



Privacy Policy and Data Protection

Document Control

Document Details

Document Name	Privacy Policy and Data Protection
Document created by	Deputy Principal ICT Manager Risk and Compliance Manager
Document Approval	Leadership Team

Document Management

Relevant to	All staff, volunteers, contractors, all parents/guardians
Related documents	Privacy Breach Policy and Response Protocol Remotely Piloted Aircraft Policy ICT Policy
Related Legislation	Privacy Act 1988 (Cth) Australian Privacy Principles Notifiable Data Breach Scheme
Review	The Policy shall be reviewed every 1 - 3 years or as required (in the event of any information or incident that would warrant a review including any legislative or organisational change)

Change History

Author	Date	Description	Version
W Ross	<<insert>>	Original Privacy Policy created, reviewed and approved	V1
B Carmichael	19/2/2018	Original document created from previous Privacy Policy	V2
B Carmichael N Visic	27/2/2018	Reviewed by Risk and Compliance Manager and changes updated	V2
B Carmichael N Visic	8/2/2018	Reviewed by Leadership and approved subject to minor edits	V2
W Ross	9/2/2018	Minor edits suggested by Leadership made	V3



Privacy Policy and Data Protection

All policies at Sacré Cœur are written in keeping with the Goals of Sacred Heart Education.

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

1. Purpose

This policy describes Sacre Coeur's (the School) process when using and managing personal information, health information or sensitive information that is either provided or collected by the School. Examples of these include:

- Personal information: name, address, phone number, date of birth (age) and so on
- Health information: person's health status, medical history, immunisation status, allergies or counselling records.
- Sensitive information: person's racial or ethnic origin, political opinions or affiliations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practises, criminal record and can include health information.

2. 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:

- Students and parents and/or guardians (described as 'parents' throughout this document) before, during and after the course of a student's enrolment at the School
- The personal information of Job applicants, staff members, volunteers, visitors and contractors
- Other people who may come into contact with the School
- 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

3. How do we collect this information?

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 or telephone calls
- Invoices
- 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.

3.1 Collection notices

We aim to take reasonable steps to advise you of our collection notice when the School collects information about you such as:

- Type of personal information collected
- Purpose of the collection
- How to access the information
- Internal or external parties who may have access to the information
- Law that requires the particular information to be collected

Refer to Appendix 1 for more information about our Collection Notice.

3.2 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.

4. Why do we collect this information?

The primary purpose we collect information includes (but is not limited to):

- Educate students
- Support students social and emotional wellbeing and health
- Fulfil legal requirements for example:
 - Duty of care and taking reasonable steps to reduce risk of harm to students, staff, parents or visitors
 - Make reasonable adjustments for anti-discrimination laws by providing support to students with disabilities
 - Provide a safe and secure workplace
- Enable the School to communicate with parents about student's schooling and maintain a good order and management of our school
- Ensure effective management, resourcing, administration, statutory duties, plan, fund, monitor, regulate and evaluate policies, services and processes, comply with reporting, investigate incidents and respond to any legal claims

4.1 Primary purpose of collecting information about others

The School collects information about staff, volunteers and job applicants to/for:

- Assess applicants suitability for employment or volunteering
- Administer employment or volunteer placement
- Public liability, WorkCover insurance purposes
- Employment and contractual obligations, OHS laws and/or when required to investigate incidents
- Legal claim responses

4.2 Students and parents

In relation to personal information of students and parents, the School's primary purpose of collection is to enable us to provide educational and support services for students. This

includes satisfying the needs of parents, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School.

The purposes for which the School uses personal information of students and parents include:

- To deliver a high quality, relevant and contemporary educational experience
- To keep parents informed about matters related to their daughter's schooling, through correspondence, newsletters and magazines
- Day-to-day administration
- Looking after students' educational, social and medical wellbeing
- Seeking donations and marketing for the School
- Managing the physical and electronic security of the School
- Satisfy the School's legal obligations and allow Sacré Cœur to discharge its duty of care

In some cases where Sacré Cœur requests personal information about a student or parent, 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.

