

# ST THOMAS AQUINAS CATHOLIC PRIMARY SCHOOL

## NORLANE



### Personal Information Collection Policy – April 2019

This policy relates to the collection and storage of personal information at St Thomas Aquinas School, Norlane – referred to in this policy as 'the School'.

1. The School collects personal information, including sensitive information about students and parents or guardians and family members before and during the course of a student's enrolment at the School. This may be in writing or in the course of conversations and may be direct from the individual or from another source. The primary purpose of collecting this information is to enable the School, Catholic Education Offices and the Catholic Education Commission of Victoria Ltd (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 the School collects 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 (which includes information about any disability as defined by the *Disability Discrimination Act 1992*) is sensitive information within the terms of the Australian Privacy Principles (APPs) under the *Privacy Act 1988*. The School may require medical reports about students from time to time and may otherwise collect sensitive information about students and their families.
5. If any personal information requested by the School is not provided, this may affect the School's ability to enrol a student, respond to enquiries, provide the student with educational and support services or allow a person to visit the School.
6. The School may disclose personal and sensitive information for **administrative, educational and support purposes** (or may permit the information to be directly collected by third parties). This may include to:
  - School service providers such as the CECV, Catholic Education Offices, school governing bodies and other dioceses
  - third party service providers that provide online educational and assessment support services or applications (apps) which may include email and instant messaging

- app and software providers to the school are: CareMonkey, Tribal, nForma, ACER, School Interviews Online, Centorrino Technology, SC Technology
  - School systems, including the Integrated Catholic Online Network (ICON) and Google's 'G Suite' including Gmail. Limited personal information<sup>^</sup> may be collected and processed or stored by these providers in connection with these services
  - CECV and Catholic Education Offices to discharge its responsibilities under the *Australian Education Regulation 2013* (Regulation) and the *Australian Education Act 2013* (Cth) (AE Act) relating to students with a disability, including ongoing evaluation of funding adequacy for individual students
  - CECV to support the training of selected staff in the use of schools' systems, such as ICON
  - another school to facilitate the transfer of a student
  - Federal and State government departments and agencies acting on behalf of the government e.g. for audit purposes
  - health service providers, and people providing educational support and health services to the School, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools
  - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority
  - people providing administrative and financial services to the School
  - anyone you authorise the School to disclose information to; and
  - anyone to whom the School is required or authorised to disclose the information to by law, including under child protection laws.
7. The school is required by the Federal *Australian Education Regulation (2013) and Australian Education Act 2013* (Cth) (AE Act) to collect and disclose certain information under the *Nationally Consistent Collection of Data* (NCCD) on students with a disability. The school provides the required information at an individual student level to the Catholic Education Offices and the CECV, as 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.
8. Personal information collected from students is regularly disclosed to their parents or guardians.
9. The School may also use cloud computing service providers to store personal information (which may include sensitive information) on their servers in the 'cloud'. These servers may be located in or outside Australia. This may mean that personal information may be stored or processed outside Australia.
10. The School makes reasonable efforts to be satisfied about the protection 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 it will be located in countries with substantially similar protections as the APPs.
11. As the School uses Google's G-Suite including Gmail, some personal information (usually limited to name and email address) about students, parents or guardians may be transferred, stored and processed by Google in the United States, or in any other country through which Google provides these services or where it processes and stores information. This personal information will be stored and processed by

Google in accordance with Google's terms and conditions stated in the G-Suite for Education Agreement which the school entered into with Google.

12. The countries in which the servers of cloud service providers and other third party service providers may be located are:
  - United States
  - Chile
  - Taiwan
  - Singapore
  - Ireland
  - Netherlands
  - Denmark
  - Finland
  - Belgium
13. Where personal, including sensitive information is held by a cloud computing service provider on behalf of CECV for educational and administrative purposes, it may be stored on servers located within or outside Australia.
14. School personnel and the school's service providers, and the CECV 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 the ICON system and ensuring its proper use.
15. The School may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising.
16. The School's Privacy Policy is accessible via the school website, newsletter or from the School office. The policy sets out how parents, guardians or students may seek access to, and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, or may result in a breach of the School's duty of care to the student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
17. The School's Privacy Policy also sets out how parents, guardians, students and their family can make a complaint if they believe the School has interfered with their privacy and how the complaint will be handled.
18. On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. The School will obtain permissions from the student's parent or guardian (and from the student if appropriate) prior to publication to enable the school to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet. The school obtains permission as part of the enrolment process. Permissions obtained at enrolment may apply for the duration of the student's enrolment at the school unless the school is notified otherwise. Annually, the school will remind parents and guardians to notify the school if they wish to vary the permissions previously provided.
19. If you provide the School with the personal information of others, such as other family members, doctors or emergency contacts, we encourage you to inform them you are disclosing that information to the School and why, that they can request access to

and correction of that information if they wish and to also refer them to the School's Privacy Policy for further details about such requests and how the School otherwise handles personal information it collects and complaints it receives.