



Privacy Policy

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Purpose

St Michael's Collegiate School (the School) values the safe handling of personal information. This policy outlines how the School collects, uses, discloses, and protects personal information, ensuring compliance with privacy laws, and transparency, trust, and accountability in handling data.

Scope

This policy applies to students, parents and/or guardians ("parents"), job applicants, alumni, volunteers, contractors, service providers, visitors, website users and other people with whom the School ordinarily interacts.

This policy applies to staff in other contexts, including (but not limited to) when:

- staff use School ICT systems, email or internet services;
- staff appear in photographs, videos or CCTV recordings; or
- staff engage with the School in a non-employment capacity (e.g. as parents, alumni, volunteers, or participants in events).

Employee Records

This policy does not apply to the School's handling of employee records, as these are exempt from the Australian Privacy Principles under the Privacy Act 1988 (Cth) where the handling of those records is directly related to a current or former employment relationship.

For any questions regarding the handling of employee records, contact the Risk and Compliance Manager on the details below for assistance.

The School handles health records in accordance with the *Personal Information Protection Act 2004* (Tas).

Policy

The School complies with the Australian Privacy Principles (APPs), which are part of the Privacy Act 1988 (Cth). The APPs require the School to have a readily available Privacy Policy that describes how the School collects, uses, discloses and manages the personal information it holds.

The School is also bound by other relevant legislation, including:

- *Education Services for Overseas Students Act 2000* (Cth)
- *Australian Education Act 2013* (Cth)
- *Australian Education Regulations 2023* (Cth)
- *Disability Discrimination Act 1992* (Cth)
- *Education Act 2016* (Tas)
- *Personal Information Protection Act 2004* (Tas)

The School recognises that protecting individuals' privacy is of fundamental importance and required by law. This Privacy Policy explains:

- what sorts of personal information the School collects;
- how the School may use that personal information and to whom it may be disclosed;
- how the School protects the personal information held from unauthorised use or disclosure; and
- how to access and correct the personal information the School holds, and options to complain if it is believed the School has breached its privacy obligations.

The School reserves the right (at its discretion) to modify, amend or replace this policy from time to time 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. The modified, amended or replaced policy will be posted by the School to its website in place of the older Privacy Policy and notified to students, and parents.

Definitions

Personal Information

According to the Privacy Act, 'personal information' means information or an opinion about an identified individual, or a reasonably identifiable individual.

Sensitive Information

According to the Privacy Act, 'sensitive information' means personal information relating to a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, membership of a trade union or other professional or trade

association membership, philosophical beliefs, sexual orientation or practices, or criminal record. It also includes health or genetic information about an individual or biometric information used for specific purposes.

The School will only:

- collect sensitive information where agreed, and it is reasonably necessary for the School's functions and activities;
- use and disclose sensitive information:
 - for the purpose for which it was collected or a directly related secondary purpose that would be reasonably expected unless agreed otherwise, or
- otherwise collect, use and disclose sensitive information as authorised or required by law.

Types of Personal Information the School Collects and Holds

The School collects and holds a range of personal information, including some health and other sensitive information, about students, parents, job applicants, volunteers, contractors, service providers, visitors and website users, which may include the following:

Students

Before, during and after a student's enrolment, the School may collect the following information about the student:

- full name, date of birth, gender, contact details including emergency contacts and next of kin;
- nationality, languages spoken;
- details of previous schooling;
- health fund and Medicare details;
- school reports, attendance records, behaviour and complaint reports and/or notes;
- immunisation records and counselling reports;
- health information (disabilities/allergies/medical certificates, etc. – includes mental health);
- information regarding referrals to government welfare agencies;
- details of any relevant court orders;
- photos and/or videos (taken at school events or by closed-circuit television cameras ("CCTV"));
- photos and/or videos of student's artwork or assessment pieces;

- residency, visa status/citizenship;
- passport number, expiry date and copies of relevant pages;
- visa number, expiry date and copy of grant document; and
- dietary information for catering.

The School may also collect the following types of sensitive information about students only where necessary or appropriate, or the student/parent has otherwise consented:

- racial or ethnic origin (including if students identify as Aboriginal or Torres Strait Islander);
- religious background;
- criminal record; and
- health information (disabilities/allergies/medical certificates, etc. – includes mental health).

