



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.

PURPOSE

This Privacy Policy sets out how the Salesian College Sunbury manages personal information provided to or collected by it.

The College is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988 (Privacy Act). In relation to health records, the School is also bound by the Health Records Act 2001 (Vic.) (Health Records Act) and the Health Privacy Principles in that Act.

The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing College environment.

What kinds of personal information does the College collect and hold?

The College collects and holds 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 including:

Students: name, contact details (including next of kin), date of birth, gender, language background, previous school, religion, names, addresses and other contact details, medical and welfare information (e.g. details of disability and/or allergies, and details of any assistance the student receives in relation to those disabilities, medical reports, cognitive assessments, immunisation details, psychological reports, counselling reports, names of doctors), photos and videos at school events, , attendance records, conduct and complaint records, or other behaviour notes, school attendance and school reports and photos and videos at school events, information about referrals to government welfare agencies, information obtained during counselling, any court orders.

Parents/guardians/carers: name, address and contact details, education, occupation and language background, including government identifiers (such as TFN), religious beliefs, nationality, country of birth, professional memberships, family court orders and criminal records,

information about referrals to government welfare agencies, financial information, health fund details, Medicare number, and volunteering information (including Working with Children Check).

Job applicants, staff members, volunteers and contractors, including:

Personal Information including names, addresses and other contact details (including next of kin), dates of birth, religion, financial information, citizenship, professional development history,

- information provided by a former employer or a referee, information on job application, salary and payment information, including superannuation details, leave entitlements, regulatory accreditation, media, directorships, property ownership and driver's license information.
- Sensitive Information including government identifiers (such as TFN), nationality, religion, country of birth, professional memberships, complaint records and investigation reports, family court orders and criminal records, photos and videos at school events, workplace surveillance information, employee records, work emails and private emails (when using work email address) and internet browsing history.
- Medical Information (particularly in relation to prospective staff and student records) including medical records, disabilities, details of disability and/or allergies and medical certificates, immunisation details and psychological reports.
- other people who come into contact with the College, including name and contact details and any other information necessary for the particular contact with the College.

Personal Information you provide: The School 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, and through the school's online portal.

On occasions people other than Parents and students such as job applicants and contractors, provide personal information to the College.

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. The type of information the College may collect from another school may include:

- academic records and/or achievement levels
- information that may be relevant to assisting the new school meet the needs of the student including any adjustments

Exception in relation to employee records: Under the Privacy Act, the Australian 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. The College handles staff health records in accordance with the Health Privacy Principles in the Health Records Act 2001 (Vic.).

Anonymity: The School needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate the delivery of schooling to its students and its educational and support services, conduct the job application process and fulfil other obligations and processes. However, in some limited circumstances some activities and interactions with the College may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.

Holding personal information

The school's approach to holding personal information is to ensure that it is stored securely and that access is provided only to persons who need such access. Depending on the nature of the personal information, it may be stored in locked rooms or cabinets (in the case of paper records), on secure digital devices or on the school computer systems with appropriate password protection.

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 consented to, by you.

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 to students enrolled at the College (including educational and support services for the student), exercise its duty of care and perform necessary associated administrative activities which will enable students to take part in all the activities of the College. This includes satisfying the needs of Parents, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the College.

The purposes for which the School 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
- day-to-day administration of the College
- looking after students' educational, social and medical wellbeing
- seeking donations and marketing for the College
- to satisfy the College's legal obligations and allow the College to discharge its duty of care
- to satisfy the College service providers' legal obligations, including the Catholic Education Commission of Victoria Ltd (CECV) and Melbourne Archdiocese Catholic Schools MACS).

In some cases where the College requests personal information about a student or Parent, if the information requested is not provided, 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 and contractors: In relation to personal information of job applicants and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant, or contractor, as the case may be.

The purposes for which the College uses personal information of job applicants and contractors include:

- administering the individual's employment or contract, as the case may be
- for insurance purposes
- seeking donations and marketing for the College
- satisfying the College's legal obligations, for example, in relation to child protection.

Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as Salesian Alumni.

The purposes for which the College uses the personal information of volunteers includes:

- enabling the College to manage the engagement process of volunteers
- for insurance purposes
- satisfying the College's legal obligations, for example, in relation to child protection
- to confirm their suitability and to manage their visits.

Counsellors: The School contracts with external providers to provide counselling and/or psychology services for some students. The Principal may require the counsellor and/or psychologist to inform the Principal or other teachers of any issues the Principal and the counsellor and/or psychologist believe may be necessary for the College to know for the well-being or development of the student who is counselled or other students at the College.

Parish: The School may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising.

Marketing and fundraising: The College treats marketing and seeking donations for the future growth and development of the School as an important part of ensuring that the College continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the College's alumni organisation or, on occasions, external fundraising organisations.

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information and sometimes people's images, may be used for marketing purposes.

Safety and Security Information:

Personal or sensitive information voluntarily provided by staff members, contractors, volunteers, or others, specifically to manage personal safety or security risks at the College. This information may include, but is not limited to:

- Identification details, photographs, or descriptions of individuals who may pose a safety risk to staff or students.
- Details of court-issued orders or legal interventions (for example, Apprehended Violence Orders or Intervention Orders).
- Information relevant to the development and implementation of individual safety plans or emergency management protocols.
- Information provided under this category will be managed confidentially, shared only on a need-to-know basis, and retained only as long as required for effective risk management and community safety.

