



Padua College Privacy Collection Notice – Media management and facial recognition technology platforms



1. Introduction

Melbourne Archdiocese Catholic Schools Ltd (**MACS**) schools operate with the consent of the Catholic Archbishop of Melbourne and are owned, operated and governed by MACS.

2. Scope

This Collection Notice applies to the collection of personal information (including Sensitive Information) when media management and facial recognition technology (FRT) platforms are used. It applies across MACS and MACS schools including specialist schools operated by MACS subsidiary, Melbourne Archdiocese Catholic Specialist Schools (MACSS) and school boarding premises operated by MACS schools (collectively referred to as MACS in this Collection Notice) and to the processing and storage of these platforms.

3. Purpose for the collection

3.1. The primary purpose of collecting Personal Information (including Sensitive Information) is to enable the use of media management and FRT platforms so MACS can use either photos or recordings of a Student to:

- identify or verify Students against MACS photos or recordings and apply the relevant Parent consent permissions to those photos or recordings including to restrict, pixelate or obscure content; and/or
- manage and store photos or recordings uploaded from MACS in a secure media gallery for sharing with parents.

3.2. This assists in preventing the mishandling of Personal Information through accidental sharing, outdated permissions, or human error, thereby promoting the safety and privacy of Students. The implementation of such platforms will support participation in school activities within a protected school environment.

4. What we collect and why

4.1. MACS and the school may collect the following Personal Information (including Sensitive Information) from both Students and Parents:

- Full names.
- Student year level.
- Email address.
- Photos or recordings of a Student.
- Biometric information, e.g. an extract of an individual's distinct facial features derived from a photo.

4.2. MACS collects Personal Information (including Sensitive Information) through media management and FRT platforms to:

- Compare, identify or verify individuals in photos or recordings.
- Generate a biometric template of that individual using an individual's biometric information.
- Filter Parent consent permissions to Student photos or recordings based on a biometric template of that individual in order to apply Parent consent permissions in accordance with the Photography and Recording Permission Form.

- Restrict, pixelate or obscure content to de-identify a Student in photos or recordings who do not consent to being included in publications.
- Facilitate internal school functions such as the publication of yearbooks, class projects, and educational materials using photos or recordings of a Student.
- Improve administrative efficiency by replacing manual application of consent permissions to photos or recordings.

5. Use and Disclosure

- 5.1. MACS and the school will only use your Personal Information (including Sensitive Information) as described in this notice and in accordance with the [MACS Privacy Policy](#).
- 5.2. Here are some of the ways MACS and the school use or disclose your Personal Information (including Sensitive Information) using third party media management and FRT platforms:
- Transfer and store Personal Information (including Sensitive Information) including names, photos and recordings to third party media management and FRT platforms.
 - Compare, identify or verify individuals in photos or recordings against a biometric template of that individual.
 - Apply relevant Parent consent permissions prior to publication of content.
 - Manage Parent consent permissions and photos or recordings of Students in a secure media library.

6. Your information and third-party service provider

MACS may use online or cloud service providers to store Personal Information (including Sensitive Information) and to provide services that involve the use of Personal Information. Some Personal Information may be provided to these service providers to enable them to authenticate users that access their services and for technical support such as your name, username or email. This Personal Information may be situated outside Australia, but it is still managed and controlled by MACS. For more information, refer to the [MACS Privacy Policy](#).

7. Access and correction of Personal Information

- 7.1. Parents and Students have a right to request access to and/or correct any Personal Information that MACS / the school holds about them.
- 7.2. Students will generally be able to access and update their Personal Information through their Parents, but older students may, if appropriate, seek access and correction themselves. There are some exceptions to these rights set out in the applicable legislation.
- 7.3. To make a request to access, update or correct any Personal Information that MACS holds about you or your child, please contact the principal by email, post or telephone. Refer to the school's website for contact details. MACS may require you to verify your identity and specify which information you require. MACS may charge a reasonable fee for giving access to your Personal Information. There is no charge for making a request or correcting your Personal Information. MACS will advise of the likely cost in advance if the information sought is extensive.
- 7.4. If we refuse your request, MACS will provide a written notice explaining the reasons for the refusal (unless, given the grounds for refusal, it would be unreasonable to provide reasons) and how to lodge a complaint.
- 7.5. Parents may be able to log into the school's portal and correct and update some of their or their child's Personal Information at any time.

Consent and rights of access to the Personal Information of individuals

- 7.6. MACS respects every Parent's right to make decisions concerning their child's education. Generally, MACS will refer any requests for consent and notices in relation to Personal Information of a student to the student's Parents. Generally, MACS will treat consent given by Parents as consent given on behalf of the student and notice to Parents will function as the notice given to students.

7.7. A Parent may, on behalf of a Student, withhold or withdraw consent for MACS to use media management and FRT platforms in accordance with this Collection Notice by providing written notice to the MACS principal at any time. Where permitted by law, a Student may also withhold or withdraw consent themselves. MACS will take reasonable steps to record the decision to withhold or withdraw consent and cease use of the media management and FRT platforms in relation to that Student.

7.8. Individuals may seek access to Personal Information held by MACS about them or their child by contacting the principal or the MACS Privacy Officer. There may be occasions, however, when MACS refuses access. For example, where the release of the information would have an unreasonable effect on the privacy of others, or where the release of the information may result in a breach of the school's duty of care to the student.

8. More information

8.1. MACS periodically refines this Collection Notice to reflect appropriate information flows.

8.2. If you have a query about your Personal Information and its handling, please check online for the current Privacy Collection Notice.

9. Definitions

Definitions for standard terms used in this document can be found in the MACS [Glossary of Terms](#).

Collection Notice

References to Collection Notice means this Privacy Collection Notice – Media management and facial recognition technology.

Facial recognition technology (FRT)

FRT means a technology platform that scans a digital image of an individual's face to extract and analyse that individual's distinct facial features and create a biometric template, which may be used to compare, identify or verify that individual.

Personal Information

Personal information means information or an opinion about a person that has been identified, or that can be identified. It does not matter whether the information or opinion is true or not. It does not matter whether the information or opinion is recorded or documented, or not¹.

Sensitive Information

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

Policy information table

Related policy	Privacy Policy
Document owner	General Manager, Legal (Corporate, Commercial and Education)
Approving authority	Director, Governance and Legal
Approval date	7 July 2026
Risk Rating	High
Review by	March 2030
Publication	CEVN, school website
Superseded documents	New

¹ *Privacy Act 1988* (Cth) S.6