



## PRIVACY POLICY

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

- We are 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.

### PREAMBLE

This statement outlines the College's policy on how the College uses and manages personal information provided to or collected by it.

### POLICY AIMS

The College Privacy Policy has been developed to provide clear guidelines on how information collected and held by the College will be used and stored. In dealing with personal and sensitive information about individuals, the Salesian College is bound by the Privacy Act 1988 (Cth), the National Privacy Principles (NPPs) in the Privacy Amendment (Private Sector) Act 2000 (Cth), the Health Records Act 2001 (Vic) and the Health Privacy Principles in the Health Records Act 2001 (Vic). This policy describes the way the College uses and manages personal information provided to or collected by it in accord with these principles and laws. In this policy a reference to 'information' is a reference to both personal and health information.

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

### GUIDING PRINCIPLES

The key principles which guide the College with regards to Privacy can be found within the Privacy Act 1988 (Cth), the National Privacy Principles (NPPs) in the Privacy Amendment (Private Sector) Act 2000 (Cth) and the Health Records Act 2001 (Vic) and the Health Privacy Principles in the Health Records Act 2001 (Vic).

### POLICY DETAILS

#### 1. COLLECTION OF PERSONAL INFORMATION

The type of information Salesian College collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- pupils and parents and/or guardians before, during and after the course of a pupil's enrolment at the College;
  - name, contact details (including next of kin), date of birth, previous school and religion;
  - medical information (e.g. details of disability and/or allergies);
  - 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 court orders;
- volunteering information (including working with children checks); and
- photos and videos at school events.
- job applicants, staff members, volunteers and contractors; including:
  - name, contact details (including next of kin), date of birth and religion;
  - information on job application
  - professional development history;
  - salary and payment information, including superannuation details;
  - medical information (e.g. details of disability and/or allergies and medical certificate);
  - complaint records and investigation reports;
  - leave details;
  - photos and videos at school event;
  - work emails and private email (when using work email address) and internet browsing history; and
- 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 School.

**Personal Information collected:** The College will generally collect personal information by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, and telephone calls. On occasions people other than parents and pupils provide personal information.

**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.

**Exception in relation to employee records:** Under the Privacy Act the National 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 College 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 pupil and its education and support services, conduct 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.

## 2. USE OF THE PERSONAL INFORMATION

Salesian College will use personal information it collects from people 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 to which people have consented.

**Pupils and Parents:** In relation to personal information of pupils and parents, the College's primary purpose of collection is to enable the College to provide schooling for the pupil. This includes satisfying both the needs of parents and the needs of the pupil throughout the whole period the pupil is enrolled at the College (including education and support services for the pupil), exercise its duty of care and perform necessary associated administrative activities which will enable pupils to take part in all the activities of the School. This includes satisfying the needs of Parents, the needs of the pupil and the needs of the School throughout the whole period the pupil is enrolled at the School.

The purposes for which the College uses personal information of pupils and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration;
- looking after pupils' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the school;
- to satisfy the College's legal obligations and allow the discharge of its duty of care.

In some cases, where the College requests personal information about a pupil or parent, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity.

**Job applicants, staff members and contractors:** In relation to personal information of job applicants, staff members and contractors, the school's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

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

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

**Volunteers:** The College also obtains personal information about volunteers who assist it in its functions or conduct of associated activities to enable the College and the volunteers to work together.

Volunteers working on behalf of the College, for example parents, will be made aware of the Privacy Policy Principles and will be expected to adhere to the guidelines in relation to the treatment of personal information.

**Parish:** The College may disclose personal information to the student's parish to facilitate religious and sacramental programs, and to keep the school community informed about matters relating to the Parish, its groups, activities and work.

**Marketing and fundraising:** The College treats marketing and seeking donations for the future growth and development as an important part of ensuring that the College continues to be a quality learning environment in which both pupils and staff thrive. Personal information held by the College may be disclosed to an organisation that assists in fundraising, for example, the Parents and Friends or alumni organisation.

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

### 3. DISCLOSURE OF PERSONAL INFORMATION

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

- school service providers which provide educational, support and health services to the College, including the Catholic Education Commission of Victoria Ltd. (CEVN), Catholic Education Offices, specialist learning teachers, volunteers, counsellors, sports coaches, and providers of learning and assessment tools;
- third party service providers that provide online educational and assessment support services or applications to schools and school systems;
- other third parties which the school uses to support or enhance the educational or pastoral care services for its students;
- another school including its teachers to facilitate the transfer of a student;
- government departments;

- your local parish;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers and sports coaches;
- recipients of College publications, like newsletters and magazines;
- pupil's parents or guardians and their emergency contacts;
- assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority;
- anyone who people authorise the College to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

**Sending information overseas:** The College will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the National Privacy Principles.

The school may also store personal information including sensitive information in the 'cloud'. This means that the information is held on the servers of third party cloud service providers engaged by the College. The servers may be situated in or outside of Australia.

The countries in which servers and other third party service providers may be located are:

- United States of America

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 application, or Apps relating to email, instant messages and education and assessment, such as CareMonkey which may be accessible to 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.

The College has made reasonable efforts to be satisfied about the protection of any personal information that cloud and third party service providers collect and process or hold outside Australia as not all countries are bound by laws which provide the same level of protection as the APPs.

School personnel, the CECV and the 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.

Personal and sensitive information retained by a cloud service provider on behalf of CECV to facilitate HR and staff administrative support is currently stored on servers located within Australia.

#### **4. TREATMENT OF SENSITIVE INFORMATION**

In referring to 'sensitive information', Salesian 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 belief, sexual orientation or practices, or criminal record, that is also personal information; and health 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 individuals agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

#### **5. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION**

Salesian College staff are required to respect the confidentiality of pupils' and parents' personal information and the privacy of individuals. Student information is kept on a secure database and paper information in a central student file. All archival information is securely stored for a specified period. Salesian College has in place steps to protect the personal information the school holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

## 6. UPDATING PERSONAL INFORMATION

Salesian College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the College by contacting the Principal's Secretary of the school at any time. The National Privacy Principles require the school not to store personal information longer than necessary.

## 7. THE RIGHT TO ACCESS PERSONAL INFORMATION

Under the Commonwealth 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. There are some exceptions to this set out in the Act. Pupils will generally have access to their personal information through their parents, but older pupils may seek access themselves.

To make a request to access any information the College holds about individuals, please contact the College Principal in writing.

The College may require individuals to verify their identity and specify what information they require. The College may charge a fee for access and will advise the likely cost in advance. If the College cannot provide you with access to that information, the College will provide you with written notice explaining the reasons for refusal.

## 8. CONSENT TO ACCESS TO THE PERSONAL INFORMATION OF STUDENTS

Salesian College respects every parent's right to make decisions concerning their child's education.

Generally, the College will refer any requests for consent and notices in relation to the personal information of a pupil to the pupil's parents. The College will treat consent given by parents as consent given on behalf of the pupil, and notice to parents will act as notice given to the pupil.

Parents may seek access to personal information held by the College about them or their child by contacting the College Principal. However, there will 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 pupil.

The College may, at its discretion, on the request of a pupil grant that pupil access to information held about them, or allow a pupil 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 pupil and/or the pupil's personal circumstances so warranted.

## 9. ENQUIRIES

If individuals would like further information about the way Salesian College manages the personal information it holds, please contact the College Principal.

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