

ST BEDE'S COLLEGE

2 MENTONE PARADE, MENTONE, VICTORIA 3194

POLICIES

Phone: 9582 5999 Fax: 9582 5757 www.stbedes.catholic.edu.au ABN: 59 127 195 135



Privacy Policy

Purpose:

This Privacy Policy sets out how the College manages personal information provided to or collected by it.

Scope:

St Bede's College aims to maintain the highest level of integrity in its dealings with all members of the St Bede's College community. St Bede's College will demonstrate its firm commitment to protecting personal privacy and address the collection, use, security of and access to information that may be obtained by the College in its day to day organisation and respect the rights of the individual to confidentiality.

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

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.

Statement of Policy:

In dealing with personal and sensitive information about individuals, St Bede's College is bound by the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) in the Privacy Amendment (Private Sector) Act 2000 (Cth) and the Health Records Act 2001 (Vic). This policy describes the way St Bede's College uses and manages personal information provided to or collected by it in accord with these principles and laws.

Guidelines:

What kinds of personal information does the School collect and how does the School collect it?

The type of information the School 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 the School;
- o job applicants, staff members, volunteers and contractors; and
- o other people who come into contact with the School.

• Personal Information you provide

The School 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 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.

• 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 unless required by law or organisational policy 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 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 College may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

How will the School use the personal information you provide?

The School 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.

• Implementation:

The College collects and holds personal information about students, parents and/or guardians before, during and after the course of a student's enrolment the College. The College also holds personal information from job applications, staff members, volunteers, contractors and other people who come into contact with the College.

This information is provided to the College by the individuals (or families) concerned usually by way of forms filled out by parents or students, face-to-face meetings and interviews, and telephone calls and by a third party, for instance a report from a medical professional or a reference from another school.

The use of this information is primarily for the intended use of it collection and a secondary purpose related to the primary purpose of collection and which are reasonably expected, or to which the individual or family has consented.

• Students and Families

In relation to personal information of students and Parents, the College's primary purpose of collection is to enable the College to provide educational and support services for the pupil. 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 for which the College uses personal information of students 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 the College;
- o looking after students' educational, social and medical wellbeing;
- o seeking donations and marketing for the College; and
- o 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, 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.

• Job applicants, staff members and contractors

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

The purposes for which the College uses personal information of job applicants, staff members and contractors include:

- o in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the College; and
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

Volunteers

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as Old Collegians/College productions, to enable the College and the volunteers to work together.

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 Old Collegians organisation.

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, may be used for marketing purposes.

Disclosing personal information

The College 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;
- o third party service providers that provide educational support services to schools and school systems such as the Integrated Catholic Online Network system (ICON);
- o another school to facilitate the transfer of a student;
- o government departments;
- medical practitioners;
- o recipients of School publications, such as newsletters and magazines;
- student's parents or guardians;
- o anyone you authorise the School to disclose information to; and
- o anyone to whom we are required or authorised to disclose the information to by law.

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:

- o 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.

The College may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia. If the 'cloud' storage is outside Australia the College has taken reasonable steps to ensure that the 'cloud' storage is located in a country which offers similar protection to the APPs.

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 the College treat sensitive information?

In referring to 'sensitive information', the College 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

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.

• 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 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.

To make a request to access or update any personal information the College holds about you or your child, please contact the College Principal in writing. 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. As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the College Principal. 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 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 so warranted.

• Enquiries and complaints

If you would like further information about the way the College manages the personal information it holds, or wish to complain that you believe that the College has breached the Australian Privacy Principles please contact the College Principal. The College 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.

