



## **PRIVACY POLICY**

**Implementation Date: November 2022**

### **PART A: PHOTOGRAPHY, FILMING AND RECORDING STUDENTS POLICY**

### **PART B: PRIVACY COLLECTION NOTICE**

#### **PREAMBLE**

The Associated Catholic Colleges (ACC) is responsible for the organisation and administration of interschool sport and activities for its member schools. In the performance of this function, the ACC will be required to collect personal information for the purposes of carrying out these functions. Photographs and recordings of students is classified as personal information for the purposes of the Privacy and Data Protection Act 2014 (Vic).

This policy is to be read in conjunction with your school's photography and filming policy and Privacy Policy.

### **PART A: PHOTOGRAPHY, FILMING AND RECORDING STUDENTS POLICY**

This policy applies to the general collection, use and disclosure of photographs, films and recordings ("images") of students. It does not cover the use of Closed Circuit Television (CCTV).

This policy outlines the practices that the ACC has in place for the collection, use and disclosure of images of students to ensure compliance with the Privacy and Data Protection Act 2014 (Vic). It also explains the circumstances in which the ACC will seek parent/carers consent and how consent can be provided and/or withdrawn.

During ACC sporting events and interschool activities, ACC staff may photograph, film or record students participating in ACC activities or events. We do this for many reasons including to celebrate student participation and achievement, communicate with our school communities and to promote ACC events on the ACC website and other social media accounts.

ACC staff and photographers utilised by the ACC will be clearly identifiable in an ACC uniform or marked vest. When an ACC event will have photography or filming, details will be communicated to participating schools prior to the event. Information about photography and media attendance

may be included in event invitations and event planning information.

Images of students will be collected using a variety of equipment that may include, but not limited to, video cameras, digital cameras, smartphones and remotely piloted aircraft (drones). The use of drones will comply with the Civil Aviation Safety Authority (CASA) regulations.

Images of students may be used in publications that are accessible to the public via:

- ACC website
- ACC social media channels including, but not limited to, Instagram, Facebook, Twitter and YouTube.

The ACC will use student images reasonably, appropriately and sensitively, in accordance with any privacy and safety considerations. If at any time a parent/carer or student has a concern about the use of any images they should put that request in writing attention to the ACC Executive Officer at [paddy@accvic.au](mailto:paddy@accvic.au).

Member schools are required to inform the ACC staff and ACC event managers when:

- students are participating in ACC events and;
- the student's parent/carer has withdrawn consent for the school to use that student's image in photography, videography or other recordings undertaken by the school.

### ***Withdrawing Consent***

In addition to the processes outlined above, parents/carers can contact the ACC Executive Officer via [paddy@accvic.au](mailto:paddy@accvic.au) at any time to withdraw their consent for any future collection, use or disclosure of images of their child. Once the written request is lodged, the ACC will take action on the request. This may include making contact with the family that made the request for the purposes of clarification only, notifying the student's school, informing the event media team, and giving the child a wristband so the media team understand that the child has requested to be exempt from any photography, filming or other recordings at this event.

However:

- If the images have already been published and are in the public domain, it may not be possible for consent to be withdrawn.
- There may be occasions when the ACC will photograph, film or otherwise record students at large group events and make those recordings available to the ACC community through shared secure online platforms, and if your child participates, they may appear in these recordings which will be available to the whole school community.

## ***Media***

The media may seek to photograph, film or record students for a news story. This may include broadcast media, online or social media or print media, including newspapers and magazine publications.

When the ACC receives such requests, it will:

- Provide schools and parents with information about the organisation involved and when/for what purposes the photography, filming or recording will occur;
- Seek prior, express parent/carers consent in writing;
- Students will only be photographed, filmed or recorded by the media at an ACC event if express consent is provided for that specific media event. Neither the school nor the ACC own or control any photographs, films or recordings of students taken by the media.

## ***Other External Collection, Use or Disclosure***

If there is a situation which will involve the collection, use or disclosure of images or recordings of students by or to third parties which is not otherwise covered by this policy, the ACC will provide schools with information about the event or activity, the organisation involved and when the photography, filming or recording will occur. The ACC will also seek prior, express parent/carers consent in writing as appropriate.

If you have any questions or concerns regarding photography, videography or other recording at an ACC event, please speak with staff at your school and/or ACC staff.

## **PART B: PRIVACY COLLECTION NOTICE**

Personal Information that may be collected for the purposes of conducting ACC events include

- Student's name;
- School;
- Year Level;
- Date of birth. Date of birth is collected to ensure that the student competes in an age appropriate event/team using age appropriate modifications as required by the sport.
- Email address.

The ACC values the privacy of every person. When collecting and managing personal information, all ACC staff must comply with Victorian Privacy Laws.

The ACC will only use or disclose personal information about students, with parents or staff, when it is necessary for the ACC to carry out its functions outlined above or to fulfil a legal obligation.

## **IMPLEMENTATION**

1. This policy reflects current practice.
2. The policy can be found on the ACC website
3. Updates to this policy will be circulated to all schools via the ACC Website and email distribution to ACC committees.

## **ENDORSEMENT**

This policy was endorsed by the ACC Principals' Committee in November 2022.

## **REVIEW**

This policy is to be reviewed every two (2) years.  
Next review date: November 2024