



St Dominic's Priory College

# Privacy Policy

Last Review Date	Next Review Date
May 2026	May 2029 (or as required)
Responsible Officer	College Principal





## Our Mission

A Catholic College educating girls in the Dominican Tradition.

## Our Vision

Inspired by the Gospel of Jesus Christ, we are a girls' College committed to truth and compassion. In the spirit of St Dominic, we contemplate the possibilities and honour the sacred dignity of each person through word and action. We aspire to provide an innovative, rigorous and inclusive education that leads girls and young women to achieve excellence in their studies and confidence in their future.

## Our Values

As a Dominican community, we value:

- A sense of the sacred; joyful, eucharistic and reflective.
- A love of learning through creative and critical thinking.
- Modelling a eucharistic community as the basis of transformation.
- Teaching the truth, by word and example.

Further information about the College's principles and objectives can be found within the College Strategic Plan.

## Governance

St Dominic's Priory College is one of the education ministries of Dominican Education Australia (DEA). DEA has oversight of six schools and appoints for each a governing Board of Directors, which is incorporated under the *Corporations Act 2001 (Cwth)*. The Trustees of DEA and the College Board of Directors assure our Catholicity, fidelity to the Dominican Charism, formation of Board members, excellence in teaching and learning and financial stability. The Principal is the Chief Executive Officer of the College and is accountable to the Board for its internal administration and management.

For more information about DEA visit: <https://dominicaneducationaustralia.com/>

## Child Safe

We are a Child Safe employer and are committed to the welfare and protection of children and young people. The College is committed to upholding a diverse and inclusive learning environment, ensuring children and young people are valued and respected. In accordance with the National Catholic Safeguarding Standards, all employees are required to comply with the College's relevant policies and procedures.

To read the College's **Safeguarding Commitment Statement** in full, and access *College Policies, Procedures* and other resources, please visit the College website.



## 1. Purpose and Commitment

- 1.1 St Dominic's Priory College ("the College") respects the privacy of all members of its community and is committed to protecting personal information in accordance with applicable privacy law.
- 1.2 The College is bound by the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (APPs), which govern how personal information is collected, used, disclosed, stored, accessed and corrected.
- 1.3 This Policy explains:
  - 1.3.a The types of personal information the College collects and holds
  - 1.3.b How the College collects and holds that information
  - 1.3.c The purposes for which the College uses and discloses that information
  - 1.3.d How an individual may access and seek correction of their personal information
  - 1.3.e How complaints about privacy may be made and managed
  - 1.3.f Whether the College is likely to disclose personal information overseas.
- 1.4 Our College, inspired by the Dominican values of truth, respect, and service, is committed to protecting the personal information we hold and being transparent about how we use it.

## 2. What is Personal Information?

- 2.1 "Personal information" means information, or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in material form or not.
- 2.2 The College may also collect personal information that is considered "sensitive information" under the *Privacy Act 1988 (Cth)*, where reasonably necessary and lawful to do so. Sensitive information may include:
  - 2.2.a Health and medical information
  - 2.2.b Disability and learning support information
  - 2.2.c Religious affiliation
  - 2.2.d Racial or ethnic origin (where relevant to College operations or legal obligations)
  - 2.2.e Biometric or photographic information
  - 2.2.f Criminal history or screening clearances where required for employment, volunteering, or child safety purposes.



### 3. What Information the College collects

Examples of personal information the College may collect include:

#### 3.1 Students and Families:

- 3.1.a Names, addresses, contact details, and family relationships
- 3.1.b Date of birth and demographic information
- 3.1.c Enrolment history and academic records
- 3.1.d Wellbeing, pastoral and behavioural records
- 3.1.e Attendance and participation records
- 3.1.f Health, medical, allergy and emergency information
- 3.1.g Learning support, accessibility and adjustment information
- 3.1.h Photographs, video and audio recordings
- 3.1.i Family court orders, parenting arrangements, or legal restrictions where applicable.

#### 3.2 Staff, Volunteers and Contractors:

- 3.2.a Names, date of birth, address, contact details and employment records (including working visas, if applicable, and referee statements)
- 3.2.b Qualifications, registrations and professional history
- 3.2.c Screening clearances, Working With Children (WWC) and police checks where required
- 3.2.d Payroll, statement(s) of service, superannuation, taxation and banking details
- 3.2.e Leave, medical certificates, performance, training and professional development records
- 3.2.f Work capacity certificates or workplace adjustment information, where relevant.

