



Genazzano FCJ College

Privacy Policy

Genazzano FCJ College is committed to complying with the National Privacy Laws by ensuring the privacy of all stakeholder information (students, staff and parents). This policy explains how the College will manage personal information in compliance with the privacy laws. Such National Laws include the:

- Privacy Amendment (Enhancing Privacy Legislation) Act 2012 (Cth)
- Health Records Act 2001 (Vic)

Collection of personal information

The College collects and holds personal information that is reasonably necessary for, or directly related to, the operation of the College and for the purpose of providing educational services to the students.

The College will collect the following personal information from:

- Students and parents and/or guardians before, during and after the course of a student's enrolment at the College including
 - Names, date of birth, identity documents, photographs, health information and sensitive information
 - Contact details and addresses
 - employment history, qualifications, police record, references
 - Parents' education, occupation and language background
 - medical information (e.g. details of disability and/or allergies, and details of any assistance the student receives in relation to those disabilities, medical reports, names of doctors)
 - conduct and complaint records, or other behaviour notes, College attendance and College reports
 - information about referrals to government welfare agencies
 - counselling reports
 - health fund details and Medicare number
 - any court orders
 - volunteering information (including Working With Children Checks)
 - photos and videos at College events.
- Staff members, job applicants, volunteers and independent contractors.
 - 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
 - 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.

The College collects personal information in the following ways:

- from parents/guardians through the enrolment process, face-to-face meetings, over the telephone and during the College year by way of forms completed by parents/guardians or students
- from students during the course of their enrolment at the College
- from third persons such as medical practitioners and health advisers
- from prospective employees through the recruitment process, at interviews, from past employers and referees
- from volunteers and contractors through our engagement processes.

Health information includes:

- Information or an opinion, that is also personal information, about:
 - The health or a disability (at any time) of an individual
 - An individual's expressed wishes about the future provision of health services to him or her, or
 - A health service provided, or to be provided, to an individual, or
- Other personal information collected to provide, or in providing, a health service.

Sensitive information is a subset of personal information and includes:

- Information or opinion, that is also personal information, about an individual's:
 - Racial or ethnic origin
 - Religious beliefs or affiliations
 - Philosophical beliefs
 - Membership of a professional or trade association
 - Criminal record.
- Health information about an individual.

We may also collect personal information, including sensitive information, if the information is required or authorised by or under an Australian law. If we do collect personal information in these circumstances, we will notify the individual(s) of that fact (and of the name of the Australian law that requires or authorises the collection of the information). The College may disclose personal student and parent information to overseas recipients where approval to do so has been granted (e.g. international student tours).

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.



Purpose of collecting, holding, using and disclosing personal information

The College will not collect personal information about an individual unless it is reasonably necessary for its functions and activities. The College will not collect sensitive information unless consent is provided and the information is necessary for, or directly related to, the functions and activities of the College.

In the case of students and parents, the purpose for collecting, holding, using and disclosing personal information include:

- Enable the student's application for enrolment to be properly assessed
- Keep parents informed about matters related to their child's schooling
- Assist with the administration of the College's operations
- Look after the education, social and wellbeing of the student
- Seek donations and fundraising assistance for the College
- Seeking feedback from students and parents on school performance and improvement, including through school improvement surveys
- Satisfy the College's legal obligations as an educational institution and to discharge its duty of care to its students
- To satisfy the College service providers' legal obligations, including the Catholic Education Commission of Victoria Ltd (CECV) and the Catholic Education Offices.
- To inform Genazzano FCJ College Alumnae Inc and College clubs and parent associations of contact details for members and parents.*

** Such details can be withheld upon individual request*

In the case of job applicants, volunteers and contractors, the purpose for collecting, holding, using and disclosing personal information include:

- To assess and, if successful, engage the person at the College
- Administering the individual's employment or contract, as the case may be
- For insurance purposes
- To assist with the administration of the College's operations
- To satisfy the College's legal obligations, for example, in relation to child protection legislation
- Seeking donations and marketing for the College

If a parent/guardian or student does not provide the College with the information it seeks then it may not be able to enrol or continue the enrolment of the student or be able to provide necessary services to the student during their education at the College.

If a job applicant, volunteer or contractor does not provide the College with the personal information it seeks then the College may not be able to engage or continue to engage the person at the College.

Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumnae associations, to enable the College and the volunteers to work together, 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, the College's Foundation or Alumnae Association or, on occasions, external fundraising organisations].

Parents, 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 and store your information with?