Who might the College disclose personal information to and store your information with?

The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:

- College service providers which provide educational, support and health services to the College, (either at the College or off campus) including the Catholic Education Commission of Victoria Ltd (CECV), Melbourne Archdiocese Catholic Schools (MACS), specialist visiting teachers, volunteers, counsellors, psychologists, sports coaches and providers of learning and assessment tools

- third party service providers that provide online educational and assessment support services, document and data management services, training and support services, hosting services, and software-as-a-service applications, such as the Integrated Catholic Online Network (ICON), Microsoft, and Google G Suite, where necessary, to support the training of selected staff in the use of these services
- CECV and Melbourne Archdiocese Catholic Schools, authorised agencies and organisations to discharge its responsibilities under the Australian Education Regulation 2013 (Regulation) and the Australian Education Act 2013 (Cth) (AE Act) relating to students with a disability including Nationally Consistent Collection of Data (NCCD) quality assurance processes, participation in the Australian Early Development Census (AEDC) and government audits
- authorised organisations and persons who support the College by providing consultative services or undertaking assessments for the purpose of educational programming or providers of health services such as counsellors, psychologists, school nursing services, dental vans. Specific consent is obtained to collect and disclose this type of sensitive and health information as part of a service request which may include release of relevant medical or allied health reports, educational planning and evaluation documents such as personalised learning/behaviour/medical management plans
- other third parties which the College uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with Parents
- another school including to its teachers to facilitate the transfer of a student
- Federal and State government departments and/or agencies
- health service providers
- recipients of College publications, such as newsletters and magazines
- student's parents or guardians and their emergency contacts
- assessment and educational authorities including the Victorian Curriculum and Assessment Authority (VCAA) and the Australian Curriculum, Assessment and Reporting Authority (ACARA)
- anyone you authorise the College to disclose information
- anyone who we are required or authorised to disclose the information to by law, including under child protection and information sharing laws.

Nationally Consistent Collection of Data on School Students with Disability

The College is required by the Australian Education Regulation 2013 (Cth) and Australian Education Act 2013 (Cth) to collect and disclose certain information to inform the Students with a Disability (SwD) loading via the NCCD. The College provides the required information at an individual student level to an approved authority. Approved authorities must comply with reporting, record-keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

Sending and storing information overseas

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or a student overseas tour. However, the College will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual; or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The College may from time to time use the services of third-party online service providers (including for the delivery of services and third-party online applications, or Apps relating to email, instant messaging and education and assessment, such as Microsoft Teams and Outlook) which may be accessible by you. Some personal information, including sensitive information, may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.

College personnel and the College's service providers, CECV and its service providers, may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering the system and services ensuring their proper use.

The school makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed and stored outside Australia, in connection with any cloud and third-party services and will endeavour to ensure the cloud is located in countries with substantially similar protections as the APPs.

Where personal and sensitive information is retained by a cloud service provider on behalf CECV and/or MACS to facilitate Human Resources and staff administrative support, this information may be stored on servers located in or outside Australia.

Otherwise, it is not practicable to specify in this policy the countries in which overseas recipients of personal information are likely to be located.

How does the College's 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

The College's staff 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 the College 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. This includes responding to any incidents which may affect the security of the personal information it holds. If we assess that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, we will notify them and the Office of the Australian Information Commissioner of the breach.

It is recommended that parents and the school community adopt secure practices to protect themselves. You should ensure that all passwords you use are strong and regularly updated and that your log in details are kept secure. Do not share your personal information with anyone without first verifying their identity and organisation. If you believe any of your personal information has been compromised, please let the College know immediately.

Access and correction of personal information

Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information and health records respectively which the College holds about them and to advise the College of any perceived inaccuracy. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

There are some exceptions to the access rights set out in the applicable legislation.

To make a request to access or to update any personal information the College holds about you or your child, please contact the Principal or Business Manager by telephone or in writing. The College may require you to verify your identity and specify what information you require. 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 we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

There may be circumstances where the reason for refusal is not provided, if doing so may breach the privacy of another person.

Consent and rights of access to the personal information of students

The College respects every Parent's right to make decisions concerning their child's personal information.

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. The College will treat consent given by Parents 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 or Business Manager by telephone or in writing. However, there may 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 by the College 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 be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Enquiries and complaints and contact details

If you would like further information about the way the College manages the personal information it holds about you, or wish to complain that you believe that the College has breached its privacy obligations, please contact the Principal by writing or telephone at principal@scr.vic.edu.au or (03) 9744 0000. The School will investigate your complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

If you are not satisfied with the College's decision you may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are:

GPO Box 5218, Sydney, NSW 2001

Telephone: 1300 363 992

www.oaic.gov.au

How to contact Salesian College Sunbury

Salesian College Sunbury can be contacted about this Privacy Policy or about personal information generally, by:

- Emailing privacy@scr.vic.edu.au
- Calling 03 9744 0000
- Writing to our Privacy Officer at 1 Macedon Street, Sunbury, VIC 3429.

Changes to our privacy and information handling practices

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.

Acknowledgement:

Catholic Education Commission of Victoria Ltd (CECV)

Status of Document	Date(s)	Modification Details
Written by: Catholic Education Commission of Victoria Ltd (CEVN)	28/02/2020	
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