ST EUPHEMIA COLLEGE

Privacy Policy

Status	Approved by Senior Executive
Date of Approval	2 October 2026
Owner	Principal
Contact	Deputy Principal
Review Cycle	Two years
Date for Review	2 October 2028
Version	1.1 (Updated October 2026)

1. Purpose

This Policy outlines St Euphemia Colleges obligations under the Privacy Act 1988 (Commonwealth) and the Health Records and Information Privacy Act 2002 (NSW), and the processes for ensuring compliance with those obligations and protecting the privacy of individuals.

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.

2. Scope

This policy applies to all St Euphemia College staff, students, parents/carers, contractors, volunteers and visitors to the College.

3. Policy

Privacy is a human right, whose purpose is to protect information about a person's being, actions, association, and beliefs, ensuring their dignity, safety, and self-determination. Failure to protect privacy of information may result in reputational damage, emotional distress, identity theft, intimidation or financial loss.

St Euphemia College maintains records to better assist it to deliver the educational and other services that it provides and to comply with legal requirements. The College will only collect Personal Information that is reasonably necessary for its operations.

The College will notify or make the individual aware of the collection of Personal Information before the collection or as soon as reasonably practicable. When collecting information, the College will inform the individual of:

- The name and contacts for the College, if the individual has a complaint, wishes to access, or modify their Personal Information.
- The collection and the circumstances of the collection, if the individual was not aware of the collection, e.g., collection through third-party.
- Whether the collection is required by law.
- The purposes of the collection and the consequences if the individual objects to the collection (if any).
- The parties to whom the College may disclose the information (if applicable), e.g., contractors, government agencies.
- This Policy and its contents of this Policy.

4. Definitions

Term	Meaning
Data Breach	the unauthorised access or disclosure of Personal Information, or loss of Personal Information
Personal Information	a range of information or opinion that could identify an individual. Personal Information includes name, signature, address, phone number, date of birth, Sensitive Information, Credit Information, employment records, images, internet protocol (IP) address. Biometrics, location history (e.g., mobile device tracking). Personal Information does not include information publicity available.
Sensitive Information	Personal Information that includes information or opinion about a person's: ▪ Race or ethnic origin

	▪ Political opinion or association ▪ Religious or philosophical beliefs ▪ Sexual orientation or practices ▪ Criminal records ▪ Health or genetic information
Record(s)	a document, electronic or other device containing Personal Information
Staff	all persons employed by St Euphemia College, paid or unpaid, on permanent or causal basis, includes volunteers and contractors.
Student (s)	person of any age enrolled as a student at St Euphemia College
Health Information	sensitive information relating to the health or disability of a person, including a person's wishes about their preferences for treatment or health service provider(s). Includes information provided by a person to their health service provider.

5. Types of Information

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/carers 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)
  - 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
  - vehicle registration
  - photos and videos at College events
  - volunteering information.
- 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
- 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.

6. Collection of Information

6.1 **Solicited Information** 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, telephone calls or electronic means of communication. On occasion, people other than Parents and students provide personal information e.g. college records, medical records, counselling report, criminal checks.

All College families are asked to ensure the College is provided with current personal information. Similarly, staff are asked to provide and update personal information annually.

6.2 **Information collected from our website** The College may collect information based on how individuals use our website. We use ‘’cookies’’ and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns and to record statistics on web traffic. We do not use this information to personally identify individuals.

6.3 **Unsolicited Information** At times, the College may receive or collect Personal Information that it has not requested (Unsolicited Information). The College only holds, uses, and discloses Unsolicited Information if the College would or could have collected such information through its normal operations, e.g., enrolment.

Upon receiving Unsolicited Information, the College will determine if it could have received such information by other means through its normal operations. Otherwise, the College will destroy, permanently delete or de-identify the information. Staff must not make notes of Unsolicited Information received verbally.

6.4 **Sensitive Information** The collection of Sensitive Information is subject to:

- consent, except relating to information necessary to prevent or mitigate serious threat to the person.
- necessary to lessen or prevent a serious threat to life, health or safety
- another permitted general situation
- another permitted health situation.

We may share sensitive information to other entities in our organisation structure, but only if necessary for us to provide our products or services.

7. Consent

The College will request the individual’s consent for the collection and use of their Personal Information. The consent given by the Parent will be treated as a consent on behalf of the Student. Individuals may withdraw their consent at any time.

8. Use of Information

The College 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.

8.1 **Students and Parents** In relation to personal information of students and parents, the College's primary purpose of collection is to enable the College to provide schooling to students enrolled at the College, 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, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

The purposes include:

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

In some cases where the College 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.

8.2 **Applicants, Staff and Volunteers** The College will collect information from applicants, staff and volunteers for several purposes, including recruitment, employment, insurance and legal requirements.

8.3 **Contractors and Vendors** The College will collect information from contractors and vendors for several purposes, including; tenders, services, payment and/or to enable the College's operations.

9. Disclosure

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

- other schools and teachers at those schools
- 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 and/or cocurricular coaches, volunteers, and counsellors
- providers of learning and assessment tools and software vendors that provide educational software to the College (that might be installed on student PCs and tablet devices in agreement with the College)
- 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
- recipients of College publications, such as newsletters and magazines
- students' parents/carers
- anyone you authorise the College to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including Child Protection laws.

