

# Collection Notice



## St. Mary's Primary School Hampton

1. The School collects personal information, including sensitive information about students and parents or guardians and family members before and during the course of a student's enrolment at the School. This may be in writing, digitally or in the course of conversations and may be direct from the individual or from another source. The primary purpose of collecting this information is to enable the School, Catholic Education Offices and the Catholic Education Commission of Victoria Ltd (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 the School collects 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 (which includes information about any disability as defined by the *Disability Discrimination Act 1992*) is sensitive information within the terms of the Australian Privacy Principles (APPs) under the *Privacy Act 1988*. The School may require medical reports about students from time to time and may otherwise collect sensitive information about students and their families.
5. If any personal information requested by the School is not provided, this may affect the School's ability to enrol a student, respond to enquiries, provide the student with educational and support services or allow a person to visit the School.
6. The School may disclose personal and sensitive information for **administrative, educational and support purposes** (or may permit the information to be directly collected by third parties). This may include to:
  - School service providers such as the CECV, Catholic Education Offices, school governing bodies and other dioceses
  - third party service providers that provide online educational and assessment support services or applications (apps) \*, which may include email and instant messaging
  - School systems, including the Integrated Catholic Online Network (ICON) and Google's 'G Suite' including Gmail. Limited personal information^ may be collected and processed or stored by these providers in connection with these services
  - CECV and Catholic Education Offices to discharge its responsibilities under the *Australian Education Regulation 2013* (Regulation) and the *Australian Education Act 2013* (Cth) (AE Act)

relating to students with a disability, including ongoing evaluation of funding adequacy for individual students

- CECV to support the training of selected staff in the use of schools' systems, such as ICON
- another school to facilitate the transfer of a student
- Federal and State government departments and agencies acting on behalf of the government e.g. for audit purposes
- health service providers, and people providing educational support and health services to the School, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority
- people providing administrative and financial services to the School
- anyone you authorise the School to disclose information to; and
- anyone to whom the School is required or authorised to disclose the information to by law, including under child protection laws.

7. The school is required by the Federal *Australian Education Regulation (2013)* and *Australian Education Act 2013* (Cth) (AE Act) to collect and disclose certain information under the *Nationally Consistent Collection of Data* (NCCD) on students with a disability. The school provides the required information at an individual student level to the Catholic Education Offices and the CECV, as an approved authority. Approved authorities must comply with reporting, record keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.
8. Personal information collected from students is regularly disclosed to their parents or guardians.
9. The School may also use cloud computing service providers to store personal information (which may include sensitive information) on their servers in the 'cloud'. These servers may be located in or outside Australia. This may mean that personal information may be stored or processed outside Australia. \*\*
10. The School makes reasonable efforts to be satisfied about the protection of any personal information that may be collected, processed and stored outside Australia in connection with any cloud and third party services and will endeavour to ensure it will be located in countries with substantially similar protections as the APPs.
11. The School's Privacy Policy contains further information about its use of cloud and other third party service providers and any of their overseas locations.
12. Where personal, including sensitive information is held by a cloud computing service provider on behalf of CECV for educational and administrative purposes, it may be stored on servers located within or outside Australia.
13. School personnel and the school's service providers, and the CECV and its 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 ICON system and ensuring its proper use.

14. The School may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising.
15. 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, and correction of their personal information which the School has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, or may result in a breach of the School's duty of care to the student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
16. The School's Privacy Policy also sets out how parents, guardians, students and their family can make a complaint if they believe the School has interfered with their privacy [and how the complaint will be handled].
17. 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.
18. On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and marketing material, 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 from the student's parent or guardian (and from the student if appropriate) prior to publication to enable the school 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. The school may obtain permissions annually, or as part of the enrolment process. Permissions obtained at enrolment may apply for the duration of the student's enrolment at the school unless the school is notified otherwise. Annually, the school will remind parents and guardians to notify the school if they wish to vary the permissions previously provided. We may include students' and parents' or guardians' contact details in a class list and School directory.
19. If you provide the School with the personal information of others, such as other family members, doctors or emergency contacts, we encourage you to inform them you are disclosing that information to the School and why, that they can request access to and correction of that information if they wish and to also refer them to the School's Privacy Policy for further details about such requests and how the School otherwise handles personal information it collects and complaints it receives.

\* Apps (or applications) used by the school include G Suite, Hapara, Care Monkey, SAS, nForma, Essential Assessment, Acer Progressive Achievement Tests (PAT), Class Dojo

\*\* A comprehensive list of current data processing and storage as at the date of publication of the collection notice can be found in the Appendix of this document.

^St Mary's Hampton also stores other information such as personalised learning plans, stored as per the NCCD standards outlined in Clause 7.

## **Appendices:**

### **Appendix 1:**

St Mary's Hampton is passionate about adhering to a high standard of student safety and security. Subsequently it is the responsibility of the school to ensure that third-party services employed by St Mary's Hampton are reliable and comply to the high standard of Australian privacy laws. This section aims to outline the location and nature of information collected and stored by St Mary's current third party providers used by the school in order to enable the school to meet its educational, administrative, and duty of care responsibilities to the student to enable them to take part in all the activities of St Mary's Hampton. The extensive Australian Privacy Principles can be found at <https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/>

**G Suite:** G Suite is the Google LLC suite of software including Google Drive, Gmail etc, used by staff and students of St Mary's Hampton for document and communication creation and management. G Suite data is transferred and stored in the United States and other countries through which Google provides storage services, all G suite services are pursuant to EU and US privacy standards and are ISO certified.

