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## 1. CONTEXT

Saint Ignatius' College Riverview (the College) is a Catholic, Jesuit boarding school for boys from Year 5 to Year 12. Situated on the beautiful Lane Cove River in Sydney NSW, it has an enrolment of over 1600 students. The College is conducted by the Society of Jesus and is part of a worldwide network of Jesuit schools and universities.

Established in 1880, the College is committed to an education for each student that proposes Christ as the model for human life by promoting the spiritual, academic, social, physical and experiential growth of its students.

The educational program at the College is dedicated to the holistic formation of the human person and does so through the pursuit of 'human excellence'. We seek to form, in companionship with parents, young men who are highly competent, committed, compassionate and with a developed conscience. We seek to form young men who are for and with others.

The purpose of the College policies and procedures is to provide a framework which ensures that the safety, individual care (*cura personalis*) and dignity of each person is paramount.

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## 2. PRINCIPLES

The College regards the privacy of all members of the community as paramount.

The College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 (Privacy Act). In relation to health records, the College is also bound by the NSW Health Privacy Principles which are contained in the Health Records and Information Privacy Act 2002 (NSW) (Health Records Act).

The College treats the handling of personal information of students, parents, employees and others in accordance with the 'Privacy Act' and 'Health Records Act'.

The College is fully committed to respecting all individuals, including adults and children both within the College and the wider community.

The College may, from time to time, review and update this Privacy Policy to take into account changes in laws, technologies, College operations and practices as well as to ensure appropriate contextual alignment.

This Policy is designed to be published on the College's public website, referenced in other mediums as appropriate, and used in the ongoing training of College Board members, staff, volunteers, contractors and third party and educational service providers.

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## 3. PURPOSE

This Policy provides the framework for:

- The development of College systems, practices, procedures and guidelines for privacy compliance.
- The circumstances in which the College collects personal information, how it uses that information and how the College manages requests to access and/or change that information.
- The training and awareness of privacy obligations and this policy.
- Compliance with laws, regulations and standards relevant to Privacy.

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## 4. SCOPE

This Policy applies to the management of personal information collected at all campuses of the College in the course of our operations, including that which is collected by solicited and unsolicited means, and is applicable to the management of any personal information which is held by the College.

This Policy applies to the College environment, which includes any campus of the College, virtual environments and other locations provided by the College or through a third-party provider in its activities. The Policy also applies to the College boarding environment. This Policy applies to all College employees (partners in mission), Jesuits, directors, students, parents, third party service providers, educational service providers, volunteers and contractors in connection with the College environment or College activities.

This policy is not applicable to information which is under the control of any third party to which the College provides personal information in accordance with this policy, except where the College has the right or power to deal with the information in the hands of the third party (for example, some technology service providers).

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## 5. PERSONAL INFORMATION

In this Privacy Policy, 'personal information' has the meaning set out in the Privacy Act. Under the Privacy Act, 'personal information' is information or an opinion about an identified individual or an individual who is reasonably identifiable. Common examples include a person's name, address, telephone number and date of birth. Some types of personal information are designated as 'sensitive information'. Sensitive information is subject to additional protection under the Privacy Act. For example, this can include information about a person's health, racial or ethnic origin, or membership of a trade union.

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## 6. EXCEPTION IN RELATION TO EMPLOYEE RECORDS

Under the Privacy Act and the Health Records Act, the Australian Privacy Principles and Health 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.

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## 7. COLLECTION 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 before, during and after the course of a student's enrolment at the College, including but not limited to:

- name, contact details (including next of kin and siblings), date of birth, gender, language background, previous school, parish details, religion and name and relationship of relatives who attended the College;
- parents' education, occupation and language background;
- financial and business information;
- medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
- results of assignments, tests and examinations;
- conduct and complaint records, or other behaviour notes, and appropriate pastoral records;
- information about referrals to government welfare agencies;

- counselling reports, accessed only through legal channels;
- health fund details and Medicare number;
- any court orders, parenting plans or other parenting access arrangements;
- volunteering information (including Working with Children Checks); and
- photos and videos at College events and on College premises, including footage from security systems located at the College.

Job applicants, staff members, volunteers and contractors, including but not limited to:

- name, contact details (including next of kin), date of birth, and religion;
- information on job application;
- professional development history;
- qualifications and education details;
- salary and payment information, including superannuation details and Tax File Number;
- 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;
- results of criminal background and working with children checks; and
- all emails, files and transactions processed by College information systems, including any email sent or received by a College-controlled email address and any files stored on College-issued computers or mobile devices, 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.