Associated Documents:

- Photograph/Video Permission Form (Attachment 1)
- Checklist for Compliance with the Australian Privacy Principles (Attachment 2)
- Standard Collection Notice (Attachment 3)
- CEOM Policy 2.21 Information Privacy Policy 2009 (Attachment 4)
- Employment Collection Notice (Attachment 5)
- National Catholic Education Commission and National Council of Independent Schools' Association,
 Privacy Compliance Manual, November 2013
- Enrolment Policy
- Fee Policy
- Occupational Health & Safety Policy

- Academic Progress Policy
- Financial Policy
- Confidentiality Policy
- First Aid Policy

Document Authorisation:

Br Chis Gruge

Br Chris Gorringe ST BEDE'S COLLEGE BOARD CHAIR

Evaluation:

	This	policy	will be	reviewed	as part	of the	College's	three-	vear revie	w cycle
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Reviewed: October 2015

Board Chair: Br Chris Gorringe

Principal: Br Garry Coyte

*Next Review Date:

^{*}Policy placed in Handbook and staff alerted each year to the policy



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2 MENTONE PARADE, MENTONE, VICTORIA 3194

Phone: 9582 5999 Fax: 9582 5757 www.stbedes.catholic.edu.au ABN: 59 127 195 135

Photograph/Video Permission Form

Dear Parent/Guardian

At certain times throughout the year, our students may have the opportunity to be photographed or filmed for our College publications, such as the College's newsletter or website and social media, or to promote the College in newspapers and other media.

The Catholic Education Office Melbourne (CEOM) and the Catholic Education Commission of Victoria Ltd (CECV) may also wish to use student photographs/videos in print and online promotional, marketing, media and educational materials.

We would like your permission to use your child's photograph/video for the above purposes. Please complete the permission form below and return to the College as soon as possible.

Thank you for your continued support.	
STUDENT'S NAME:	YEAR LEVEL:

- I give permission for my child's photograph/video and name to be published in:
 - the College newsletter
 - the College intranet
 - the College website
 - social media
 - promotional materials
 - newspapers and other media.
- I authorise the CEOM/CECV to use the photograph/video in material available free of charge to schools and education departments around Australia for the CEOM/CECV's promotional, marketing, media and educational purposes.
- I give permission for a photograph/video of my child to be used by the CEOM/CECV in the agreed publications without acknowledgment, remuneration or compensation.
- I understand and agree that if I do not wish to consent to my child's photograph/video appearing in any or all of the publications above, or if I wish to withdraw this authorisation and consent, it is my responsibility to notify the school.

Licensed under NEALS: The photograph/video may appear in material which will be available to schools and education departments around Australia under the National Educational Access Licence for Schools (NEALS), which is a licence between education departments of the various states and territories, allowing schools to use licensed material wholly and freely for educational purposes.

Name of Parent / Guardian (please circle)	
Signed: Parent/Guardian	Date:
If Student is aged 15+, student nust also sign: Signed: Student	Date:
Any personal information will be stored used and disclosed in asserdance	with the requirements of the Drivery Act 1000 (Cth)

Any personal information will be stored, used and disclosed in accordance with the requirements of the Privacy Act 1988 (Cth).

Attachment 2:

CHECKLIST FOR COMPLIANCE WITH THE AUSTRALIAN PRIVACY PRINCIPLES

(Annexure 1 – Summary of a School's Obligations Imposed by the APPs)

This summary of a school's obligations imposed by the Australian Privacy Principles (APPs), which can be used as a checklist for schools, is an extract from the document *Privacy Compliance Manual*, prepared by Minter Ellison Lawyers for schools and systems represented by the National Catholic Education Commission. The document was made available to schools in Victoria in November 2013.

For further information about the APPs, refer to Part 2 of the Privacy Compliance Manual.

