



PRIVACY POLICY

Salesian College Sunbury is an inclusive Catholic Faith Community in the spirit of St John Bosco.

- We are a welcoming COMMUNITY that fosters an atmosphere of joy and optimism.
- We strive for engagement in LEARNING for which we are collectively responsible.
- We promote the pursuit of EXCELLENCE in all aspects of life.
- We are inspired by our FAITH to serve others and develop as resilient, thoughtful and caring citizens of the world.

Central to these values is an unequivocal commitment to fostering the dignity, self-esteem and integrity of children and young people and providing them with a safe, supportive and enriching environment to develop spiritually, physically, intellectually, emotionally and socially.

BACKGROUND

Salesian College Sunbury (the College) is bound by the Australian Privacy Principles (APP) contained in the Privacy Act 1988 (Cth) (Privacy Act) and if required by contractual obligations, the Privacy and Data Protection Act 2014 (Vic) and the Information Privacy Principles contained within that Act. Salesian College is also bound by the Health Records Act 2001 (Vic) (Health Records Act).

PURPOSE

This policy sets out how the College manages the personal information and the rights of Parents and Students in relation to personal information held about them and how confidential information is stored and managed.

SCOPE

This policy applies to all personal and sensitive information (including health information) handled by the College.

GUIDING PRINCIPLES

The following principles apply to the handling of personal information by the College:

- personal information is managed in an open and transparent way
- only personal and / or sensitive information that is reasonably necessary for the College's functions or activities is collected
- fair and lawful means is used to collect personal information
- consent to collect sensitive information is obtained unless specified exemptions apply
- reasonable steps are taken to protect the personal information the College holds from misuse, interference and loss and from unauthorised access, modification or disclosure
- personal information is only used or disclosed for the primary purpose of collection unless an exception applies

WHY SALESIAN COLLEGE SUNBURY COLLECTS PERSONAL INFORMATION

The College will only collect personal, sensitive (including health) information, if the information is reasonably necessary for one or more of its functions or activities and stores data either electronically or in paper copies with a high degree of security and confidentiality.

The types of personal information collected depends on the type of relationship held and the level of engagement with the College. The College collects personal information by lawful and fair means in relation to:

- students
- parents, guardians, carers (Parents)
- job applicants and employees
- volunteers
- donors and members
- contracted service providers and suppliers
- visits to the College website and intranet (Schoolbox)
- members of the public who interact with the College

The College collects personal information in writing, through technology systems or in conversations, visits to the College, directly from the individual or from another source where reasonably required such as Parents, contracted service providers or referrers. In some circumstances, the College collects personal information from other sources, for example:

- from another entity related to the College
- a third party, such as a contracted service provider providing services to the College
- information provided to a third party by an individual for the purpose of sharing it with the College
- information sharing entities authorised by law
- CCTV systems which are used on College premises to provide safe environments for staff, students and visitors.

Where individuals do not provide information requested to the College, it may affect their ability to access College services and systems. For example, 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. The College will inform individuals when such issues arise.

The College may receive information about individuals even where it has taken no active steps to collect information. If permitted or required by law, the College may keep records of this information. If not, the College will destroy or de-identify the information where practicable, lawful and reasonable to do so.

WHAT INFORMATION IS COLLECTED BY THE COLLEGE?

Types of personal information

The information the College collects depends on how individuals interact with the College, the purpose of that interaction and the nature of the relationship with the College. The College also uses specific Collection Notices in connection with the type of engagement.

Students and Parents before, during and after the course of a student's enrolment at the College:

- name, contact details (including next of kin), date of birth, gender, language
- background, previous school, religion
- parents' education, occupation, language spoken at home, nationality and country of birth
- health information (e.g., details of medical condition, disability and / or allergies, dietary requirements, absence notes, immunisation details, medical reports, names of doctors)
- Victorian Student Number (VSN)
- results of assessment tasks and other classroom activities
- conduct and complaint records or other behaviour notes, and school reports
- information about referrals to government welfare agencies

- counselling reports
- health fund details and Medicare number
- any Family Court orders
- criminal records
- volunteering information
- photos, videos at school activities, events and through closed circuit television (CCTV) if in use on College premises

Employees, job applicants, volunteers, contractors

- name, contact details (including next of kin), date of birth, religion
- information on job applications
- qualifications, registrations and professional learning history
- salary and payment information, including banking and superannuation details health information (e.g., details of disability and / or allergies, medical certificates
- national police check and working with children check
- complaint records and investigation reports
- leave details
- photos and videos at school events
- workplace surveillance information, including CCTV footage
- work email and private email (when using work email address) and internet browsing history.

