



Lumen Christi College

Privacy

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Review History:

<i>Year of Review</i>	<i>Reviewed by</i>	<i>Amendments/Review</i>
2008	Principal	Originally Released
2010	Principal	Amended
2013	Executive Leadership Team	Amended
2014	Executive Leadership Team	Amended

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<i>Year</i>	<i>Responsibility</i>
2021	Executive Leadership Team

Lumen Christi College Privacy

Introduction:

Lumen Christi College requires personal information about students and their families in order to provide for the education of these students. The College believes that the privacy of all individuals is important and all personal and sensitive information held by the College is properly secured and stored.

The Privacy Compliance Manual

This Policy has been developed in consultation with, and should be read with reference to, the National Catholic Education Commission and National Council of Independent Schools' Associations Privacy Compliance Manual (the Manual), prepared to be used by schools and systems which are represented by the Catholic Education Commission of Western Australia (CECWA) through the National Catholic Education Commission, and by schools which are members of an association of Independent Schools.

The National Catholic Education Commission and National Council of Independent Schools' Associations Privacy Compliance Manual 2013 supersedes the Privacy Compliance Manual which was first published in 2001 and updated in 2004, 2007 and 2010. It contains some substantial changes which were required by the introduction of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and also other amendments to reflect changes in other legislation and to improve the Manual generally.

While compliance with privacy obligations has always been important, it is essential to be aware that amendments to the legislation now introduce substantial penalties for serious or repeated interferences with privacy and provide the Privacy Commissioner with the power to seek enforceable undertakings. This is quite apart from the reputational damage that a school may suffer if the privacy of an individual is breached.

The purpose of the Manual is to provide assistance and guidance to non-government schools corresponding with the new requirements they must observe in relation to the preservation of an individual's privacy. Your particular attention is drawn to Section 6 of this Manual which summarises what a school must do to comply with the new legislative requirements.

The preparation of this Manual has been funded by the Associations of Independent Schools and Catholic Education Commissions in each Australian State and Territory. The previous Manual should be discarded to ensure that only the current Manual is used.

Rationale:

The Catholic school is a reflection of the Church's commitment to the dignity of the individual.
(*Mandate para 6*)

It is important for schools to demonstrate this commitment in the manner in which they protect information that they hold about their school community. The Catholic school requires information about students and their families in order to provide for the education of these students.

The *Privacy Act 1988* directs the manner in which private sector organisations, including Catholic schools and systems, manage the personal and sensitive information of individuals.

The purpose of the legislation is to ensure that organisations, which hold information about individuals, handle that information responsibly. It aims to establish a nationally consistent approach to the management of personal information.

Definitions:

The following types of information are covered by the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection Act 2012):

'Australian Privacy Principles' (APPs). A key component of the legislation is the mandatory requirement for a school to comply with the APPs. The APPs set minimum standards which relate to the collection, security, storage, use, correction and disclosure of personal information and access to that information. The APPs are summarised individually throughout the Manual and briefly summarised in *Appendix 1* of this document.

'Personal' information means information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not, and whether the information is recorded in a material form or not. It includes all personal information regardless of its source.

In other words, if the information or opinion identifies an individual or allows an individual to be identified it will be 'personal information' within the meaning of the Privacy Act. It can range from very detailed information, such as medical records, to other less obvious types of identifying information, such as an email address. This definition is wider than the definition prior to the Amending Act, but is unlikely to practically change the approach schools have taken in the past.

Personal information does not include information that has been de-identified so that the individual is no longer identifiable either from the information or from the information when combined with other information reasonably available to the College. Examples of de-identification techniques include removing identifiers, using pseudonyms and using aggregated data. Where practicable, schools should use de-identified information.

The Australian Privacy Principles (APPs) apply to the collection of personal information by a school for inclusion in a record or a generally available publication, but apart from this, the APPs only apply to personal information a school has collected that it holds in a record.

'Sensitive' information is a type of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information and biometric information.

'Health' information is a subset of sensitive information. It is any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided, currently or in the future, to an individual that is also personal information. Health information also includes personal information collected in the course of providing a health service.

The Privacy Act regulates personal information contained in a 'Record'. A 'Record' includes a 'Document' or an 'Electronic or other device'. The definition in the Amending Act is inclusive and therefore now covers a wide variety of material which might constitute a record. A 'Document' is defined to include anything on which there is writing, anything from which sounds, images or writings can be reproduced, drawings or photographs. There are some items which are excluded* from the definition of 'Record'. The exclusions relevant to a school are:

- A generally available publication e.g. a telephone directory.
- Anything kept in a library, art gallery or museum for the purposes of reference, study or exhibition.