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## **8. PERSONAL INFORMATION YOU PROVIDE**

The College will generally collect personal information through a number of ways, including but not limited to:

- forms filled out by staff, students, and/or parents;
- in-person and over the phone, including interviews;
- interactions between College staff and students, for example in classroom and other learning environments;
- electronic means including emails and telephone calls;
- through College portals and other digital platforms;
- consent forms;
- written communication to the College;
- photographs, videos and recordings taken by or supplied to the College, including through any CCTV cameras located at the College; and
- in some circumstances, through authorised information sharing arrangements with other services.

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## **9. PERSONAL INFORMATION PROVIDED BY OTHER PEOPLE**

In some circumstances the College 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.

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## 10. PURPOSE AND USE OF PERSONAL 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. The College will otherwise use personal information where it has received the consent of the individual, where it is required or authorised by law, or otherwise in accordance with the Privacy Act.

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## 11. 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 and in some cases, before or after the time of their enrolment.

The purposes for which the College uses personal information of students and parents include but are not limited to:

- educating students
- providing for, protecting and accommodating a students' health and wellbeing including educational, social, emotional and medical wellbeing
- keeping parents informed about matters related to their child's education, through correspondence, newsletters and magazines and other forms of communication
- day-to-day administration of the College
- seeking donations and marketing for the College
- satisfying the College's legal obligations, including:
  - o meeting the College's duty of care to students, staff and visitors to the College
  - o making reasonable adjustments for students with disabilities in accordance with anti-discrimination law obligations
  - o providing, as far as reasonably practicable, College workplaces that are safe and free from risks to health and safety for workers and other people
- satisfying the College's administrative and regulatory requirements, and
- satisfying the requirements that apply due to its governance structure to The Australian Province of the Society of Jesus, The Society of Jesus in Australia Limited, and other related bodies corporate (including affiliated ministries and educational institutions).

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.

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## 12. PHOTOGRAPHS AND IMAGES OF STUDENTS

The College may use and disclose photographs, video, digital or other images ('images') of students for College educational and communication purposes and will seek annual consent for the use of these images which may be used in publications, newsletters or on digital platforms accessible by the College community. We may also use the images for marketing and/or fundraising purposes in publications, newsletters, or presentations to the public. Where students' images are prominently featured the College will seek separate specific consent from affected students' parents prior to each publication of

promotional material for the College or otherwise where we are making it available to the public such as on the Internet, including through Social Media.

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### **13. JOB APPLICANTS AND CONTRACTORS**

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

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

- administering the individual's employment or contract, as the case may be;
  - providing, as far as practicable, a safe workplace, including in relation to questions of fitness for duty, making adjustments for workers with disabilities, and discharging occupational health and safety and duty of care obligations to others;
  - for insurance purposes;
  - seeking donations and marketing for the College; and
  - satisfying the College's legal obligations, for example, in relation to its commitment to provide child safe environments.
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### **14. VOLUNTEERS**

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities. The purposes for which the College uses the personal information of volunteers include but are not limited to:

- enabling the College to manage the engagement process of volunteers;
  - for insurance purposes;
  - satisfying the College's legal obligations, including in relation to its commitment to provide child safe environments; and
  - to assess their suitability and to manage their presence on College premises and learning environments.
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### **15. COUNSELLORS**

The College contracts with external providers to provide counselling and/or psychology services for some students. The Principal may require the Counsellor and/or Psychologist to inform him or her or other staff of any issues the Principal or the Counsellor and/or Psychologist believe may be necessary for the College to know for the safety, wellbeing or development of the student who is counselled or other students at the College.

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### **16. 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 alumni organisation or, on occasions, external fundraising organisations.

On occasion, the College may use external companies to source publicly available information about the College community for the purposes of fundraising opportunities. As part of this process, the College may disclose personal information, including sensitive information to the external companies. Where

this information sharing occurs, the College will enter into specific privacy and confidentiality agreements with the external company to ensure that all information is gathered, stored and deleted in accordance with the Australian Privacy Principles.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, such as newsletters and magazines, which include personal information, may be used for marketing purposes.

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## **17. WEDDINGS AND BAPTISMS**

The College collects and holds personal information for weddings and baptisms conducted at the College through, but not limited to, the following forms:

- Notice of Intended Marriage;
- Declaration of No Legal Impediment to Marriage;
- Pre-Nuptial Enquiry Form;
- Marriage Booking Form; and
- Baptism Form.