4.2 Job applicants and contractors

The primary purpose of collecting personal information for job applicants and/or contractors is to assess and (if successful) to engage the applicant or contractor. The purposes for which the School uses personal information of job applicants and contractors includes:

- Administering the individual's employment or contract
- Insurance purposes
- Seeking donations and marketing for the School
- Satisfy the School's legal obligations, for example in relation to child protection legislation

4.3 Volunteers

Sacré Cœur also obtains personal information about volunteers who assist the School in its functions or conduct associated activities, such as the Sacré Cœur Foundation, Parents' Association, Past Parents' Association and Alumnae Association, to enable the School and the volunteers to work together.

4.4 Marketing and fundraising

Sacré Cœur 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, for example, the Sacré Cœur Foundation, Parents' Association, Past Parents' Association or Alumnae Association. Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

4.5 Anonymity

The School needs to collect identifiable information to facilitate the delivery of educational and support services, the job application process and fulfil other obligations and processes. However, some activities and interactions with the School may be done anonymously where practicable, which may include making an enquiry, complaint or providing feedback.

5. When do we use or disclose information you have provided?

The School uses or discloses information that complies with the Victorian Privacy Laws. We may disclose personal information, including sensitive information to parties such as:

- School service providers, including the Catholic Education Commission of Victoria (CECV), Catholic Education Office specialist visiting teachers, counsellors and sports coaches, and other diocesan staff
- Third party service providers that provide educational support services to schools and school systems such as the Integrated Catholic Online Network system (ICON)
- 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 schools education program
- Government departments
- Medical practitioners
- Recipients of school publications, for example newsletters and magazines
- Students' parents or guardians
- Anyone you authorise the School to disclose information to
- Anyone to whom we are legally are required to disclose the information by law
- 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/guardians, 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

6. Storing and Securing Information

The School takes reasonable steps to protect information from misuse and loss and from unauthorised access, modification and disclosure. We store 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.

6.1 Sending and storing information overseas

We may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange, however the School will not send personal information about an individual outside Australia without:

- Obtaining the consent of the individual where required; or
- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

6.2 Cloud Services

Sacré Cœur, from time to time, will engage with external providers to implement technology services that are not hosted on servers owned by the School (broadly, cloud services). Before

implementing these services, Sacré Cœur will ensure that wherever practicable, data is stored on servers only located within Australia and appropriate privacy and security protections are in place.

6.3 Accessing information

All individuals or their authorised representative/s have a right to access, update and correct information that we hold about them specifically. Students will generally have access to their personal information through their parents, but older students may seek access themselves.

There are some exceptions to this right set out in the applicable legislation. To make a request to access any information we hold about you or your child, please contact the Principal in writing. The School may require you to verify your identity and specify what information you require. The School 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 School 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.

However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the student, or where students have provided information in confidence

6.4 Consent and rights of access to the personal information of students

Sacré Cœur 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 Sacré Cœur about them or their child by contacting the Privacy Officer. However, there will 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.

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 so warranted.

7. Management and security of personal information

School staff, our service providers and contractors are required to protect personal and sensitive information 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 Key Register.

7.1 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 School newsletters and magazines and on our parent portal. As part of the Business Terms, parents give their consent for student work and photos to appear in publications. If the parent wishes to revoke this consent, they must write to the School.

7.2 Google Drive / Firefly

Google Drive is an online file storage system provided to Sacré Cœur as part of the Google Apps for Education (GAPE) suite.

It is the policy of Sacré Cœur 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

7.3 Auditing and review of access

Sacré Cœur's Tech Centre staff may, from time to time, be required to audit or review access records or other metadata for the purposes described earlier in this policy. The ICT Manager, Business Manager, Deputy Principal and Principal are the only staff permitted to authorise audits to take place.

7.4 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 Tech Centre staff for purposes other than the provision of support.