* The effect of these exclusions are discussed at Paragraphs 20.6 to 20.9 in the National Catholic Education Commission and National Council of Independent Schools' Associations Privacy Compliance Manual.

Principles:

Schools have a responsibility to use and manage personal and sensitive information collected by them in accordance with the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Schools have a responsibility to inform individuals of the purpose of collecting personal and sensitive information. All information is collected for the primary purpose of the Catholic education of the student.

Procedures:

Lumen Christi College considers that the privacy of individuals is important. However certain information is collected by the College in order for the College to operate in the education of its students.

Personal Information - The following kinds of personal information are likely to be collected by Lumen Christi College and held in a 'Record':

For students this could include name, address, telephone number, date of birth (and age), birth certificate, conduct reports, next of kin details, emergency contact numbers, names of doctors, school reports, assessments, referrals (e.g. government welfare agencies/departments), correspondence with parents, photographs, current/previous school, health fund details and Medicare number, etc.

For parents this could include name, address, email address, telephone number, date of birth, vehicle registration details, occupation, marital status/problems, custody details, doctor's name and contact information, Medicare number, other children's details, donation history, maiden name of ex-students, alumni year, whether alumni had further education, professional experience and personal news, etc.

For job applicants, staff members and contractors this could include name, company name and ABN, telephone number, email address, Tax File Number (TFN), date of birth and age, contact details of next of kin, emergency contact numbers, including doctor, residency status/work visa status, qualifications, education, academic transcript, work permit, Passport, details of previous salary, salary being sought and other salary details, details of referees, bank account number, superannuation details, marital status, letters of appointment/complaint/warning/resignation, record of interview, leave applications, discipline issues, professional development appraisals, performance review, photograph, applications for promotions, references, commencement date, employment agency details, former employers, teacher registration number, blue cards, registration cards, etc.

Personal information might also be collected from other people such as board members, committee members, volunteers, neighbours, donors and others.

Sensitive Information - The following kinds of sensitive information are likely to be collected by Lumen Christi College and held in a 'Record':

For students this could include religion, birth certificate, language spoken at home, religious records, whether Aboriginal, nationality, country of birth, Sacrament/Parish (current Parish, name of referring Priest, date and place of Baptism, Confirmation, Eucharist and Reconciliation), and Baptism Certificate, etc.

For Parents this could include religion, country of birth, nationality. Also parental education, parental occupation and other like personal/family socio – economic information required for purposes such as, but not limited to, school funding ICSEA calculations, etc.

For job applicants, staff members and contractors this could include place of birth, religion, religious education, criminal record check, relevant child protection law information, member of professional associations, trade union membership, country of birth and nationality, etc.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the individual agrees otherwise, or the use or disclosure of the sensitive information is allowed by law.

Health Information - The following kinds of health information are likely to be collected by Lumen Christi College and held in a 'Record':

For students this could include medical background, immunisation records, medical records, medical treatments, accident reports, absentee notes, medical certificates, height and weight, nutrition and dietary requirements, assessment results for vision, hearing and speech, reports of physical disabilities, illnesses, operations, paediatric medical, psychological, psychiatric and psychometric information, developmental history, diagnosis of disorders, learning details (recipient of special procedures, assessment for speech, occupational, hearing, sight, ADD, Educational Cognitive (IQ)), etc.

For parents this could include history of genetic and familial disorders (including learning disabilities), miscellaneous sensitive information contained in a doctor or hospital report, etc.

For job applicants, staff members and contractors this could include medical condition affecting ability to perform work, health information, compensation claims and doctor's certificates, etc.

What kinds of personal information is collected and how it is collected

The type of information the College collects and hold includes (but is not limited to) personal information, including health and other sensitive information, about:

- Students and parents and/or guardians (Parents) before, during and after the course of a student's enrolment at the College.
- Job applicants, staff members, volunteers and contractors.
- Other people who come into contact with the College.

Personal Information you provide: The College will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than parents and students provide personal information.

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.

Exception in relation to employee records: Under the Privacy Act and Western Australian legislation, 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.

How will the College use the personal information you provide?

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, or to which you have consented.

