

 St Martin's COLLEGE	PRIVACY AND INFORMATION SECURITY POLICY
	<p>Policy 3.3</p> <p>Date Approved by Board: June 2023</p>

ST MARTIN'S COLLEGE INC.

St Martin's College acknowledges that your privacy is important. We collect personal information that is provided to us by people about themselves. This information may come from applicants, college residents, staff, volunteers, contractors and Board members. St Martin's College is committed to protecting your privacy and to handling personal information in accordance with the Australian Privacy Principles (APP) outlined in the legislation including the amendments that have been made to the [Privacy Act 1988](#) .

As an Affiliated College of Charles Sturt University some personal information of people associated with St Martin's College will also be subject to the Privacy Policies of Charles Sturt University (especially with regards to use of phones and internet) and you should make yourself aware of that organisation's Privacy Management Plan.

CSU IT: <http://www.csu.edu.au/division/dit/about/privacy.htm>

CSU Privacy Management Plan: [Privacy Management Plan / Document / CSU Policy Library](#)

Collection of Personal Information

In the course of our operation we collect and hold personal information about present students, their parents/guardians, alumni, staff, Board members and other individuals. This information is required to assist St Martin's College in providing for the educational, social, spiritual and medical well being of students and staff as well as to meet our various legal obligations, particularly with regards to Duty of Care.

We will only collect personal information directly from you by lawful and fair means without being unreasonably intrusive. Where reasonable and practicable we will only collect personal information about an individual from that individual.

Personal information about students, such as their CSU ID number may also be obtained from Charles Sturt University (CSU) to enable the provision of services such as allowing you to access your cottage using the cardax system.

Some information provided to us by residents, staff, contractors and other third parties might be considered private or personal. Without these details we would not be able to carry out our operations & ministry.

Once we hold personal information, we will take reasonable steps to ensure that the information is accurate, secure, complete and up-to-date.

Use and Disclosure of Information

The college collects personal information that is reasonably necessary for one or more of the college functions and operations. This information may include, name address, telephone numbers, email addresses and other sensitive information to:

1. Sustain day to day administrative and operational procedures
2. Maintain student and staff health & well being especially in medical emergencies
3. Communicate to maintain college operations with college residents, prospective students with staff, Board members, suppliers and alumni
4. Satisfy any legal obligations in the discharge of the College's Duty of Care
5. Award College Scholarships
6. Maintain security and uphold college rules and implement discipline policies
7. Establish general statistical information

Personal information will not be disclosed or provided to any other body except as follows: This information may be disclosed to other organisations to assist in the adequate functioning of the community, for publishing of names, news and photos as part of college advertising and promotion, or if requested from entities such as Centrelink or Services Australia (may require confirmation of student residency), ATO (provision of taxation liabilities), Real Estate Agents (rental references), assisting the police or the ambulance service.

You should be aware that others receiving this information will only be given the essential information required and that they may have different privacy policies, but unless you inform us to the contrary and with legal justification, we will assume your consent to provide such information to selected parties.

We are permitted to use and disclose information held about you:

1. Where you have consented to the use or disclosure (provision of the information for a specific purpose is considered consent).
2. Where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or public health and safety.
3. Where we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use of the disclosure is a necessary part of our investigation or in reporting the matter to other relevant authorities such as CSU, the police, the ATO or Services Australia.
4. Where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process).
5. Where we reasonably believe that the use or disclosure is reasonably necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings or the preparation for, conduct of, proceedings before any court, tribunal or discipline committee or the implementation of orders of a court, tribunal or discipline committee by or on behalf of an enforcement body.
6. Where information is required by ambulance staff to enable emergency care and/or hospital admission.

Security, Storage & Disposal

The College holds personal information in electronic and paper-based records and we have security measures in place to attempt to protect against the loss, misuse or alteration of personal information under our control.