Parents

Before, during and after a student's enrolment, the School may collect the following information about their parents:

- full name, date of birth/age, contact details;
- nationality, languages spoken;
- occupation and educational history;
- health fund details and Medicare number
- court orders (such as intervention and restraining orders) and parenting plans; and
- financial information (particularly if requesting alternative fee arrangements due to financial hardship), such as employment details, salary and income, assets and liabilities, and supporting or additional requested documents.

The School may also collect the following types of sensitive information about parents:

- racial or ethnic origin (including if students identify as Aboriginal or Torres Strait Islander); and
- religious background.

Job Applicants, Alumni, Volunteers, Service Providers and Contractors

The School may collect the following types of personal information about other people who interact with the School:

- full name, date of birth/age, contact details, emergency contact/next of kin;
- languages spoken;

- resumes, employment histories and qualifications, training records and competency assessments, references, and professional development history;
- salary and payment information, including superannuation details;
- complaint records and investigation reports;
- Details of licences held (i.e. driver licence)
- health information (disabilities/allergies/medical certificates, etc. – includes mental health);
- residency, visa status/citizenship;
- visa number, expiry date and copy of grant document; and
- dietary information for catering.
- leave details;
- willingness to mentor and assist at events;
- photos and videos at School events;
- workplace surveillance records; and
- work emails and internet browsing history when using the School email address or resources.

The School may also collect the following types of sensitive information only where necessary or appropriate, or otherwise consented:

- racial or ethnic origin (including if students identify as Aboriginal or Torres Strait Islander);
- medical information (e.g. details of disability and/or allergies, and medical certificates); and
- criminal record.

Website Users

The School may also collect information about accessing the website using a technology called 'cookies'. That information includes the pages viewed and the information downloaded, the IP address of the computer or mobile used to visit the School's website, the page from where the individual visited the website, the type of browser used, unique device identifiers and information about websites visited before the individual visited the website. A browser can be configured to disable cookies, but some parts of the School's website may not function properly (or at all) if cookies are disabled.

Purpose of Collecting Personal Information

The School's primary purpose for collecting personal information is to support the functions and activities of the School, including:

- generating statistical data and reports for policy and funding purposes;
- enabling the Department for Education, Children and Young People to comply with their reporting requirements;
- reporting to educational and Government authorities
- organising and managing events/functions;
- for insurance purposes, internal accounting and administration;
- for publications such as magazines and newsletters, including publication of that material (both physically and online); and
- seeking donations and marketing for the School.

Students and Parents

The School's primary purpose for collecting personal information about students and parents is to enable the School to provide schooling to students enrolled at the School, exercise its duty of care, and perform all the associated activities that are necessary to enable students to take part in all the activities of the School, including:

- supporting students' social and emotional wellbeing and health;
- fulfilling legal requirements including:
 - taking reasonable steps to reduce the risk of harm to students, staff and visitors;
 - making reasonable adjustments for students with disabilities; and
 - ensuring, as far as reasonably practicable, the health and safety of people in the School workplaces; and
- communicating with Parents,

And in particular with regard to international students:

- complying with the School's obligations under Australian laws (such as the *Education Services for Overseas Students Act 2000* (Cth) and the National Code of Practice for Providers of Education and Training to Overseas Students); and
- organising hospital, medical, transport, catering and tutoring services.

In some cases where the School requests personal information about a student or parent, if the information requested is not provided, the School 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, Volunteers, Service Providers and Contractors

The School's primary purpose for collecting personal information regarding other people who interact with the School is to assess their suitability and manage the relationship, including:

- fulfilling legal requirements, including:
 - taking reasonable steps to reduce the risk of harm to students, staff and visitors;
 - make reasonable adjustments for individuals with disabilities; and
 - complying with child protection legislation; and
- assessing an applicant's suitability for employment or a volunteer position and enabling the School and the applicant or volunteer to work together.

How Does the School Collect Personal Information?

