

- obtaining the consent of the individual
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The College uses online service providers (including for the delivery of services and third-party online applications, or apps relating to email, instant messaging and education and assessment, such as Google Workspace and Gmail) which may be accessible by the parent/carer. Some personal information, including sensitive information, may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.

College personnel and the College's service providers may have the ability to access, monitor, use or disclose emails, communications (eg instant messaging), documents and associated administrative data for the purposes of administering the system and services ensuring their proper use.

The College makes reasonable efforts to be satisfied about the security 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 the cloud is located in countries with substantially similar protections as the Australian Privacy Principles.

Where personal and sensitive information is retained by a cloud service provider on behalf of the College to facilitate human resources and staff administrative support, this information may be stored on servers located in or outside of Australia

The countries in which the servers of cloud service providers and other third-party service providers are located may include:

- United States of America
- Europe.

Otherwise, it is not practicable to specify in this policy the countries in which overseas recipients of personal information are likely to be located.

How Does the School 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 the student's parent/carer or the person from whom the information was collected agrees 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 personal information and the privacy of individuals.

The College takes all reasonable 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 appropriate security to limit access to digital records (see the Cybersecurity Policy).

This includes responding to any incidents which may affect the security of the personal information it holds. If the College assesses that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, we will notify them and the Office of the Australian Information Commissioner of the breach.

Access and Correction of Personal Information

Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information and health records respectively 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.

There are some exceptions to the access rights set out in the applicable legislation.

To make a request to access or to update any personal information the College holds, please contact the College Principal, Rita Grima, by telephone or in writing. The College may require verification of identity and specification of what information is required. The College may charge a fee to cover the cost of verifying the 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 the College cannot provide access to that information, we will provide written notice explaining the reasons for refusal.

There may be circumstances where the reason for refusal is not provided, if doing so may breach the privacy of another person.

Consent and Rights of Access to the Personal Information of Students

The College respects every parent/carer's right to make decisions concerning their child's personal information.

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/carers. The College will treat consent given by parents/carers as consent given on behalf of the student and notice to parents/carers will act as notice given to the student.

Parents/carers may seek access to personal information held by the College about them or their child by contacting the College Principal, Rita Grima, 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/carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Complaints

If parents/carers wish to complain that the College has interfered with their privacy because of an alleged breach of the Australian Privacy Principles, they should contact the College Privacy Officer (see Appendix One for Privacy Officer role description) in writing via privacy@columba.vic.edu.au or:

Privacy Officer
St Columba's College
P O Box 1103
MOONEE PONDS VIC 3039

The College will investigate the complaint (usually no longer than 30 days) and will notify the parent/carer of the making of a decision in relation to the complaint as soon as is practicable after it has been made.

If the parents/carers are not satisfied with the College's decision, a complaint in relation to an alleged breach of the Australian Privacy Principles can be made to the Office of the Australian Information Commissioner via their online [form](#) or in writing to:

Office of the Australian Information Commissioner
GPO Box 5288
SYDNEY NSW 2001

Source of Obligation

- Australian Education Act 2013 (Cth)
- Australian Education Regulations 2023 (Cth)
- Health Records Act 2001 (Vic.)
- Privacy Act 2001 (Cth)

Related Policies and Procedures

- St Columba's College - [Enrolment Policy](#)
- St Columba's College - [Complaints Policy](#)
- St Columba's College - [General Records Management Policy](#)
- St Columba's College – Cybersecurity Policy (awaiting approval)
- [Melbourne Archdiocese Catholic Schools Privacy Policy](#)

Related Forms and Documents

- St Columba's College Standard Collection Notice
- St Columba's College Photographic and Recording Permission Online Form

POLICY HISTORY AND SCHEDULE

Date of Approval:	September 2024
Approval Authority:	College Board
Delegated Contact Person:	Principal
Next Review Date:	September 2025

Appendix One

Privacy Officer Role Description

OVERVIEW

Staff at St Columba's College are called to be co-workers in the ecclesial mission of witnessing and proclaiming God's reign.

All staff members of St Columba's College are expected to support Catholic education in the spirit of Mary Aikenhead as expressed in the College's Vision and Mission statements.

Each staff member's role is designed to contribute to the best possible educational outcomes for all students, enhance the community's strengths and ensure careful stewardship of the College's resources.