Suppliers, donors, members and visitors including, but not limited to:

- name, contact details
- work email and private email (when using work email address) and internet browsing history.

HOW DOES SALESIAN COLLEGE SUNBURY TREAT SENSITIVE INFORMATION?

Sensitive information

The College will only collect sensitive information (including health information) if it is reasonably necessary for its functions or activities, a permitted general or health situation exists, or where the College has consent from the individual or their Parent (in the case of students).

Sensitive information will only be used and disclosed for the purpose for which it was collected, a directly related secondary purpose in limited circumstances, with your consent, or as required or authorised by law.

HOW DOES THE COLLEGE USE AND DISCLOSE INFORMATION

Use or disclosure

The College only uses or discloses Personal, including Sensitive information, under the following circumstances:

- for the purpose for which it was collected
- for a purpose which you might reasonably expect is related to the primary purpose (except for sensitive or health information)
- where the individual has consented to the use or disclosure
- if the College is permitted or required by law to do so.

The College may use Personal information in the following ways:

Students and Parents

- admission and enrolment
- providing schooling and school activities
- satisfying the needs of Parents, the needs of Students and the needs of the College during the whole period a Student's enrolment at the College
- making the required reports to government authorities
- keeping Parents informed about matters related to their child's schooling, through correspondence, apps, newsletters and magazines
- day to day administration, operations, and quality assurance
- seeking and processing the payment of school fees within the same diocese including when a student transfers between such schools
- looking after Students' educational, social, spiritual and health wellbeing
- satisfying College legal obligations
- allowing schools to discharge duty of care and child safety obligations.

Employees

- administering the individual's employment or contract including:
 - corresponding with employees
 - professional learning and development processes
 - salary and payment information, including superannuation details
 - medical details (e.g. details of disability, and / or allergies, medical certificates)
 - complaint records and investigations
- administrative matters including for insurance purposes
- looking after Staff occupational, social, spiritual and health wellbeing
- to respond in the event of an emergency
- for evaluation and improvement of the work environment
- satisfying the College's legal obligations, for example, in relation to child protection legislation.

Volunteers

- to contact individuals and to administer the volunteer position
- administrative matters including for insurance purposes
- satisfying the College's legal obligations, for example, in relation to child protection legislation.

Job applicants, contractors and others

- assessing and if successful, engaging an applicant or contractor
- information provided by a former employer or a referee
- making an offer of employment or engagement
- administering an individual's contract
- administrative matters including for insurance purposes
- fulfilling a contract obligation
- corresponding with individuals to administer their relationship with Salesian College Sunbury
- satisfying the College's legal obligations, for example, in relation to child protection legislation.

THIRD PARTIES

The College may share Personal information (including Sensitive information) with third parties where it is necessary and appropriate for the purposes set out above including but not limited to:

- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student, and schools within the same diocese where concurrent applications for enrolment are made to those schools
- government departments (including for policy and funding purposes)
- the Victorian Catholic Education Authority (VCEA), the archdiocese and parishes, other church related agencies / entities and schools within other dioceses, or other dioceses
- local parishes associated with the school/college
- medical and health practitioners
- people providing educational support and health services to the school, including specialist visiting teachers, health professionals, sports coaches, volunteers and counsellors
- fundraising organisations, venues and event organisers, marketing and communication agencies
- specialist advisory services including in human resources, child protection and students with additional needs) and providers of learning and assessment
- authorised agencies and organisations to whom Salesian College Sunbury is required to disclose personal information for administrative, educational and research purposes including
 - the Australian Curriculum, Assessment and Reporting Authority (ACARA),
 - NAPLAN Test Administration Authorities
 - Victorian Curriculum and Assessment Authority (VCAA)
 - Nationally Consistent Collection of Data (NCCD) for quality assurance processes
 - participation in the Australian Early Development Census (AEDC) and government audits
- regulatory, investigative and law enforcement or government bodies such as to enable the College to discharge its responsibilities under child safety legislation, including Commission for Children and Young People (CCYP), Victorian Institute of Teaching (VIT) and Victoria Police.
- where a 'permitted general situation' as defined in the Privacy Act exists
- people and organisations providing administrative, technology, professional, and financial services to the College
- other providers of specific information management and storage systems and other information technology services to the College
- recipients of College specific publications, such as school newsletters and magazines
- financial institutions for payment processing
- referees whose details job applicants provide to the College
- Students' Parents
- anyone you authorise the College to disclose information to
- anyone to whom the College is required or authorised by law to disclose the information, including child protection laws.