The School collects personal information about an individual directly from that individual, where reasonable and practicable to do so. The School collects the information in a variety of ways, including:

- electronic or paper documents (including forms, letters and invoices), face-to-face meetings and interviews, emails and telephone calls;
- through financial transactions;
- from the School's website using various technologies, including 'cookies';
- online tools (including apps or other software used by the School);
- photographs, video or other recordings;
- polls, surveys and/or questionnaires;
- from other parties (such as education agencies, counsellors, medical practitioners or other schools) to enable the School to discharge its duty of care;
- from medical forms, incident reports, documents about occupational health and safety requirements (including capacity to work certificates), and the Teachers Registration Board of Tasmania, and Working with Vulnerable People clearance requirements, provided by the applicant, or any other third party authorised by the applicant;
- from other parties (such as recruiters, job applicants, representatives or referees, or social media sites); and
- from publicly available sources.

Collection of Personal Information Through CCTV

The School installs, uses and maintains CCTV cameras around the campuses in accordance with relevant surveillance laws. Where installed, CCTV cameras are appropriately signposted at all School entrances and exits, as well as in hallways and other open areas.

The School will only use or disclose CCTV footage in accordance with applicable legislation which includes the *Listening Devices Act 1991* (Tas), *Police Offences Act 1935* (Tas) and *Privacy Act 1988* (Cth) as necessary to:

- ensure the care, safety and welfare of staff and students;
- manage relationships between members of the School community (including staff, students, parents and alumni); and
- to protect the School's lawful interests in a legal or disciplinary proceeding.

The School will exercise discretion and will not:

- disclose CCTV footage to parents unless compelled by the relevant laws; or
- use or disclose records of private conversations or activities in situations where it is reasonably evident that the parties did not intend for the conversation or activity to be heard or observed by others.

Collection of Sensitive Information Through Facial Recognition Software

The School may use facial recognition software to identify students, staff and alumni in photos and videos. This will enable the School to ensure they have appropriate consent from all individuals before the photos or videos in question are shared or published. The biometric information used by the software will be regarded as 'sensitive information' under the Privacy Act. This data will be securely stored in accordance with this policy and accessible only to authorised school personnel.

How Does the School Use and Disclose Personal Information Collected?

As a general principle, and in accordance with statutory obligations, the School will only use and disclose personal information for:

- the primary purpose for which the information was collected;
- a secondary purpose that is related to the primary purpose and for which it would reasonably be expected for the School to use the collected information for;

- a secondary purpose that is directly related to the primary purpose where it is sensitive information; or
- as otherwise required or authorised by law, including the APPs.

The School will take reasonable steps to make individuals aware of the purpose for which the information collected may be used or disclosed, including by reference to this policy.

In particular, the School may disclose personal information to the following people, where appropriate:

- people providing educational, support and health services to the School (either on or off campus) including specialist visiting teachers, sports coaches, volunteers and counsellors;
- third-party service providers who provide online educational and assessment support services, document and data management services, training and support services, hosting services, software-as-a-service application, migration, administration, financial or educational services to the School;
- an approved schooling authority who manages the School's responsibilities under the *Australian Education Regulation 2023* and the *Australian Education Act 2013* (Cth) relating to students with a disability. The School is required to collect and disclose certain information to inform the Students with a Disability (SwD) loading via the Nationally Consistent Collection of Data on School Students with Disability (NCCD). The School provides the required information at an individual student level to 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;
- assessment and educational authorities, including the Department for Education, Children and Young People, the Australian Curriculum, Assessment and Reporting Authority (ACARA), the Office of the Tasmanian Assessment Standards and Certification (TASC), the Office of the Education Registrar (OER), the Office of the Independent Regulator (OIR) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- another school or staff at another school including The Hutchins School in connection with the Years 10/11/12 or other student programs);
- government departments (both state and federal such as the Department of Home Affairs);

- health service providers, such as counsellors, psychologists and School nursing services.
- third parties providing educational or pastoral care services;
- recipients of the School's publications, such as newsletters and magazines;
- students or parents and their emergency contacts;
- third parties to whom the School is authorised to disclose personal information;
- where authorised or required by law or court order, or other governmental order or process, such as where the School believes in good faith that the law compels the disclosure of information to:
 - lessen or prevent a serious threat to life, health or safety or public health or safety, where it is impractical to obtain consent;
 - take appropriate action in relation to suspected unlawful activity or serious misconduct;
 - to locate a person reported as missing;
 - to assert a legal or equitable claim; or
 - to conduct an alternative dispute resolution process; and
- where required to do so as a result of any obligations owed under a contract.