#### 3.3 Alumni, Donors and Community Members:

- 3.3.a Names and contact details
- 3.3.b Records of engagement with the College
- 3.3.c Event attendance
- 3.3.d Donation or philanthropic records
- 3.3.e Historical connection to the College community.



#### 4. How We Collect Personal Information

- 4.1 The College generally collects personal information **directly from the individual** or, in the case of students, from their parent(s)/guardian(s) (referred to as '**parents**' for convenience).
- 4.2 Personal information may be collected through:
- 4.2.a Enrolment applications and supporting documents
  - 4.2.b Interviews, meetings and conversations
  - 4.2.c Forms, surveys and consent processes
  - 4.2.d Email, phone and written correspondence
  - 4.2.e College websites, online platforms, portals and digital systems
  - 4.2.f Excursions, camps, sporting and co-curricular registrations
  - 4.2.g Employment applications and recruitment processes
  - 4.2.h CCTV, access control and security systems
  - 4.2.i Photographs, video and recordings at College activities or events.
- 4.3 The College may also collect personal information from **third parties** where lawful and appropriate, including:
- 4.3.a Previous schools or education providers
  - 4.3.b Government agencies and statutory authorities
  - 4.3.c Medical or allied health professionals
  - 4.3.d Referees
  - 4.3.e Child protection, safeguarding or regulatory bodies
  - 4.3.f Service providers acting on behalf of the College
  - 4.3.g Publicly available sources
  - 4.3.g Previous employers, Catholic Education South Australia (CESA).
- 4.4 Where reasonable and practicable, the College will collect information directly and with consent. If the College is unable to collect certain personal information, it may not be able to enrol a student, provide educational services, employ or engage a person, or meet legal obligations.
- 4.5 Where the College receives **unsolicited personal information**, it will determine whether it could have lawfully collected that information. If not, and if lawful to do so, the information will be destroyed or de-identified.



## 5. Why We Collect, Hold and Use Personal Information

The College collects, holds and uses personal information where reasonably necessary for its functions and activities, including for:

### 5.1 Educational and Pastoral Purposes.

These include to:

- 5.1.a Enrol, educate and support students
- 5.1.b Assess and report on learning and progress
- 5.1.c Provide wellbeing, pastoral care and spiritual formation
- 5.1.d Manage co-curricular, sporting, service and leadership programs
- 5.1.e Respond to student safety, health and welfare needs.

### 5.2 Duty of Care and Safeguarding.

These include to:

- 5.2.a Meet child safety and safeguarding obligations
- 5.2.b Protect students, staff and visitors
- 5.2.c Respond to incidents, complaints, disclosures or emergencies
- 5.2.d Manage health, medical and risk matters.

### 5.3 Administration and Operations

These include to:

- 5.3.a Communicate with families, carers, students and staff
- 5.3.b Manage current and archived records, administration, finance and billing
- 5.3.c Administer employment and contractor arrangements
- 5.3.d Support College governance and strategic operations
- 5.3.e Manage ICT systems, platforms and access.

### 5.4 Legal and Regulatory Compliance

These include to:

- 5.4.a Comply with Commonwealth and State legislation
- 5.4.b Meet reporting and regulatory requirements
- 5.4.c Manage insurance, legal claims and investigations
- 5.4.d Respond to lawful requests from courts, regulators or government bodies.



## 5.5 Community Engagement

These include to:

- 5.5.a Communicate with alumni and community members
- 5.5.b Support College events, advancement, development and fundraising
- 5.5.c Celebrate student learning, community life and College history
- 5.5.d Publish news, achievements and College stories where consent or lawful authority exists.

## 6. Disclosure of Personal Information

6.1 The College will only disclose information:

- 6.1.a For the purpose for which it was collected
- 6.1.b For a directly related purpose and where permitted
- 6.1.c With consent
- 6.1.d Where required or authorised by law
- 6.1.e Where necessary to lessen or prevent a serious threat to life, health, safety or welfare
- 6.1.f Where otherwise permitted under the *Privacy Act 1988 (Cth)*.