The College may disclose information about an individual to overseas recipients only when it is necessary, for example to facilitate a student exchange program. The College will not however send

information about an individual outside of Australia without their consent or otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

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 server which may be situated outside Australia. An example of such a cloud service provider is Google. College personnel and the AIS 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 and ensuring its proper use. St Euphemia College also uses, for example, Microsoft 365 and Edumate.

10. Storage and Security

St Euphemia College stores Personal Information in a variety of formats including, but not limited to:

- databases
- hard copy files
- personal devices, including laptop computers
- third party storage providers such as cloud storage facilities
- paper based files.

St Euphemia College takes all reasonable steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. These steps include, but are not limited to:

- Restricting access and user privilege of information by staff depending on their role and responsibilities.
- Ensuring staff do not share personal passwords.
- Ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege.
- Ensuring access to St Euphemia College's premises are secured at all times.
- Implementing physical security measures around the College buildings and grounds to prevent break-ins.
- Ensuring our IT and cyber security systems, policies and procedures are implemented and up to date.
- Ensuring staff comply with internal policies and procedures when handling the information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure as far as practicable that they are compliant with the APPs or a similar privacy regime.
- The destruction, deletion or de-identification of personal information we hold that is no longer needed, or required to be retained by any other laws.

Our public website may contain links to other third-party websites outside of St Euphemia College. St Euphemia College is not responsible for the information stored, accessed, used or disclosed on such websites and we cannot comment on their privacy policies.

11. Data Breaches

Data Breach might result from malicious third party's acts, human error, system failure or policy breach causing unauthorised access to or disclosure of Personal Information. Under the Notifiable Data Breach Scheme (NDB Scheme), the College must notify affected individuals and the Office of the Australian Information Commissioner (OAIC) in the event of an Eligible Data Breach, that is, a Data Breach:

- that is likely to result in risk of serious harm to the affected individual (s), and
- the College was unable to prevent the risk with remedial measures.

A serious harm includes physical, psychological, emotional, financial or reputational harm. Upon a Data Breach, the College will take appropriate, prompt action if we have reasonable grounds to believe that a data breach may have, or is suspected to have occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, notifying affected individuals and the OAIC.

If we are unable to notify individuals, we will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

12. Access to 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. Upon request, the College will provide the individual with access to their Personal Information held by St Euphemia College.

Requirements to access Personal Information:

- Writing request indicating the information subject to the request.
- Proof of identity, e.g., Parents' request for access to their child's information.
- Payment of access fees, if providing access to the information will subject the College to significant costs, e.g., high volume of documents, photocopy, costs associated with locating, retrieving or reviewing the information.

Exceptions to access include:

- Access may pose the risk of serious threat to the individual or public interest.
- Access would violate the privacy of others.
- The request is frivolous.
- The information is privileged or there is a legal requirement to deny access.
- The information could negatively affect negotiations with the person.
- Access is unlawful.
- The information would reveal commercially sensitive information.

The College will respond to a request for access within a reasonable timeframe and provide the information if reasonable to do so. If the College refuses access to information, the College will communicate the reasons for refusal to the individual.

Parents may request access to Personal Information of their child/ren. Requests for access to information must be directed to the Principal.

In some circumstances, the College may charge reasonable fees for access to Personal Information.

13. Photography by Parents or Students

Apart from concerts, assemblies and special events, approval must be obtained prior to taking any photographs, recordings or videos around the College. At special events, parents are asked to photograph their own children and should never distribute, store or display photographs of others' children, in either electronic or printed form, without their express permission. Similarly, College emblems or icons should not be used without the express permission of the Principal.

Notwithstanding, parents need to be mindful that their children may be photographed by other parents or visitors at College events or events at other Schools or venues. Students may only take photographs at school with the permission of their Year Adviser/teacher.

14. Enquiries and Complaints

The College welcomes feedback. Individuals who wish to:

- make a complaint
- obtain more information about how the College manages Personal Information
- believe the College has breached the Australian Privacy Principles should contact the Deputy Principal at jmano@steuphemia.nsw.edu.au or call (02) 9796 8240

St Euphemia College will investigate all complaints.

15. Related Legislation

- Privacy Act 1988 (Commonwealth)
- Australian Privacy Principles (APPs)
- Privacy and Personal Information Protection Act 1998 (NSW)
- My Health Records Act 2012 (Cth)
- Health Records and Information Privacy Act 2002 (NSW)
- Children's Guardian Act 2019 (NSW)
- Child Protection (Working with Children) Act 2012 (NSW)
- Child Protection (Working with Children) Regulation 2013 (NSW)
- Children and Young Persons (Care and Protection) Act 1998
- Crimes Act 1900 (NSW)
- Children and Young Persons (Care and Protection) Regulation 2012
- Children and Young Persons (Care and Protection) (Child Employment) Regulation 2015
- ISO 3100:2018

Related Documents

- Staff Code of Conduct
- Parent Code of Conduct
- Child Protection Policy
- ICT Incident Response Plan