The full G Suite privacy policy can be viewed at:

[https://gsuite.google.com.au/intl/en\\_au/security/](https://gsuite.google.com.au/intl/en_au/security/)

**Hapara:** Hapara is software used for sharing learning content and managing student device usage for students and staff at St Mary's Hampton. On account of being a G suite related service, Hapara data is transferred and stored in the United States, all Hapara services are pursuant to EU and US privacy standards and have an ongoing commitment to the Privacy Shield and Student Privacy Pledge programs.

The full Hapara privacy policy can be viewed at:

<https://hapara.com/privacy-policy/>

**Care Monkey:** Care Monkey is a communication and management software for health and contact information for families of St Mary's. Data stored by Care Monkey is stored in Australia by local servers and is managed in servers based in Australia, and adheres to the Australian Privacy Principles. Some data stored by Care Monkey is classified as Sensitive information and is stored and managed pursuant to the Australian Privacy Act 1989 Cth, Data Protection Act 1988.

The full Care Monkey privacy policy can be viewed at:

<https://www.caremonkey.com/privacy/>

#### SAS2000:

SAS2000 is a platform used to coordinate and manage a range of administrative and financial data for families of St Mary's. SAS2000 software is managed and controlled by the Tribal Group. Tribal Group International have data stored globally. All internal and external data storage and transfers made by Tribal Group adhere to EU General Data Protection Regulation

The full SAS2000 privacy policy can be viewed at:

<https://www.tribalgroup.com/privacy-policy>

#### nForma:

Nforma is software used to manage attendance, wellbeing and reporting data for students of St Mary's Hampton. NForma is owned and managed by Clarisse Enterprises, which is based in Australia. User data is managed and controlled within Australia and practices comply with the Australian Privacy Principles, Health Privacy Principles and Privacy act (1988).

The full nForma privacy policy can be viewed at:

<https://www.cepl.com.au/wp-content/uploads/2018/08/CEPL-Privacy-Policy-and-Collection-Notice.pdf>

#### Essential Assessment:

Essential Assessment is a software platform used to administer and manage student performance data for students of St Mary's. Essential Assessment is an Australian company owned and operated locally. All data collected is stored locally in Australia within Digital Pacific servers adherent to the Australian Privacy Principles and Privacy act (1988)

The full Essential Assessment privacy policy can be viewed at:

<https://www.essentialassessment.com.au/privacy/>

#### Australian Council for Educational Research (ACER):

ACER's PAT is a software platform used to administer and manage student performance data for students of St Mary's Hampton. PAT is an Australian company owned and operated locally, and is partnered with UNESCO. The ACER Privacy Policy does not specify geographical locations or names of third party providers used, data storage location is unknown.

The full ACER privacy policy can be viewed at:

<https://www.acer.org/privacy>

### Class Dojo

Class Dojo is a blogging and classroom management tool used by teachers, students and parents of St Mary's Hampton. Class Dojo is an American company, operated out of the United States and Class Dojo data is transferred and stored in the United States. All Class Dojo services are pursuant to US privacy standards and have an ongoing commitment to student privacy. Further information about Class Dojo Privacy standards can be found in Appendix 2.

The full Class Dojo privacy policy and related documents can be viewed at:

<https://www.classdojo.com/privacy/>

## Appendix 2:

### **Class Dojo**

### **PRIVACY HIGHLIGHTS**

## **INTRODUCTION**

We believe that the safety and wellbeing of students is a whole school responsibility. With the introduction of any new software to the school community it is important that measures are taken to ensure that any platform used conforms to Privacy Standards as stringent as the Australian Privacy Policy (1988) and the Australian Privacy Principles. This document aims to outline the highlights of the current Class Dojo privacy policy as at August 2018. Privacy policies are expected to change and should be reviewed regularly by users.

### **1. Data Storage**

Class Dojo do not use or disclose information collected through Cookies or similar technologies for third-party advertising purposes (including behaviorally targeting of advertising to students). Class Dojo uses a range of reputable cloud providers including Google Analytics to store shared information such as views, access times, and page views. Student portfolios are private to the classroom and those invited to view them by the School. Class Dojo have an ongoing commitment to the latest security best practices to keep users protected at all times, and communicate changes in privacy practices to users. Data is stored on Amazon Web Services and MLab servers in the U.S.; back-ups are in the same locations (AWS/MLab in the U.S.); additional Class Dojo services such as Zendesk and SurveyMonkey are managed in the U.S.

### **2. Ownership of Information**

Content contributed to Class Dojo remains the property of the individual poster, and does not belong to ClassDojo.

### 3. Data Types

ClassDojo collects only the minimal amount of information about students needed to sign up for the service, the use of full names on Class Dojo is optional, and teachers at St Mary's Hampton are encouraged to opt for first-name only usage. Students are never asked for information such as gender, email, address, or student ID. No GDPR specified Special Category data is collected by Class Dojo. Information requested of students in order to use Class Dojo for Student Portfolios is consistent with the Children's Online Privacy Protection Act (COPPA).

Feedback data (such as points earned for meeting expectations) is managed by individual class teachers and is not shared with the wider St Mary's Hampton school community. Feedback data is erased by Class Dojo administration after 12 months for each archived student.

An extensive list of the data types collected by Class Dojo and storage/use of such data can be found at <https://www.classdojo.com/data/>

### 4. Compliance

Class Dojo maintains compliance to COPPA, The Family Educational Rights and Privacy Act (FERPA), and General Data Protection Regulation (GDPR). Fact sheets for each can be found below:

<https://static.classdojo.com/docs/TeacherResources/FERPAPrimer/FERPAPrimer.pdf>

[https://static.classdojo.com/docs/ClassDojo\\_GDPR\\_fact\\_sheet.pdf](https://static.classdojo.com/docs/ClassDojo_GDPR_fact_sheet.pdf)