Annexure 1 - Summary of A School's Obligations Imposed By The Apps

- 1. Manage personal information in an open and transparent way.
- 2. Take such steps as are reasonable in the circumstances to implement practices, procedures and systems relating to the School's functions or activities that:
 - a. will ensure compliance with the APPs; and
 - b. will enable the School to deal with inquiries or complaints about compliance with the APPs.
- 3. Have a clearly expressed and up-to-date Privacy Policy about the School's management of personal information.
- 4. If it is lawful or practicable, give individuals the option of interacting anonymously with the School or using a pseudonym.
- 5. Only collect personal information that is reasonably necessary for the School's functions or activities.
- 6. Obtain consent to collect sensitive information unless specified exemptions apply.
- 7. Use fair and lawful means to collect personal information.
- 8. Collect personal information directly from an individual if it is reasonable and practicable to do so.
- 9. If the School receives unsolicited personal information, determine whether it could have collected the information under APP 3 as if it had solicited the information. If so, APPs 5-13 will apply. If not, the information must be destroyed or de-identified.
- 10. At the time the School collects personal information or as soon as practicable afterwards, take such steps (if any) as are reasonable in the circumstances to make an individual aware of:
 - a. why the School is collecting information about them;
 - b. who else the School might give it to; and
 - c. other specified matters.
- 11. Take such steps (if any) as are reasonable in the circumstances to ensure the individual is aware of this information even if the School has collected it from someone else.
- 12. Only use or disclose personal information for the primary purpose of collection unless one of the exceptions in APP 6.2 applies (for example, for a related secondary purpose within the individual's reasonable expectations, you have consent or there are specified law enforcement or public health and public safety circumstances).
- 13. If the information is sensitive, the uses or disclosures allowed are more limited. A secondary purpose within reasonable expectations must be directly related to the primary purpose of collection.
- 14. Do not use personal information for direct marketing, unless one of the exceptions in APP 7 applies (for example, the School has obtained consent or where the individual has a reasonable expectation of their

- information being used or disclosed for that purpose and the School has provided a simple means for the individual to unsubscribe from such communications).
- 15. Before the School discloses personal information to an overseas recipient it must take such steps as are reasonable in the circumstances to ensure that the recipient does not breach the APPs, unless an exception applies.
- 16. Government related identifiers must not be adopted, used or disclosed unless one of the exceptions applies (eg. the use or disclosure is reasonably necessary to verify the identity of the individual for the purposes of the School's functions or activities).
- 17. Take such steps (if any) as are reasonable in the circumstances to ensure the personal information the School collects, uses or discloses is accurate, complete and up-to-date. This may require the School to correct the information and possibly advise organisations to whom it has disclosed the information of the correction.
- 18. Take such steps as are reasonable in the circumstances to protect the personal information the School holds from misuse, interference and loss and from unauthorised access, modification or disclosure.
- 19. Take such steps as are reasonable in the circumstances to destroy or permanently de-identify personal information no longer needed for any purpose for which the School may use or disclose the information.
- 20. If requested, the School must give access to the personal information it holds about an individual unless particular circumstances apply that allow it to limit the extent to which it gives access.

Note: This is a summary only and NOT a full statement of obligations.

STANDARD COLLECTION NOTICE

This standard collection notice has been prepared with consideration to legal advice

- The School collects personal information, including sensitive information about students and parents
 or guardians before and during the course of a student's enrolment at the School. This may be in
 writing or in the course of conversations. 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 students from time to time.
- 5. The School may disclose personal and sensitive information for administrative, educational and support purposes. This may include to:
 - School service providers such as the Catholic Education Commission of Victoria, Catholic Education Offices, parish, school governing bodies and other dioceses;
 - third party service providers that provide educational support services to schools and school systems such as the Integrated Catholic Online Network (ICON) system;
 - another school to facilitate the transfer of a student;
 - government departments;
 - medical practitioners, and people providing educational, support and health services to the School, including specialist visiting teachers, sports coaches, volunteers and counsellors;
 - anyone you authorise the School to disclose information to; and
 - anyone to whom we are required or authorised to disclose the information to by law.
 - 6. Personal information collected from students is regularly disclosed to their parents or guardians.
 - 7. The School also uses 'Google Apps for Education' (GAFE) including Gmail. Through the use of these services, personal information of pupils, parents or guardians may be transferred, stored and processed by Google in the United States, or any other country Google uses to provide these services. School personnel and the Catholic Education Commission of Victoria and their 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 system and ensuring its proper use.