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 for the student. This includes satisfying the needs of parents, the needs of the student and the needs of the Catholic Education Commission of Western Australia (CECWA) and Lumen Christi College throughout the whole period the student is enrolled at the College.

The purposes for which CECWA and the College uses personal information of students and parents include:

- To keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines, etc.
- Day-to-day administration.
- Looking after students' educational, social, spiritual and medical wellbeing.
- Seeking donations and marketing for the College.
- To satisfy the CECWA's and Lumen Christi College's legal obligations and allow the College to discharge its duty of care.

In some cases where the College requests personal information about a student or parent, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

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

- In administering the individual's employment or contract, as the case may be.
- For insurance purposes.
- Seeking funds and marketing for the College.
- To satisfy the CECWA's and Lumen Christi College's legal obligations, for example, in relation to child protection legislation.

Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable the College and the volunteers to work together.

Marketing and Fundraising: Lumen Christi 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 be a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in the College's fundraising, for example, the College's Building Fund or alumni (*Appendix 3*) organisation, or, on occasions, external fundraising organisations.

Parents, staff, contractors, past students and staff, and other members of the wider College community may from time to time receive fundraising information. College publications, e.g. newsletters, the College website, etc. which include personal information, may be used for marketing purposes.

Exception in relation to related schools: The Privacy Act allows each school, being legally related to each of the other schools conducted by the Catholic Education Commission of Western Australia (CECWA) to share personal (but not sensitive) information with other schools conducted by CECWA. Other CECWA schools may then only use this personal information for the purpose for which it was originally collected by that school or CECWA. This allows schools to transfer information between them, for example, when a student transfers from a CECWA school to another school conducted by CECWA.

Who might the College disclose personal information to and store your information with? Lumen Christi College may send personal information, including sensitive information, held about an individual to:

- Another school.
- Government departments.
- Your local parish.
- Medical practitioners.
- People providing services to the College, including specialist visiting teachers, counsellors and sports coaches.
- Recipients of College publications, such as newsletters and magazines.
- Parents.
- Anyone you authorise the College to disclose information to.
- Anyone to whom we are required to disclose the information by law.

Sending and storing information overseas: Lumen Christi College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, the College 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).
- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The College may also store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia if applicable.

How does the College treat sensitive information? In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information: CECWA's and the College's staff members 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 that it 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.

The College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update the personal information held by the College by contacting the Principal (or delegate) at any time. The Australian Privacy Principles require that personal information is not stored longer than necessary.

Access and correction of personal information: Under the Commonwealth Privacy Act, an individual has the right to obtain access to personal information which CECWA or the College holds about them and to advise CECWA or the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally have access to 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 request access to specific information the College holds an application should be made to the Principal in writing. Verification of identity will be required and 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 the College cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

Consent and rights of access to the personal information of students: Lumen Christi 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. Consent given by parents will be treated 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. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the College's duty of care to the student.

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

Consent and Young People: The Privacy Act does not distinguish between adults and children and thus clearly envisages that young people are to be afforded rights in respect of their privacy. However, the Australian Privacy Principles (APPs) do not differentiate between children of different ages and thus it is difficult to determine when it is appropriate to seek consent from students. The APP Guidelines provide as follows:

- The Privacy Act does not specify an age after which individuals can make their own privacy decisions. An APP entity will need to determine on a case-by-case basis whether an individual under the age of 18 has the capacity to consent.
- As a general principle, an individual under the age of 18 has capacity to consent when they have sufficient understanding and maturity to understand what is being proposed. In some circumstances, it may be appropriate for a parent to consent on behalf of a young person, for example, if the child is young or lacks the maturity or understanding to do so themselves.

If it is not practicable or reasonable for an APP entity to assess the capacity of individuals under the age of 18 on a case-by-case basis, the entity may presume that an individual aged 15 or over has capacity to consent, unless there is something to suggest otherwise. An individual aged under 15 is presumed not to have capacity to consent.

Enquiries and Complaints: The College will take reasonable steps in the circumstances to implement practices, procedures and systems relating to the College's functions or activities that will enable the College to deal with enquiries or complaints about its compliance with the APPs.

If you would like further information about the way CECWA or Lumen Christi College manages the personal information it holds, or wish to complain that you believe that CECWA or Lumen Christi College has breached the Australian Privacy Principles, please contact the Principal at Lumen Christi College. CECWA or Lumen Christi College will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made. If a complaint is not resolved by CECWA or the College the Privacy Commissioner may investigate the complaint.