COMMITMENT TO CHILD SAFETY

St Columba's College is a child safe environment. Our College actively promotes the safety and wellbeing of all students, and all College staff are committed to protecting students from abuse or harm, in accordance with their legal obligations including Child Safe Standards. Every staff member will have a demonstrated understanding of the College's Child Safety Code of Conduct. In addition, all employees will have the following qualities and capabilities:

- experience working with children
- a demonstrated understanding of child safety
- a demonstrated understanding of appropriate behaviours when engaging with children
- familiarity with legal obligations relating to child safety (eg mandatory reporting)
- be a suitable person to engage in child-related work.

PRIMARY OBJECTIVE OF THE ROLE

St Columba's College is required to comply with the Privacy Act which incorporates the 13 Australian Privacy Principles (APPs). The Privacy Act and the APPs impose substantial privacy obligations on the College, meaning that compliance requires more than a privacy policy published on a public website.

The APPs set out the standards, rights and obligations for the College in relation to collecting, storing, using, accessing and correcting personal information.

In Victoria, the Health Records Act 2001 (Vic) (Health Records Act) also applies to schools that collect, hold, use or disclose a person's health information. St Columba's College is required to comply with both the Health Records Act for information it holds on health matters, and the Privacy Act for other personal information (including sensitive information and health information).

MAJOR AREA OF RESPONSIBILITY

The Privacy Officer is the first point of contact for advice on privacy matters related to the College.

STATEMENT OF DUTIES

The Privacy Officer is responsible for:

- | | |
|---------|---|
| Privacy | <ul style="list-style-type: none">• promoting a culture where the personal information of individuals is protected in accordance with our obligations under the Privacy Act |
|---------|---|

	<ul style="list-style-type: none"> ● integrating privacy obligations into existing practices and procedures and policy documents ● providing or organising ongoing training support for managers to ensure that all relevant persons receive privacy training ● managing privacy queries and complaints ● in association with a Data Breach Response Team (see below), managing and assessing, and coordinating responses to, data breaches ● liaising with regulators (where necessary) ● monitoring privacy compliance performance ● analysing performance to identify the need for corrective action ● ensuring privacy issues are factored into contracts with external suppliers ● ensuring our Privacy Program and Privacy Policy are reviewed on a regular basis ● ensuring Personal Information Audits are conducted on a regular basis to determine how the College collects, uses and discloses personal information.
Data Breaches	<p>The Privacy Officer must be notified of any data breach.</p> <p>Our Privacy Officer will be responsible for notifying the OAIC in the event of a data breach.</p> <p>For more information, refer to our Procedures for Responding to and Reporting Data Breaches.</p> <p>OAIC Contact Details:</p> <p>If we decide to notify the OAIC, we will do so using one of the following contact options:</p> <ul style="list-style-type: none"> ● Online Form ● Telephone: 1300 363 992 ● Facsimile: +61 2 6123 5145 ● Post: GPO Box 5288, Sydney NSW 2001 <p>In the event of a Notifiable Data Breach, the Privacy Officer will establish a Data Breach Response Team (DBRT). The DBRT is responsible for assisting the Privacy Officer in investigating the breach and notifying the OAIC, when required.</p> <p>The DBRT members will include representatives from the Leadership Team, the College’s technology team and other departments as needed.</p> <p>Depending on the nature of the breach, the composition of the DBRT may vary. For example, the College is alerted to the incident through a complaint, the Complaints Handling Manager would form part of the Team.</p>
Other	<p>The Privacy Officer will, at times, be required to undertake other duties related to the role as directed by the Principal.</p>
<p>RISK AND OCCUPATIONAL HEALTH AND SAFETY</p> <p>The Privacy Officer will:</p> <ul style="list-style-type: none"> ● comply with legislated occupational health and safety practices and participate in consultative processes ● observe safe work practices in accordance with training and instruction given ● identify, report and, where appropriate, action risks/hazards in order to eliminate or mitigate against the risk recurring (risks arising in the workplace may be financial, site, task or person specific or related to safety) 	

<ul style="list-style-type: none"> • promote and implement occupational health and safety, and risk mitigation processes within and across this area of responsibility. 	
<p>Team Membership</p>	<p>Occupational Health and Safety Committee St Columba's College Board Governance and Policy Committee Cyber Security Committee Other Committees as required</p>