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

- College service providers which provide educational, support and health services to the College, (either at the College or off campus) including the Catholic Education Commission of Victoria Ltd (CECV), Catholic Education Offices, specialist visiting teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools
- Third party service providers that provide online educational and assessment support services, services in relation to school improvement surveys, document and data management services, or applications to Colleges and College systems including the Integrated Catholic Online Network (ICON), Google's G Suite and, where necessary, to support the training of selected staff in the use of 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.
- 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
- Another school including to its teachers to facilitate the transfer of a student
- Federal and State government departments and agencies
- Health service providers
- Recipients of College publications, such as newsletters and magazines
- Student's parents or guardians and their emergency contacts
- Assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority
- Anyone you authorise the College to disclose information to
- Anyone who we are required or authorised to disclose the information to by law, including child protection laws.
- Diocesan and Parish authorities
- Parents
- Other schools with whom the College interacts
- Insurance companies
- Genazzano Alumnae Association and College parent associations.

Nationally Consistent Collection of Data on College Students with Disability

The College 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 College 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.



Sending and storing information overseas

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

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

The College may from time to time use the services of third party 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's G Suite, including Gmail) which may be accessible by you. 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, and the CECV and its service providers, may have the ability to access, monitor, use or disclose emails, communications, 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 APPs.

The countries in which the servers of cloud service providers and other third party service providers are located may include: USA, UK, Canada, France, Chile, Taiwan, Singapore, Netherlands, Finland, Belgium

Where personal and sensitive information is retained by a cloud service provider on behalf of CECV to facilitate Human Resources and staff administrative support, this information may be stored on servers located in or outside Australia.

How does the College treat sensitive information?

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

The College's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.

The College has in place 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 password access rights to computerised records. This includes responding to any incidents which may affect the security of the personal information it holds. If we assess 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.



It is recommended that parents and the College community adopt secure practices to protect themselves. You should ensure that all passwords you use are strong and regularly updated and that your log in details are kept secure. Do not share your personal information with anyone without first verifying their identity and organisation. If you believe any of your personal information has been compromised, please let the College know immediately.

Access to personal information

Requests for access to information the College holds about an individual may be made and the College will respond to such requests within a reasonable time.

Advice can also be provided to the College to correct Personal information if it is inaccurate.

Unsuccessful job applicants' details will be destroyed unless the College requests and consent is provided to the information being held for future positions that may arise.

The College will take reasonable steps to ensure that all personal information held by it is up-to-date, complete, relevant, not misleading and accurate.

In some circumstances, it may be lawful for the College to refuse access to the personal information it holds.

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 the access rights set out in the applicable legislation.

The College may require you to verify your identity and specify what information you require. The College 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 College 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.

Consent and rights of access to the personal information of students

The College respects every Parent's right to make decisions concerning their child's education.

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. The College 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 the College about them or their child. 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. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.



Requests for access or correction of your personal information are to be made to the Privacy Officer (College Chief Operating Officer):

The Privacy Officer
Genazzano FCJ College
301 Cotham Road
Kew VIC 3101

Telephone: (03) 8862 1000
Fax: (03) 8862 1133
Email: businessoffice@genazzano.vic.edu.au

Please note that this policy does not apply to the records of job applicants who become an employee of the College.

Security and quality of your personal information

The College will take reasonable steps to protect the personal information it holds from misuse, interference and loss and from unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computer records. Further, the College staff are required to respect the confidentiality of personal information held by the College.

The College will also take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, up to date, complete and relevant.

Notification of collection of personal information

You are notified by this Privacy Policy of the collection of your personal information by:
Genazzano FCJ College Limited
301 Cotham Road
Kew VIC 3101

A Collection Notice will be included with all Enrolment and Employment letters of offer. A copy of the policy will be included on the College intranet (GenConnect) and available for inspection at the main College Reception.

Complaints

Complaints can be made if it is considered that the College has interfered with privacy of an individual(s) because of an alleged breach of the privacy principles under the privacy laws.

The procedure for a complaint is:

- a. A written complaint must be forwarded to the Privacy Officer and must specify details of the alleged breach.
- b. The Privacy Officer will consider your complaint and make a determination within 45 days. You will be advised of the determination in writing.
- c. If the Privacy Officer determines that there has been a breach of the privacy principles, he or she will advise the relevant persons at the College in writing of any action required in order to remedy the breach. If the breach is not remedied within 30 days the Privacy Officer must inform the Principal of the College.
- d. The Privacy Officer will keep a record of all complaints and determinations together with a record of the action taken to remedy any breach.



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If you are not satisfied with the College's decision, you may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are:

GPO Box 5218, Sydney, NSW 2001

Telephone: 1300 363 992

www.oaic.gov.au

Reporting and Review

This policy will be the responsibility of the Privacy Officer to administer and maintain in accordance with the requirements above and relevant legislation. The policy will be reviewed by the Privacy Officer every three years (or as legislation changes) with recommended changes to be presented to the College Executive and College Council.

Original Policy Ratified by Policy Review Committee August 2006 and College Council
November 2006 Amended Policy reviewed by College Executive July 2014.