6.2 The College may disclose personal information to:

- 6.2.a Parents, guardians, and authorised family contacts where appropriate
- 6.2.b Dominican Education Australia (DEA), the College Board, and associated governance structures where required
- 6.2.c Government departments and regulatory authorities
- 6.2.d Catholic Education South Australia (CESA) or sector bodies where relevant
- 6.2.e Medical practitioners, psychologists, counsellors and allied health professionals
- 6.2.f External service providers including IT, software, legal, audit, finance, communications, records management, cyber security and insurance providers
- 6.2.g Visiting professionals, coaches, tutors, and contractors engaged by the College
- 6.2.h Emergency services, child protection authorities or law enforcement where required or appropriate
- 6.2.i Alumni, advancement or fundraising service providers, where relevant and lawful.



- 6.3 The College takes reasonable steps to ensure that third-party providers handling personal information on its behalf are subject to appropriate privacy, confidentiality and security obligations.

## 7 Overseas Disclosure

- 7.1 Some of the College's digital systems, software providers, cloud platforms or communication tools may store or process personal information in **overseas jurisdictions**.
- 7.2 This may occur, for example, where the College uses:
- 7.2.a Learning management systems
  - 7.2.b Cloud storage or communication platforms
  - 7.2.c Student management systems
  - 7.2.d Online survey or registration tools
  - 7.2.e Website, analytics, media or marketing platforms.
- 7.3 Where the College discloses personal information overseas, it will take reasonable steps to ensure that overseas recipients handle the information in a manner consistent with Australian privacy standards.

## 8 Storage, Security, and Retention

- 8.1 The College stores personal information in both **digital and physical formats**.
- 8.2 The College takes reasonable administrative, technical and physical measures to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. These measures may include:
- 8.2.a Role-based and limited-access permissions
  - 8.2.b Password protection and multi-factor authentication
  - 8.2.c Secure storage and locked physical files
  - 8.2.d Confidentiality obligations for staff and contractors
  - 8.2.e Cybersecurity protections and monitoring
  - 8.2.f Secure destruction or de-identification when information is no longer required.
- 8.3 The College retains records for as long as required to fulfill its educational, legal, administrative, safeguarding and archival obligations.



- 8.4 When personal information is no longer required, and the College is lawfully able to do so, it will securely destroy, dispose of, or de-identify that information.

## 9. Data Breaches

- 9.1 The College manages actual or suspected privacy incidents and data breaches in accordance with its *Data Breach Policy* and *Data Breach Response Plan*.
- 9.2 Where the College becomes aware of an eligible data breach (as defined by the OIAC), likely to result in serious harm, it will comply with its obligations under the **Notifiable Data Breaches Scheme**, including notification to affected individuals and the [Office of the Australian Information Commissioner \(OAIC\)](#), where required.

## 10. Access and Correction

- 10.1 Individuals may request access to personal information the College holds about them, and may request correction of inaccurate, incomplete, out-of-date, irrelevant or misleading information.
- 10.2 Requests for access or correction should be made in writing to the College Principal or delegate.
- 10.3 The College will respond to requests within a reasonable timeframe (30 days) and, where applicable, in accordance with the *Privacy Act 1988 (Cth)* and any other relevant legislation.
- 10.4 Access may be refused or limited in some circumstances permitted by law, including where access would unreasonably impact the privacy of others, prejudice legal proceedings, or pose a serious threat to health, safety or welfare.
- 10.5 The College may require proof of identity before granting access to personal information.

## 11. Students, Parents and Consent

- 11.1 The College generally relies on the authority of parents to provide personal information and consent on behalf of a student.
- 11.2 As students mature, the College may, where appropriate and lawful, seek consent directly from the student or recognise the student's right to make decisions about their own personal information; taking into account their age, maturity, best interests, and the nature of the matter.



- 11.3 The College will manage privacy, consent and disclosure issues in a manner consistent with child safety, pastoral care, legal obligations and the educational context of the College.

## 12. CCTV, Monitoring and College Systems

- 12.1 The College uses CCTV and related security systems for lawful purposes including:
  - 12.1.a Protecting students, staff, visitors and property
  - 12.1.b Supporting child safety and safeguarding
  - 12.1.c Assisting in the investigation of incidents or complaints
  - 12.1.d Maintaining site security and operational oversight.
- 12.2 CCTV footage is securely stored and accessed only by authorised persons for legitimate purposes.
- 12.3 The College also uses a range of digital platforms and systems to support learning, communication, administration, wellbeing and operations. These systems may collect and store personal information as part of ordinary College activity.