- 8. Where personal information is held by GAFE it will be limited and may include:
 - Name
 - Email Address
 - Student Date of Birth

Personal information held by GAFE will be stored in accordance with APPs.

- 9. The School may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia. If the 'cloud' storage is outside Australia the College has taken reasonable steps to ensure that the 'cloud' storage is located in a country which offers similar protection to the APPs.
- 10. Where personal and sensitive information is retained by the CECV by a cloud service provider for educational and administrative purposes, it will be stored on servers located within Australia. This includes the Integrated Catholic Online Network (ICON) system.
- 11. The School's Privacy Policy is accessible via the school website, newsletter, handbook or from the school office. The policy sets out how parents, guardians or students may seek access to personal information collected about them. However, there may 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.
- 12. The School's Privacy Policy also sets out how parents and students can make a complaint about a breach of the Australian Privacy Principles and how the complaint will be handled.
- 13. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. [It may also be disclosed to organisations that assist in the School's fundraising activities solely for that purpose.] We will not disclose your personal information to third parties for their own marketing purposes without your consent.
- 14. 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 on enrolment from the student's parent or guardian (and from the student if appropriate) prior to publication if we would like 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.
- 15. If you provide the School with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them 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.

Attachment 4:

Catholic Education Office Melbourne

Policy 2.21

Information Privacy Policy

Rationale

In dealing with personal and sensitive information about individuals, the Catholic Education Office Melbourne (CEOM) is bound by the Privacy Act 1988 (Cth), the National Privacy Principles (NPPs) in the Privacy Amendment (Private Sector) Act 2000 (Cth) and the Health Records Act 2001 (Vic). This policy describes the way the CEOM uses and manages personal information provided to or collected by it in accord with these principles and laws. In this policy a reference to 'information' is a reference to both personal and health information.

Definitions

Personal information Information or an opinion (whether true or not) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Examples includes names, addresses, telephone numbers, date of birth. Personal information does not include health information.

Health information Any information or opinion about the health or disability 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. Examples include health records, certificates, details of medical background, health assessment results.

National Privacy Principles (NPPs) Principles established under the Privacy Amendment (Private Sector) Act 2000 (Cth) that set out minimum standards on how organisations deal with the collection, use and disclosure, transfer, handling and storage of personal information.

Sensitive information Information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record. Sensitive information includes health information about an individual.

Identifier A number assigned to an individual to identify uniquely that individual for the purposes of an organisation's work, e.g. a Medicare number. Unique identifiers are used to facilitate data matching. As data matching can reduce privacy, organisations are required under the NPPs to limit the creation and use of identifiers.

Principles

Privacy The CEOM respects the right of an individual to have their personal and health information protected.

Procedures

The following procedures describe the ways in which the CEOM collects, protects and uses information about individuals that is collected by or supplied to it.

1. Collection and storage of personal information

The CEOM collects information from individuals to assist it in its work of advising and supporting Catholic Colleges in the Archdiocese of Melbourne. In compliance with the relevant legislation, the CEOM only collects information that is necessary in order for it to perform one or more of its functions or activities.

The CEOM collects information by way of forms filled out by an individual, face-to-face meetings, interviews or telephone calls. In accordance with the NPPs, the CEOM will ensure that the individual supplying the information is told why the information is being collected and the organisations (or the types of organisations) to which it usually discloses the information it collects.

In some circumstances the CEOM may be provided with information about an individual from a third party, for example, information provided by a health professional or from another employer or source.

The type of information that the CEOM collects includes (but is not limited to) information, including sensitive information, about:

- students and parents and/or guardians (parents) before, during and after the course of a student's enrolment at a Catholic College in the Archdiocese of Melbourne
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the CEOM.
 The CEOM will take reasonable steps to protect information it holds from misuse, loss, unauthorised access, modification or disclosure. Internal procedures have been developed and staff training has been provided to ensure the privacy of this information.