This information is collected to assist the College in conducting weddings, baptisms, and related functions. It is recorded in the marriage and baptism registers and treated confidentially. However, the College is required to share these details with relevant agencies and organisations, including the Registry of Births, Deaths and Marriages and St Michael’s Parish Lane Cove.

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## **18. UNSOLICITED INFORMATION**

From time to time, the College may receive personal information without having solicited that information (e.g., misdirected postal or electronic mail). If this is the case and the College is authorised or required by law, it may keep this information. However, the College may destroy or de-identify the personal information when practicable, lawful and reasonable to do so.

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## **19. OTHER PERMITTED USE**

The College may also use personal information for other purposes where required or authorised by law.

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## **20. DISCLOSURE AND STORAGE OF PERSONAL INFORMATION**

The College may disclose personal information, including sensitive information, held about an individual for educational, administrative, marketing, fundraising, compliance and support purposes. This may include but is not limited to:

- The Society of Jesus, Jesuit Education Australasia Ltd, The Society of Jesus in Australia Limited and other related bodies corporate to satisfy the oversight requirements that apply to the College owing to its governance structure;
- other schools and teachers at those schools;
- federal and state government departments and agencies (including for policy and funding purposes);
- catholic schools agencies including the National Catholic Education Commission and Catholic Schools NSW Limited;
- health service providers including medical practitioners;
- people providing educational, support and health services to the College, including but not limited to specialist visiting teachers, coaches, volunteers, and counsellors;

- providers of specialist advisory services and assistance to the College, including in the area of Human Resources, child safeguarding and students with additional needs;
- providers of learning and assessment tools including online educational and assessment support services;
- providers of information technology services, software, applications and document and data management services, including to support the training of staff in the use of these services;
- assessment and educational authorities, including the Australian Curriculum, NSW Educations Standards Authority (NESA), Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
- other authorised agencies and organisations to enable the College to discharge its legal responsibilities, for example under the Australia Education Regulations 2013 (Regulation) and the Australia Education Act 2013 (Cth) relating to students with a disability, including Nationally Consistent Collection of Data (NCCD), quality assurance processes, participation in the Australian Early Development Census (AEDC) and government audits;
- entities affiliated with The Society of Jesus in Australia Limited in Rome and the Vatican City State for the limited purpose of ensuring that both Australian and canon (Church) law safeguarding requirements are met;
- authorised organisations and persons who support the College by providing consultative services or undertaking assessments for the purpose of educational programming or providers of health services such as counsellors, psychologists, College health services, or dental vans. Specific consent is obtained (except where otherwise required or permitted by law) to collect and disclose sensitive information, such as health information, as part of a service request which may include release of relevant medical or allied health reports and educational planning and evaluation documents such as personalised learning/behaviour/medical management plans;
- agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;
- people providing administrative and financial services to the College, including to support or enhance the educational or pastoral care services the College provides to its students or to facilitate communications with parents;
- people providing insurance and insurance services to the College;
- legal service providers and courts in the context of litigation and other legal claims;
- recipients of College publications, such as newsletters and magazines;
- students' parents and their emergency contacts;
- external fundraising and public domain information gathering organisations;
- anyone you authorise the College to disclose information to;
- authorised agencies and organisations to which we are required to disclose personal information for weddings and baptisms held at the College under the Marriage Act 1961 (Cth); and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection and information sharing laws.

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## 21. SENDING AND STORING INFORMATION OVERSEAS

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a College exchange, a student overseas tour. However, the College will not send personal information about an individual outside Australia without 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 which may be accessible by the parents. 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 may have the ability to access, monitor, use or disclose emails, communications, documents and associated 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 third-party services and where practical will endeavour to ensure personal information controlled by the College is located in countries with substantially similar protections as the Australian Privacy Principles.

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## **22. HANDLING SENSITIVE 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.

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## **23. QUALITY OF PERSONAL INFORMATION**

The College takes reasonable steps to ensure the personal information it collects, holds, uses and discloses is accurate, complete and current, including at the time of using or disclosing the information. Where a parent, alumni, employee or third party engaged by the College has changed personal information or otherwise believes the information held by the College may be inaccurate, updated information can be provided to the College through the relevant digital platform or other reasonable means of communications.