References:

Bishops of Western Australia 2009, *Mandate Catholic Education Commission of Western Australia: 2009-2015*

National Catholic Education Commission Privacy Compliance Manual (April 2014)

Privacy Act 1988

School Education Act 1999

Children and Community Services Act 2004

2-D1 Dispute & Complaint Resolution

Appendices

Appendix 1

Summary of the College’s Obligations Imposed by the Australian Privacy Principles (APPs)

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Lumen Christi College Collection Notice

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Lumen Christi College Alumni Association Collection Notice

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Lumen Christi College Employment Collection Notice

Review History:

<i>Year of Review</i>	<i>Reviewed by</i>	<i>Amendments/Review</i>
2007	Executive Leadership Team	Originally Released
2010	Executive Leadership Team	Amended
2014	Executive Leadership Team	Amended

Next Review:

<i>Year</i>	<i>Responsibility</i>
2018	Executive Leadership Team

Appendices

Appendix 1

Summary of a the College's Obligations Imposed by the Australian Privacy Principles (APPs)

1. Manage personal information in an open and transparent way.
2. Take such steps as are reasonable in the circumstances to implement practices, procedures and systems relating to the College's functions or activities that:
 - Will ensure compliance with the APPs.
 - Will enable the School to deal with inquiries or complaints about compliance with the APPs.
3. Have a clearly expressed and up-to-date Privacy Policy about the College's management of personal information.
4. If it is lawful or practicable, give individuals the option of interacting anonymously with the School or using a pseudonym.
5. Only collect personal information that is reasonably necessary for the College's functions or activities.
6. Obtain consent to collect sensitive information unless specified exemptions apply.
7. Use fair and lawful means to collect personal information.
8. Collect personal information directly from an individual if it is reasonable and practicable to do so.
9. If the School receives unsolicited personal information, determine whether it could have collected the information under APP 3 as if it had solicited the information. If so, APPs 5-13 will apply. If not, the information must be destroyed or de-identified.
10. At the time the School collects personal information or as soon as practicable afterwards, take such steps (if any) as are reasonable in the circumstances to make an individual aware of:
 - Why the School is collecting information about them.
 - Who else the School might give it to.
 - Other specified matters.
11. Take such steps (if any) as are reasonable in the circumstances to ensure the individual is aware of this information even if the School has collected it from someone else.
12. Only use or disclose personal information for the primary purpose of collection unless one of the exceptions in APP 6.2 applies (for example, for a related secondary purpose within the individual's reasonable expectations, you have consent or there are specified law enforcement or public health and public safety circumstances).
13. If the information is sensitive, the uses or disclosures allowed are more limited. A secondary purpose within reasonable expectations must be directly related to the primary purpose of collection.
14. Do not use personal information for direct marketing, unless one of the exceptions in APP 7 applies (for example, the School has obtained consent or where the individual has a reasonable expectation of their information being used or disclosed for that purpose and the School has provided a simple means for the individual to unsubscribe from such communications).
15. Before the School discloses personal information to an overseas recipient it must take such steps as are reasonable in the circumstances to ensure that the recipient does not breach the APPs, unless an exception applies.
16. Government related identifiers must not be adopted, used or disclosed unless one of the exceptions applies (e.g. the use or disclosure is reasonably necessary to verify the identity of the individual for the purposes of the College's functions or activities).
17. Take such steps (if any) as are reasonable in the circumstances to ensure the personal information the School collects, uses or discloses is accurate, complete and up-to-date. This may require the School to correct the information and possibly advise organisations to whom it has disclosed the information of the correction.

18. Take such steps as are reasonable in the circumstances to protect the personal information the School holds from misuse, interference and loss and from unauthorised access, modification or disclosure.
19. Take such steps as are reasonable in the circumstances to destroy or permanently de-identify personal information no longer needed for any purpose for which the School may use or disclose the information.
20. If requested, the School must give access to the personal information it holds about an individual unless particular circumstances apply that allow it to limit the extent to which it gives access.

