Privacy Policy

This Privacy Policy sets out how St Mary of the Cross MacKillop (SMCM) manages personal information provided to or collected by them.

SMCM is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988. In relation to health records, SMCM is also bound by the Health Records Act 2001 (Vic.).

SMCM may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the school’s operations and practices and to make sure it remains appropriate to the changing school environment.

What kind of personal information does SMCM collect and how does SMCM collect it?

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

- pupils and parents and/or guardians (‘parents’) before, during and after the course of a pupil's enrolment at SMCM;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with SMCM.

Personal Information you provide: SMCM will generally collect personal information held about an individual by way of forms filled out by parents or pupils, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents and pupils provide personal information.

Personal Information provided by other people: In some circumstances SMCM 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.

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 SMCM's treatment of an employee record unless required by law or organisational policy where the treatment is directly related to a current or former employment relationship between SMCM and employee. SMCM handles staff health records in accordance with the Health Privacy Principles in the Health Records Act 2001 (Vic.)

Anonymity: SMCM 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 SMCM may be done anonymously where practical, which may include making an inquiry, complaint or providing feedback.

How will SMCM use the personal information you provide?

SMCM 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.

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**Pupils and Parents:** In relation to personal information of pupils and parents, SMCM's primary purpose of collection is to enable SMCM to provide educational and support services for the pupil. This includes satisfying the needs of parents, the needs of the pupil and the needs of SMCM throughout the whole period the pupil is enrolled at SMCM.

The purposes for which SMCM uses personal information of pupils and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of SMCM;
- looking after pupils' educational, social and medical wellbeing;
- seeking donations and marketing for SMCM; and
- to satisfy SMCM's legal obligations and allow SMCM to discharge its duty of care.

In some cases where SMCM requests personal information about a pupil or parent, if the information requested is not provided, SMCM may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity.

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

The purposes for which SMCM uses 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 SMCM; and
- satisfying the SMCM's legal obligations, for example, in relation to child protection legislation.

**Volunteers:** SMCM also obtains personal information about volunteers who assist SMCM in its functions or conduct associated activities to enable SMCM and the volunteers to work together.

**Marketing and fundraising:** SMCM treats marketing and seeking donations for the future growth and development of the school as an important part of ensuring that SMCM continues to provide a quality learning environment in which both pupils and staff thrive. Personal information held by SMCM 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. SMCM publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.
Who might SMCM disclose personal information to and store your information with?

SMCM may disclose personal information, including sensitive information, held about an individual to:

- School service providers, including the Catholic Education Commission of Victoria (CECV), Catholic Education Offices specialist visiting teachers, counsellors and sports coaches, and other diocese;
- third party service providers that provide educational support services to SMCM and school systems such as the Integrated Catholic Online Network system (ICON);
- another school to facilitate the transfer of a student;
- government departments;
- medical practitioners;
- recipients of SMCM publications, such as newsletters and magazines;
- student's parents or guardians;
- anyone you authorise SMCM to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law.

Sending and storing information overseas: SMCM may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, SMCM will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

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.

How does SMCM treat sensitive information?

In referring to 'sensitive information', SMCM 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

SMCM staff are required to respect the confidentiality of pupils' and parents' personal information and the privacy of individuals.

SMCM has in place steps to protect the personal information the school 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.

Access and correction of personal information

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information and health records respectively which SMCM holds about them and to advise SMCM of any perceived inaccuracy. Pupils will generally be able to access and update their personal information through their parents, but older pupils 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 update any personal information SMCM holds about you or your child, please contact the Principal by telephone or in writing. SMCM may require you to verify your identity and specify what information you require.

Consent and rights of access to the personal information of pupils

SMCM respects every parent's right to make decisions concerning their child's education.

Generally, SMCM will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's parents. SMCM will treat consent given by parents as consent given on behalf of the pupil, and notice to parents will act as notice given to the pupil.

Parents may seek access to personal information held by SMCM about them or their child by contacting the Principal 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 SMCM's duty of care to the pupil.

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

Enquiries and complaints

If you would like further information about the way SMCM manages the personal information it holds, please contact the Principal by writing or telephone at principal@smcmeppingnth.catholic.edu.au or 8432 4500. SMCM 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.

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