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## **24. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION**

The College takes reasonable steps to protect the personal information it holds from misuse, interference, loss and unauthorised access, modification or disclosure. The College recommends that all individuals, including parents and the College community, adopt secure practices to protect themselves. You should ensure that all your passwords are strong and regularly updated and that your log-in details are kept secure. You should 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 contact the College immediately.

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## **25. ACCESS AND UPDATE PERSONAL INFORMATION**

Under the 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.

To make a request to access or to update any personal information the College holds about you or your child, please contact the Principal by telephone or 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 (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons).

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## **26. CONSENT AND RIGHTS OF ACCESS TO PERSONAL INFORMATION**

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 by contacting the Principal by telephone or in writing.

However, there may be occasions when access is denied. Such occasions may 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.

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## **27. 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, manage its workforce 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 or complaint or providing feedback.

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## **28. RESPONDING TO DATA BREACHES**

The College will take appropriate, prompt action if it has 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 internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC). If unable to notify individuals, the College will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

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## **29. LOG DATA**

Like many website operators, the College collects information that a user's browser sends whenever it visits our website (Log Data).

This Log Data may include information such as a user's computer's Internet Protocol (IP) address, browser type, browser version, the pages of the College's website that a user visits, the time and date of his or her visit, the time spent on those pages and other statistics.

In addition, the College may use third party services such as Google Analytics (or similar web traffic analytic tools) that collects, monitors, analyses and records all visits to the College's website.

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### 30. ENQUIRIES AND COMPLAINTS

If you would like further information about the way the College manages the personal information it holds, please contact the Chief Risk Officer (Privacy Officer) by emailing [Privacy@riverview.nsw.edu.au](mailto:Privacy@riverview.nsw.edu.au).

The College takes seriously all complaints and procedures are in place to investigate and respond in a timely manner to any complaint made. Please refer to the Complaints Handling Policy and Procedure documents for further information regarding complaints. Certain incidents might be covered by the College's Whistleblower Policy.

If the individual is not satisfied with the College's decision, they may make a complaint to the Office of the Australian Information Commissioner (OAIC).

The Principal is responsible for ensuring that material breaches of this Policy and underlying policies, guidelines and procedures are escalated to the College's Risk & Compliance Subcommittee as soon as possible. A breach of this Policy by a staff member or contractor may lead to disciplinary action including possible termination of employment or appointment and/or referral to the appropriate authorities.

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### 31. DEFINITIONS AND ACRONYMS

<b>Parents</b>	In this document, "parent/s" includes carer/s and/or guardian/s.
<b>Sensitive Information</b>	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.

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### 32. RELATED POLICIES & SUPPORTING DOCUMENTS

<b>Related Legislation</b>	This Policy supports the College's compliance with the following legislation and instruments: <ul style="list-style-type: none"><li>- The Privacy Act (1988) and the Australian Privacy Principles (APPs)</li><li>- Health Records and Information Privacy Act 2002 (NSW)</li><li>- Privacy and Personal Information Protection Act 1998 (NSW)</li><li>- Children and Young Persons (Care and Protection) Act 1998 (NSW)</li><li>- Fair Work Act 2009 (Cth)</li><li>- Work Health and Safety Act 2011 (NSW)</li></ul>
<b>Related Policies</b>	The following policies of the College must be considered in relation to: <ul style="list-style-type: none"><li>- Enrolment Policy</li><li>- Complaints Handling Policy</li><li>- Child Safeguarding Policy</li><li>- CCTV Policy</li><li>- Learning Support for Students with Additional Learning Needs Policy</li><li>- Pastoral Care and Behaviour Management Policy</li><li>- Safe Use of Images Policy</li></ul>

	<ul style="list-style-type: none"> <li>- Students with Disabilities Policy</li> </ul>
<b>Related Procedures</b>	<ul style="list-style-type: none"> <li>- Complaints Handling Procedures</li> <li>- Counselling Manual</li> <li>- Work Health and Safety Statement</li> </ul>
<b>Related Documents</b>	<ul style="list-style-type: none"> <li>- Jesuit Province Code of Conduct</li> <li>- Privacy Collection Notice</li> </ul>

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### 33. DOCUMENT CONTROL

POLICY	Privacy Policy
RESPONSIBLE OFFICER	Chief Information Officer
CONTACT OFFICER	Chief Risk Officer (Privacy Officer)
APPROVED BY	Chair of the Board
VERSION NUMBER	6.0
SUPERSEDED VERSION NUMBER	5.0
EFFECTIVE DATE	13 August 2025
NEXT REVISION DATE	2026