When this is required, written authorisation from:

- Director of Students 7-12 (in the case of secondary students)
- Head of Joigny (in the case of Joigny students)
- Business Manager or Deputy Principal (in the case of staff)
- Principal (in the case of members of the Leadership Team)

Shall be sought prior to access being granted.

7.5 Closed Circuit Television

Sacré Cœur 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 the following areas:

- Classrooms
- Offices of individual staff members
- Toilets
- Changing Rooms
- Medical facilities

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

up to six weeks to allow for the review of historical incidents as required. After six weeks, the footage is automatically deleted. Live monitoring of some cameras also takes place and screens are located in various locations to facilitate this.

8. Data Breaches

Sacré Cœur takes all data breaches such as unauthorised access, disclosure or loss of information extremely seriously.

All data breaches will be investigated thoroughly by the School's Response Team.

Data breaches that result in 'serious harm' to an individual such as physical, psychological, emotional, financial or reputational harm will be reported to the Office of the Australian Commissioner (Notifiable Data Breach Scheme effective 22nd February 2018).

9. Enquiries and complaints

If you would like further information about the way Sacré Cœur manages the personal information it holds, or wish to complain that you believe the School has breached the Australian Privacy Principles, please contact the Privacy Officer at Sacré Cœur, 172 Burke Road, Glen Iris Vic 3146 or by telephone at 03 9835 2700. The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as practicable after it has been made.

APPENDIX 1 – STANDARD COLLECTION NOTICE

1. Sacré Cœur collects personal information, including sensitive information about students, parents/guardians, job applicants, staff members, volunteers, visitors, contractors or third parties.
 - a) Students and parents/guardians before, during and after the course of a student's enrolment at the School
 - b) Job applicants, staff members, volunteers, visitors and contractors personal information
 - c) Other people who may come into contact with the School or 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 primary purpose of collecting this information is to enable the School and the Catholic Education Commission of Victoria (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 we collect 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 is sensitive information within the terms of the Australian Privacy Principles (APPs) under the *Privacy Act 1988 (Cwth)*. We may ask you to provide medical reports about your daughter/s from time to time.
5. The School may disclose personal and sensitive information for administrative, educational and support purposes. This may include:
 - School service providers, including the Catholic Education Commission of Victoria (CECV), Catholic Education Office specialist visiting teachers, counsellors and sports coaches, and other diocesan personnel
 - Third party service providers that provide educational support services to schools and school systems such as the Integrated Catholic Online Network system (ICON)
 - 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 schools education program
 - Government departments
 - Medical practitioners
 - Recipients of school publications, for example newsletters and magazines
 - Students' parents or guardians
 - Anyone you authorise the School to disclose information to
 - Anyone to whom we are legally are required to disclose the information by law
 - 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/guardians, 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
6. Where personal and sensitive information is retained by the CECV by a cloud service provider to facilitate HR and staff administrative support, this information will be stored on servers located within Australia. This includes the Integrated Catholic Online network (ICON) system.
 7. Personal information stored away from the School's main campus will be transmitted only via secure channels and accessible only to authorised personnel.
 8. Sacré Cœur's Privacy Policy and Data Protection sets out how all individuals or their authorised representative/s have a right to access, update and correct information that we hold about them specifically. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the School's duty of care to the student, or where students have provided information in confidence.
 9. The Sacré Cœur Privacy Policy and Data Protection also sets out how you may complain about a breach of The Australian Privacy Principles and who to contact.
 10. The School from time to time engages in fundraising activities. Personal information held by the School may be disclosed to organisations that assist in the School's fundraising, for example, the Sacré Cœur Foundation, Parents' Association, Past Parents' Association or Alumnae Association. Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.
 11. 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 School newsletters and magazines and on our parent portal. The School obtains an annual update from parents regarding permissions to publication and photography and this annual update determines whether parents would like to include images, video or other identifying material in promotional material for the School or otherwise make it available to the public such as on the website.
 12. We may include students' and parents' contact details in a class list and School directory. If you do not agree to this, you must advise us in writing.
 13. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why, that they can access that information if they wish and that the School does not usually disclose this information to third parties.