## 13. Websites, Digital Platforms, and Analytics

- 13.1 When individuals visit the College website or interact with College digital platforms, some information may be collected automatically, including:
  - 13.1.a IP address
  - 13.1.b Browser or device type
  - 13.1.c Pages visited
  - 13.1.d Date and time of access
  - 13.1.e Referring websites or links.
- 13.2 The College may use website analytics, cookies and third-party digital tools to improve website performance, communications and user experience.
- 13.3 Where individuals complete online forms, register for events, subscribe to updates, or contact the College electronically, the information provided may be collected and retained for the relevant purpose.



## 14. Marketing, Media, Publications and Fundraising

- 14.1 The College may use names, photographs, video, audio, student work, achievements, and community stories in:
- 14.1.a News articles
  - 14.1.b Yearbooks and magazines
  - 14.1.c Social media
  - 14.1.d The College website
  - 14.1.e Marketing and promotional materials
  - 14.1.f Fundraising and advancement publications.
- 14.2 The College will seek and manage media and publication consent through its enrolment and consent processes, or otherwise as required.
- 14.3 The College recognises emerging privacy and safeguarding risks associated with Artificial Intelligence (AI)-enabled image manipulation, scraping, impersonation and deepfake technologies, and will take reasonable steps to minimise these risks by amending how images and media are captured, stored and published.
- 14.4 Individuals may request not to receive marketing, fundraising or promotional communications at any time.

## 15. Anonymity and Pseudonymity

- 15.1 Where lawful and practicable, individuals may have the option of dealing with the College anonymously or by using a pseudonym.
- 15.2 However, in school-related contexts, this will not be practicable because the College must identify individuals to provide education, ensure child safety, manage legal obligations, and deliver services.

## 16. Complaints and Enquiries

- 16.1 If an individual has a concern or complaint about how the College has handled personal information, they should contact the College in the first instance, in line with the *College Grievance Policy*.
- 16.2 Privacy complaints and enquiries should be directed to:
- College Principal**  
St Dominic's Priory College  
Email: [principal@stdominics.sa.edu.au](mailto:principal@stdominics.sa.edu.au)  
Phone: (08) 8331 5100



- 16.3 The College will seek to investigate and respond to privacy complaints in a fair and timely manner.
- 16.4 If an individual is not satisfied with the College's response, they may make a complaint to the [Office of the Australian Information Commissioner \(OAIC\)](#).

## 17. Related Legislation and Documents

### LEGISLATION

*Privacy Act 1988 (Cth)*

*Australian Privacy Principles*

*Privacy and Other Legislation Amendment Act 2024 (Cth)* (where applicable)

*Child Safety (Prohibited Persons) Act 2016*

*Child Safety (Prohibited Persons) Regulations 2019*

*Child and Young People (Safety) Act 2017 (SA)* (where relevant)

*Education and Children's Services Act 2019 (SA)* (where relevant)

*Teachers Registration and Standards Act 2004*

Any other applicable Commonwealth or State legislation.

### RELATED COLLEGE DOCUMENTS

St Dominic's Priory College Archives Policy

St Dominic's Priory College Artificial Intelligence (AI) Use Policy

St Dominic's Priory College CCTV and Audio Surveillance Policy

St Dominic's Priory College Communications Policy

St Dominic's Priory College Data Breach Policy

St Dominic's Priory College Data Breach Response Plan

St Dominic's Priory College Deepfake Crisis Response Plan

St Dominic's Priory College Enrolments Policy

St Dominic's Priory College Grievance Policies (Staff *and* Students/Community)

St Dominic's Priory College Records Management Policy

St Dominic's Priory College Safeguarding Commitment Statement

St Dominic's Priory College Volunteer Information Package

St Dominic's Priory College Whistleblower Policy

### 18. Policy Review and Publication

- 18.1 This policy will be reviewed every **three years**, or earlier if required due to legislative, regulatory, operational or technological change.
- 18.2 The current version of this Policy will be made available on the College website and through appropriate internal College platforms.

### 19. Revision Record

Document Title	<b>Privacy Policy</b>					
Document Type	Policy					
Document Date	25 May 2026					
Process Owner	College Principal	Helen Steele ( <a href="mailto:hsteele@stdominic.sa.edu.au">hsteele@stdominic.sa.edu.au</a> )				
Approval Authority	College Board					
Review Date	May 2029 (or earlier as required)					
Distribution	Website	<input checked="" type="checkbox"/>	SEQTA	<input checked="" type="checkbox"/>	Sharepoint	<input checked="" type="checkbox"/>
History	Edition	Date	Description of change			
	1.0	2026	Consolidated and updated policy drafted			