Information Sharing Schemes

The School is a prescribed organisation under both the Family Violence Information Sharing Scheme and the Child Information Sharing Scheme.

The Child Information Sharing Scheme operates under Schedule 2 of the *Child and Youth Safe Organisations Act 2023* (Tas). The Scheme allows organisations and services prescribed by regulation as information sharing entities to share confidential information to support child wellbeing or safety. The Scheme is designed to improve early identification of risks to children's safety and wellbeing, increase collaboration between services involved in supporting children and families, promote earlier and more effective intervention and integrated service provision, and improve outcomes for children and families.

The Family Violence Information Sharing Scheme operates under Part 5 of the *Family Violence Act 2004* (Tas). The Scheme allows organisations and services prescribed by regulation as information-sharing entities (key organisations and services) to share information related to assessing or managing family violence risk. The Scheme is designed to minimise the legislative barriers that had previously prevented the timely and effective sharing of information in cases of family violence.

Student Images and Videos

From time to time, the School may collect photographs and videos of students, including footage from the School's CCTV cameras. These photographs and videos may be displayed from time to time around the School and published in the School's publications. However, student images will only be used in school-related media and will not be sent to third parties (other than service providers) such as external media outlets without the express written permission of the parents, as provided during the enrolment process. With permission, a student image may be linked with the student's full name and will be included in marketing or promotional material, including on the School's website or social media accounts, with prior written consent.

Consent to the use of student images will be obtained from parents at enrolment, and during enrolment. Once granted, consent stands until such time it is changed during the School's consent renewal process, or expressly withdrawn in writing at other times. Due to complex challenges in managing the recording of any student images (e.g. at events), the School cannot accept partial consent and therefore consent will be treated as unequivocal. Any withdrawal of consent may affect a student's participation in certain school activities and will take effect from the time of withdrawal, and will not apply to any pre-existing collection, use or disclosure of a student's image or video.

Members of the school community acknowledge that even when authorisation is withheld that incidental, internal or unintentional use of images and recordings featuring that member (or a member's child) may still occur from time to time (particularly when a parent or child attends a photographed or recorded school-related activity or event).

Where reasonably practicable, the School will communicate before school-related activities or events about whether there will be any photography, livestreaming or recording of the event.

Third-party Service Providers

When the School engages third parties to provide products and/or services to the School, such as counsellors, psychologists, ICT Service providers and payment processors, such third parties may have access to personal information the school holds about individuals. The School does not authorise those third parties to use any personal information disclosed to or accessed by the third party for any purpose other than to facilitate the third party's completion of its obligations owed to the School.

Disclosure of Personal Information Overseas

The School may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or to enrol an international student. However, the School 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 and other applicable privacy legislations.

The School may use online or 'cloud' service providers to store or back up personal information and to provide services to the School 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 who 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 in countries like the United States of America, the United Kingdom and the European Union.

When communication occurs with the School through a social network service such as Facebook, Instagram or Twitter (X), the social network provider and its partners may collect and hold personal information overseas.

The School does not otherwise disclose or allow a third party located outside Australia to access the personal information the School holds.

Direct Marketing

Marketing and seeking donations is important for the future growth and development of the School to ensure that the School continues to provide a quality learning environment in which both students and staff thrive.

To opt out of receiving marketing material, [follow this link](#), or contact the School Risk and Compliance Manager (see below). If an individual opts out of receiving marketing material, the School may still otherwise contact them in relation to existing relationships other than for marketing.

Security and Retention of Personal Information

The School takes security seriously and takes reasonable steps to protect any personal information it holds from misuse, interference and loss. This includes:



- physical security measures such as locking cabinets and restricting access to employees in the School premises; and
- technology security measures such as employing passwords and multi-factor authentication measures to protect electronic records.

The School's staff are required to respect the confidentiality of students and parents' personal information and the privacy of all individuals who interact with the School.

The School also has in place an agreement with The Hutchins School in relation to the sharing of personal information as part of the Years 10/11/12 and other student programs and the ICT and accounts resource sharing arrangement between both schools. This agreement contains protections and obligations on both the School and The Hutchins School to ensure the security and confidentiality of any personal information shared between the Schools as part of these programs.

Retention Period

The School will hold personal information for as long as necessary to carry out its functions set out above or as otherwise required by law. The School takes reasonable steps to destroy or de-identify personal information where it is no longer needed for any purpose permitted by the APPs.