In accordance with the NPPs, the CEOM does not use identifiers assigned by another organisation or an agent of another organisation to identify individuals for the purposes of its work.

NOTE

The NPPs do not apply to an employee record. As a result, this policy does not apply to the CEOM's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the CEOM and an employee.

2. Use and disclosure of personal information

The CEOM uses personal information about students and parents to:

- assist with students' wellbeing
- satisfy the CEOM's accountability and legal obligations and allow the CEOM to discharge its duty of care.

The CEOM uses personal information about job applicants, staff members, contractors and volunteers for:

- assessing an individual's suitability for employment or for work as a volunteer
- administering the individual's employment or contract, as the case may be
- insurance purposes
- satisfying the CEOM's legal obligations, for example, in relation to child protection legislation.
 The CEOM will use and disclose information only for the purpose for which it was collected (the primary purpose) or a related secondary purpose that the individual would reasonably expect, or to which they have consented. A secondary purpose may include the use of personal information to develop a case for funding increases for targeted groups of students.

3. Access to personal information

a. Access by the individual to information about them

Under the relevant privacy legislation, an individual may seek access to information held about him or her and parents may seek access to information held by the CEOM about their child. The CEOM may require verification of identity and details of the information required.

Generally, the CEOM will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. The CEOM 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.

There will be occasions when access is denied. Such occasions would include where release of information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the CEOM's duty of care to a student.

The CEOM may, at its discretion, on the request of a student, grant that student access to information held by the CEOM about him/her, or allow a student to give or withhold consent to the use of his/her personal information, independently of his/her parents. This would normally be done only when the maturity of the student and or/the student's personal circumstances so warranted.

b. Access by another organisation or individual to information held by the CEOM.

The CEOM may disclose information, including sensitive information, held about an individual to:

- a College
- another Catholic education office
- government departments
- health practitioners
- professionals providing a service to the CEOM
- recipients of CEOM publications (such information being de-identified prior to use)
- anyone you authorise the CEOM to disclose information to.

The CEOM will not send personal information about an individual outside Australia without:

- · obtaining the consent of the individual (may be implied) or
- otherwise complying with the relevant legislation.

The CEOM endeavours to ensure that the personal information it holds is accurate, complete and up to date. A person may seek to update the information held by the CEOM about them by contacting the CEOM at any time.

4. Enquiries and complaints

For information about the way CEOM manages personal information, requests by an individual to access personal information, or complaints in relation to the collection or use of personal information or access to personal information held by the CEOM please contact:

Executive Director of Catholic Education Archdiocese of Melbourne PO Box 3 EAST MELBOURNE VIC 8002 execdirector@ceomelb.catholic.edu.au

CEOM 2009 (Revised)

Attachment 5:

EMPLOYMENT COLLECTION NOTICE

This "sample" employment collection notice is an extract from the document *Privacy Compliance Manual*, prepared by Minter Ellison Lawyers for schools and systems represented by the National Catholic Education Commission. The document was made available to Catholic schools in Victoria in November 2013.

For further information about this notice, refer to Section 9, page 29, of the *Privacy Compliance Manual*.

Employment Collection Notice

- 1. In applying for this position you will be providing St Bede's College with personal information. We can be contacted at 2 Mentone Parade, Mentone, 9582 5999, stbedes.catholic.edu.au.
- 2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
- 3. St Bede's College Privacy Policy contains details of how you may complain about a breach of the APPs or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
- 4. We will not disclose this information to a third party without your consent.
- 5. We are required to conduct a criminal record check to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection Laws. We may also collect personal information about you in accordance with these laws.
- 6. St Bede's College may store personal information in the "cloud", which may mean that it resides on served which are situated outside Australia.
- 7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to St Bede's College and why, that they can access that information if they wish and that the St Bede's College does not usually disclose the information to third parties.*

^{*} If applicable