*Note: This is a summary only and NOT a full statement of obligations. Please refer to the *National Catholic Education Commission and National Council of Independent Schools' Associations Privacy Compliance Manual*.*

Appendix 2

Lumen Christi College Collection Notice

1. Lumen Christi College collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable Lumen Christi College to provide schooling to the student and to enable him/her to take part in all the activities of the College. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
2. Certain laws governing or relating to the operation of schools require that certain information is collected. These include Public Health, School Education Act 1999 and Child Protection laws, including The Children and Community Services Act 2004.
3. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may ask you to provide medical reports about students from time to time.
4. If the College does not obtain the information referred to above we may not be able to enrol or continue the enrolment of your son/daughter.
5. Lumen Christi College from time to time discloses personal and sensitive information to others for administrative and educational purposes. This includes to other schools, government departments, government agencies, statutory boards, the Catholic Education Office, the Catholic Education Commission, your local diocese and the parish and/or schools within other Catholic Dioceses. Information is also disclosed to government authorities such as the College's Curriculum and Standards Authority (SCSA), the Australian Curriculum, Assessment and Reporting Authority (ACARA), medical practitioners, and people providing services to the College, including specialist visiting teachers, [sports] coaches, volunteers and counsellors.
6. In addition to the agencies and purposes cited above personal information relating to students and parents may also be made available, in accordance with Australian Government requirements, to ACARA for the purpose of publishing certain aggregated school information relating to the circumstances of parents and students on the MySchool website.
7. Lumen Christi College may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. Personal information collected from students is regularly disclosed to their parents or guardians.
9. Parents may seek access to personal information collected about them and their son/daughter by contacting the College. Students may also seek access to personal information about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the student, or where students have provided information in confidence.
10. Lumen Christi College Privacy Policy also sets out how you may complain about a breach of privacy and how the College will deal with such a complaint.
11. As you may know, Lumen Christi College from time to time engages 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 College'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.
12. On occasions information such as academic and sporting achievements, student activities and similar news is published, in both hard and digital copy, in the College newsletters and magazines and on our website.
13. We may include your contact details in a class list and College directory.
14. If you provide Lumen Christi College with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.

15. On occasions information such as academic and sporting achievements, student activities and similar news is published in the College newsletters and magazines and on our website. Photographs of student activities such as sporting events, College camps and College excursions, etc. may be taken for publication in College newsletters and magazines and on our intranet. Lumen Christi College will obtain separate permissions from the students' parent or guardian prior to publication if we would like to include photographs or other identifying material in promotional material for the College or otherwise make it available to the public such as on the internet. We may include students' and students' parents' contact details in a class list and College directory.

Appendix 3

Lumen Christi College Alumni Association Collection Notice

1. The Alumni Association/Lumen Christi College may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of Lumen Christi College and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the Alumni Association/Lumen Christi College.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the Alumni Association/Lumen Christi College to assist in its fundraising activities. If you do not agree to this, please advise us in writing now.
4. The Alumni Association/Lumen Christi College may publish details about you in our publications and on the College's website. If you do not agree to this you must advise us in writing now.
5. The College's Privacy Policy contains details of how you may seek access to personal information collected about you or how you may complain about a breach of the Australian Privacy Principles (APPs).
6. The College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia, if applicable
7. If you provide personal information to us about other people, we encourage you to inform them of the above matters.

Appendix 4

Lumen Christi College Employment Collection Notice

1. In applying for this position you will be providing Lumen Christi College with personal information. We can be contacted at 81 Station Street, Gosnells, WA, 6110; by telephone on (08) 9394 9300; by email at lumen@lumen.wa.edu.au or by post to PO Box 22, Martin, WA, 6990.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The College's Privacy Policy contains details of how you may complain about a breach of the Australian Privacy Principles (APPs) or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
4. We will not disclose this information to a third party without your consent.
5. We are required to conduct a criminal record check and/or to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. * We may also collect personal information about you in accordance with these laws.*
6. The College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.*

* If applicable

Appendix 5

Lumen Christi College Contractor/Volunteer Collection Notice

1. In applying to provide services to Lumen Christi College, you will be providing the College with personal information. We can be contacted at 81 Station Street, Gosnells, WA, 6110; by telephone on (08) 9394 9300; by email at lumen@lumen.wa.edu.au or by post to PO Box 22, Martin, WA, 6990.
2. If you provide us with personal information, for example your name and address or information contained on your resume, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for **[insert amount of time]**.
4. The College's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the Australian Privacy Principles (APPs).
5. We will not disclose this information to a third party without your consent
6. We are required to conduct a criminal record check and/or to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. * We may also collect personal information about you in accordance with these laws.*
7. Lumen Christi College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.*
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to Lumen Christi College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.

* If applicable