Access to electronic records is limited to the Head of College and the administrative officers, or in some circumstances staff of CSU's Division of Information Technology (see above for a link to the CSU IT Privacy Policy). Student medical information held by St Martin's College is also accessible by senior students (Residential Advisors) of the college to assist in dealing with medical emergencies.

Personal information will generally be permanently & securely destroyed or de-identified when the reason for holding it no longer applies. The exception to this is any personal information that may be required to maintain contact with our Alumni (you can request the deletion of this contact information at any time), any financial records which we are required to retain for legal records and accounting purposes, or any information relating to discipline matters that may be required for future appeals or possible legal action.

Website

The entire contents of the St Martin's College website www.stmartinscollege.org is Copyright © St Martin's College Inc . except where otherwise indicated on the site and is protected by Australian and International copyright laws.

You should be aware when accessing the College website or Facebook Groups that no Internet data transmission can be guaranteed to be secure. Any information posted, even in closed groups, could be accessed externally. While St Martin's College strives to protect and respect the privacy of individuals and confidential information, we cannot guarantee the security of such publicly presented information.

The information on the College website site is for personal use only. St Martin's College collects no user identifiable information from visitors to the college website, however non-personal information may be used in an aggregated form for site development purposes. Links to other websites provided on the St Martin's college website are to enable users to link to useful information from other organisations and St Martin's College is not responsible for the content or practices of such third party websites and once visitors have left the college website please note that the St Martin's College Privacy Policy no longer applies. It is up to users to check the applicable policies of other websites.

Access to and correction of Personal Information

If you ask, we will tell you what personal information we hold about you, and what we do with it. We will facilitate access to you by allowing an inspection of your personal information in person, or by providing copies or a summary of relevant documents, depending on what is most appropriate in the circumstances following receipt of your request. Any fee we charge in providing this access will be reasonable.

If you can show that the personal information we hold is inaccurate, we will take reasonable steps to correct it. Please note that we are not required to provide access to personal information in some situations, for example where the request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonably interfere with another person's privacy, or be a breach of the law. If we refuse access, we will advise you of our reasons for doing so.

Staff Members may not have access to the following material held on personal file:

- (a) referee reports, obtained in confidence by the College, unless the referee gives permission; and

- (b) correspondence between the College and its solicitors relating to litigation pending, in progress or completed between the College and resident.

Identifiers

We will not adopt as our own any identifiers that you may provide to us, such as TFN's or Medicare numbers, unless the assignment of the identifiers is necessary to enable us to carry out any of our functions efficiently

Anonymity

Wherever it is lawful and practicable, individuals have the option of not identifying themselves when contacting us. The nature of the ministry carried on by us means that, generally, it is not possible for us to provide services to students, alumni, Board members or staff members in an anonymous way.

Transferring of Information

It is unlikely that we will transfer any personal information about you to an overseas recipient. Such a transfer of information we have collected about you to someone other than you, either interstate or in a foreign country, will only occur if we believe the transfer is permitted by the National Privacy Principles. This will generally only occur if a student has a parent who lives overseas and if permission for the transfer of information has been approved by the student.

Complaints

We are committed to providing to all parties whose personal information we hold, a fair and responsible system for the handling of their complaints.

If you have a complaint about our Privacy Policy or the collection, use or safe disposal or destruction of your personal information, then in the first instance you should advise us of your complaint at email: stmartins@csu.edu.au

We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of personal information held by us about you in accordance with the Commonwealth Privacy Legislation. If you are not satisfied with the outcome of this procedure, then you may request that an independent person (usually the Commonwealth Privacy Officer) investigate your complaint.

Change of Policy

We may change this Policy from time to time without notice.

Contact Us

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Updated June 2023

If you require any further information about this policy and personal information we hold about you, you may contact the college as follows:

The Head of College
St Martin's College
PO Box U1
Charles Sturt University
Wagga Wagga
NSW 2678

or email:

stmartins@csu.edu.au

The college will respond to any requests in writing within a reasonable time