Consent and Rights of Access to the Personal Information of Students

The School respects every parent's right to make decisions concerning their child's education. Generally, the School will refer any requests to access a student's personal information to the student's parents. The School will treat consent given by parents to share personal information as consent given on behalf of the student (unless the student is considered to be a mature minor, in which case a student may give consent).

Parents may seek access to personal information held by the School about them or their child by contacting the School Risk and Compliance Manager (see below). However, there may be occasions when access is denied. Such occasions would include where the 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 School's duty of care to the student. The School also reserves the

right to verify the identity of the person requesting the information and their entitlement to access it.

The School may, at its discretion, on the request of a student grant that student access to information held by the School about them or allow a student to give or withhold consent to the use of their personal information, independently of their parents if they are deemed to be a mature minor.

Quality of the Personal Information Held

The School takes reasonable steps to ensure that the personal information collected, used and disclosed is accurate, complete and up-to-date. However, the accuracy, completeness and currency of the information held largely depends on the accuracy of the information supplied or collected.

If at any time it is discovered that any information held is inaccurate, out-of-date, incomplete, irrelevant or misleading, a correction request can be made by contacting the School Risk and Compliance Manager (below) by telephone or in writing.

The School reserves the right to verify identity before processing a correction request.

Supporting/Related Documents

This policy forms part of the School's broader governance and compliance framework. It must be read in conjunction with the following policies and procedures, which contain further mandatory requirements in relation to the collection, use, storage, disclosure and destruction of information:

[ICT Acceptable Use Policy](#)

[Data Retention Policy](#)

[Safeguarding Children policy](#)

[Safeguarding Practices and Behaviour Guidelines and Procedures](#)

Lodging a Complaint

To make a complaint to the School about how the School handles personal information, it is asked that the complaint be in writing to the School's Risk and Compliance Manager privacy@collegiate.tas.edu.au (see below).



The School will promptly acknowledge receipt and will respond within a reasonable time period (generally within 30 days). Where the complaint requires a more detailed investigation, the complaint may take longer to resolve, and the School will advise as to progress.

The School will investigate all complaints according to its [Grievance, Conflict and Complaint Policy and Procedure](#).

The School reserves the right to verify the identity of the individual making the complaint and to seek further information from the complainant about the circumstances of the complaint. The School reserves the right to refuse to investigate or to otherwise deal with a complaint where permitted under the Privacy Act. For example, the School may refuse to investigate or to otherwise deal with a complaint if The School considers the complaint to be vexatious or frivolous.

If an individual is not satisfied with the School's response to the complaint, an internal review can be requested. Following this, if the complainant is not satisfied with the outcome or it is considered that the School may have breached the Privacy Act or the Health Records Act, concerns can be raised with the Office of the Australian Information Commissioner (OAIC) or the Health Complaints Commissioner.

Office of the Australian Information Commissioner

Postal address: GPO Box 5288 Sydney NSW 2001

Phone: 1300 363 992

Email: foi@oaic.gov.au

Website: www.oaic.gov.au

Health Complaints Commissioner Tasmania

Postal address: GPO Box 960, Hobart, Tas 7001

Phone: 1800 001 170

Email: health.complaints@healthcomplaints.tas.gov.au

Website: <https://www.healthcomplaints.tas.gov.au>

Office of the Education Registrar

Postal address: GPO Box 104, Hobart, Tasmania, Australia 7001

Phone: 6165 6135 (South), 6777 2545 (North)

Email: registrar@oer.tas.gov.au

Website: www.oer.tas.gov.au

How to Contact the School

To enquire about this privacy policy or to make a complaint, please contact:

Risk and Compliance Manager

St Michael's Collegiate School

03 6211 4911 and privacy@collegiate.tas.edu.au

218 Macquarie Street

Hobart, Tas, 7000

Policy Review Details

Date	Version	Description of changes
August 2025	6	Addition of: <ul style="list-style-type: none">- Retention Period- Record Keeping- Supporting/related documents

Record Keeping

This policy is to be retained for a period of three (3) years, until its next scheduled review, unless legislative or organisational changes require an earlier review.

The most recent version of this policy is found on myCollegiate and The School's [Website](#).

Printed copies of this policy are considered uncontrolled and may not reflect the most current version.