ASSOCIATED LEGISLATION AND SCHEMES

The College is an information sharing entity (ISE) in accordance with the Child Wellbeing and Safety (Information Sharing) Amendment Regulations 2020 (Vic.). This legislation broadens the circumstances in which the College may share information to support the wellbeing and safety of children and students.

The College maintains appropriate confidentiality when it provides information under legislated information sharing schemes, being Child Information Sharing Scheme (CISS) or Family Violence Information Sharing Scheme (FVISS)) or under the Terrorism (Community Protection) Act 2003 (Vic.)

Under the Notifiable Data Breaches (NDB) scheme, the College must inform the Office of the Australian Information Commissioner and affected individuals of any data breach likely to result in serious harm to individuals whose personal information contained in the breach.

HOW DOES THE COLLEGE STORE PERSONAL INFORMATION?

Storage of Personal information

The College may store Personal information in hard copy or electronically. The College will store Personal information until no longer required, including where the law requires the College to retain Personal information.

Security of Personal information

The College has put reasonable steps in place to ensure the protection of 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 access controls to electronic data. These steps include:

- restricting access to information on College systems and local databases to a 'need to know' basis with access levels allocated to staff based on their roles and responsibilities
- ensuring all Staff are aware that they are not to reveal or share personal passwords
- ensuring storage of hard copy files containing personal and health information in lockable cabinets in lockable rooms. The College restricts access to these files on a need to know basis
- implementing physical security measures around College premises to prevent break-ins
- implementing ICT security systems, policies and procedures designed to protect information storage on computer networks
- implementing human resource policies and procedures including a code of conduct, and policies for email and internet usage, information and records management designed to ensure that staff follow correct protocols when managing personal information
- undertaking due diligence with respect to third party providers, including cloud service providers, who may have access to personal information to ensure as far as practicable that they are compliant with the APP or a similar privacy regime.

SENDING AND STORING INFORMATION OVERSEAS

The College may disclose Personal information about an individual to overseas recipients in certain circumstances where it is necessary to perform its functions and activities. For example, to facilitate a school student tour or similar, or in connection with any third-party cloud service provider. The College may provide some limited Personal information to these service providers to enable them to authenticate users that access their services and provide technical support (e.g., services relating to email, instant messaging and education and assessment applications).

The College may store Personal information in the cloud. This means information may reside on a cloud service provider's server which may be situated outside Australia. Examples include Google, which provides GAFE including Gmail, and stores and processes limited personal information for that purpose.

The College makes reasonable efforts to be satisfied about the security of any Personal information collected, processed and stored outside Australia, in connection with any cloud and third-party services. The College will take reasonable steps to ensure cloud service providers are hosted in Australia or otherwise in countries with substantially similar protections as the APP.

For further information about locations where a school stores personal information using cloud service providers, please contact the Principal of the College.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

Access to and correction of personal information

Under the Privacy Act and the Health Records Act, an individual has the right to seek access to and or correction of any Personal information which Salesian College Sunbury holds about them. There are some exceptions to access and correction rights which are set out in the applicable Act. For general inquiries about access and correction refer to the contact details below:

- To make a request to access, update or correct any Personal information that College holds about you or your child, please contact the Principal by email, post or telephone in the first instance. Refer to the school's website for contact details or refer to the Student Collection Notice.
- Individuals may seek access to Personal information held by the College by contacting the College Privacy Officer. There may be occasions, however, when the Privacy Officer may refuse this access request. For example, where the release of the information would have an unreasonable effect on the privacy of others; where the release of the information may result in a breach of the school's duty of care to the student, or in the case of employees, access to the employee record.
- The College may require verification of your identity and for you to specify which information you require. A reasonable fee for giving access to personal information may be charged, but there is no charge for making a request or to correct Personal information. If the information sought is extensive, the College will advise the likely cost in advance.
- If the College refuses a request, written notice will be provided explaining the reasons for the refusal (unless, given the grounds for refusal, it would be unreasonable to provide reasons) and how to complain.
- Specific Collection Notices also set out how an individual may access or correct their Personal information.

Mature minors

In certain circumstances, the Principal of the College may assess a student as a "Mature Minor" in relation to their capacity to make decisions about consent, access or correction. When requested by a student, the Principal may, at their discretion, grant a student access to information held by the school about them or allow a student to give or withhold consent to the use of their personal information, independently of their Parents. This would normally only occur when the maturity of the student and /or the student's personal circumstances warrant it.

INQUIRIES AND COMPLAINTS

For further information about how the College manages the personal information it holds or if you wish to complain that you believe a breach of privacy has occurred, please contact the principal by email, post or telephone or the College Privacy Officer at:

Email: privacy@scr.vic.edu.au

Phone: 03 9744 0000

Writing: Privacy Officer, 1 Macedon Street, Sunbury, VIC 3429.

The College will investigate any complaint and notify the individual of a decision in relation to the complaint as soon as practicable.

An individual can refer complaints to the Office of the Australian Information Commissioner (OAIC) or if they are not satisfied with College's decision in relation to the privacy complaint, or the OAIC can be contacted directly. Contact details are:

Office of the Australian Information Commissioner

GPO Box 5218 SYDNEY NSW 2001 Telephone: 1300 363 992

An online privacy complaint form is available from www.oaic.gov.au.

ROLES AND REPORTING RESPONSIBILITIES

Role	Responsibility	Reporting Requirement
Principal	Ensure publication of this policy and related documents	Annual Attestation to the Board
Strategic Director - Business, Finance & Operations (Salesian College Sunbury Privacy Officer)	Report breaches of Australian Privacy Respond to privacy complaints	Board

DEFINITIONS

See Glossary of Terms for a full set of definitions

Health information

Health information is a subset of sensitive information. It is information or opinion about the health (including illness, disability or injury) of an individual, an individual's expressed wishes about the future provision of health services to the individual or a health service provided, or to be provided, to an individual. Health information also includes personal information collected during the provision of a health service. Health information is regulated in Victoria under the Health Records Act 2001 (Vic).

Mature minor

A mature minor is an individual enrolled at the College who is assessed by the Principal of that school to be a mature minor in all or some circumstances.

Personal information

Information or an opinion about an identified individual or an individual who is reasonably identifiable. 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 not.

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.

Victorian student number (VSN)

A randomly generated 9-digit number assigned to all Victorian students as a unique identifier. Every student under 25 years of age is given a VSN when they first enrol at a Victorian education or training provider. The VSN allows education and training providers to record and monitor the enrolment of students in Victorian and to track student progress through their school age years and beyond, should they continue into vocational education and training (VET). The register of VSN is managed by the Victorian Curriculum and Assessment Authority (VCAA).

RELATED POLICIES AND DOCUMENTS

Photography and Recording Permission Form
Privacy Collection Notice - Students and Parents
Privacy Collection Notice - Job Applicants
Child Safety and Wellbeing Policy
Child Safety and Wellbeing Recordkeeping Procedures
Closed Circuit Television Policy
Complaints Handling Policy

LEGISLATION AND STANDARDS

Australian Education Act 2013 (Cth)
 Australian Education Regulations 2013 (Cth)
 Charter of Human Rights and Responsibilities Act 2006
 Child Wellbeing and Safety Act 2005 (Vic.)
 Child Wellbeing and Safety (Information Sharing) Amendment Regulations 2020 (Vic.)
 Education and Training Reform Act 2006 (Cth)
 Health Records Act 2001 (Vic)
 Privacy Act 1988 (Cth)
 Privacy Amendment (Notifiable Data Breaches) Act 2017(Cth)
 Privacy and Data Protection Act 2014 (Vic).
 Surveillance Devices Act 2004 (Cth)
 Terrorism (Community Protection) Act 2003 (Vic.)
 Ministerial Order 1359 - Child Safe Standards - Managing the risk of child abuse

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website (www.salesiansunbury.vic.edu.au) regularly for any changes.

POLICY INFORMATION

Responsible director	Strategic Director - Business, Finance and Operations
Policy owner	College Board
Approving authority	College Board
Assigned Board Committee	Risk and Compliance
Committee Approval Date	06/10/2020
Executive Approval date	21/05/2026
Next Executive Review date	21/05/2028
Publication	Schoolbox; Website
POLICY DATABASE INFORMATION	
Assigned framework	MS2-Enrolment; CA1-Governance
Superseded versions	2020 v1.0, 2021 v1.1, 2023 v1.2, 2025 v2.0, 2026 v2.1