



PRIVACY POLICY

POLICY STATEMENT

Salesian College will manage and protect personal information collected in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the 13 Australian Privacy Principles (APPs), the requirements of the Health Records Act 2001 (Vic.) and the Health Privacy Principles in that Act.

POLICY SYNOPSIS

Salesian College Chadstone collects personal information about members of its community and the wider community – this information may be collected electronically. The Privacy Policy sets out how the College manages this personal information provided to or collected by it.

The College will 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.

VERSION CONTROL

Prepared by	Business Manager
Version	1.1
Approved by	Salesian College Chadstone Board
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ISSUE HISTORY

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5/02/2024	Business Manager	1.0	Update regarding sharing of information to third party service providers

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RATIONALE

Salesian College values the privacy of all stakeholders and is committed to protecting the information it collects. The College is governed by the Australian Privacy Principles that form the cornerstone of the privacy protection framework in the Privacy Act 1988 and adheres to the Health Records Act 2001.

SCOPE

This policy and guidelines outline the circumstances in which Salesian College obtains personal information, how we use, store, dispose, secure and disclose information and how we manage requests to access and/or change information.

GUIDELINES

These guidelines outline the circumstances in which we obtain personal information, how we use and disclose that information and how we manage requests to access and/or change that information.

What kinds of personal information does Salesian College collect and how does the College collect it?

The College collects and holds personal information, including health and other sensitive information, about:

- Students and Parents / Guardians / Carers ('Parents') before, during and after the course of a student's enrolment at the College including:
 - Name, contact details (including next of kin), date of birth, gender, language background, previous College and religion
 - Parents' education, occupation and language background
 - Medical information (e.g. details of disability and/or allergies, and details of any assistance the student receives in relation to those disabilities, medical reports, names of doctors)
 - Conduct and complaint records, or other behaviour notes, College attendance and College 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)
 - Photos and videos at College 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 certificates)

- Complaint records and investigation reports
- Leave details
- Photos and videos at College events
- All electronic data stored on the College network
- 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.

How do we use Personal Information?

Salesian College only uses personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected or for an activity or purpose for which consent has been given.

Our primary uses of personal information include, but are not limited to:

- providing education, pastoral care, extra-curricular and health services
- satisfying our legal obligations including our duty of care and child protection obligations
- keeping Parents informed as to College community matters through correspondence, newsletters and magazines
- marketing, promotional and fundraising activities
- supporting the activities of College associations such as the Salesian College Past Pupils Association
- supporting community-based causes and activities, charities and other causes in connection with the College's functions or activities
- helping us to improve our day-to-day operations including training our staff
- systems development; developing new programs and services; undertaking planning, research and statistical analysis
- College administration including for insurance purposes and fee collection/administration
- the employment of staff
- the engagement of volunteers.

We will only use or disclose sensitive or health information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

We may share personal information to related bodies corporate, but only if necessary for us to provide our services. This may include sharing information to a third party service provider to deliver a service on behalf of the College. The College may disclose information about an individual to overseas recipients only when it is necessary, for example to facilitate a student exchange program. The College will not however send information about an individual outside of Australia without their consent.

Personal Information you provide: The College 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. 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 College. The type of information the College may collect from another College may include:

- academic records and/or achievement levels
- information that may be relevant to assisting the new College 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 College needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate the delivery of College operations to its students and its educational and support services, conduct the job application process and fulfil other obligations. However, in some limited circumstances some activities and interactions with the College may be done anonymously where practicable, such as making an inquiry, complaint or providing feedback.

How will the College use the personal information provided?

The College will use personal information it collects 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 you have consented.

Students and Parents: In relation to personal information of students and Parents, the primary purpose of collection is to enable us to provide operations for students (including educational and support services) and to exercise our duty of care.

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

- to keep Parents informed about matters related to the student, through correspondence, newsletters and magazines
- day-to-day administration
- looking after students' educational, social and medical wellbeing
- seeking donations and marketing
- seeking feedback from students and Parents on our performance and improvement
- to satisfy legal obligations and allow the College to discharge its' duty of care
- to satisfy the College service providers' legal obligations, including the Victorian Catholic Education Authority Ltd (VCEA) 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
- for insurance purposes
- seeking donations and marketing
- satisfying the College's legal obligations, for example, in relation to child protection legislation.

Volunteers: The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as past pupils, to enable the College and the volunteers to work together, to confirm their suitability and to manage their visits.

Counsellors: The College contracts with external providers to provide counselling services for some students. The Principal may require the Counsellor to inform him or her or other teachers of any issues the Principal and the Counsellor 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.

Marketing and fundraising: Marketing and seeking donations for College improvements and charitable purposes. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the Parents' Association.

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.

Who might the College disclose personal information to and store 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 VCEA, MACS, specialist visiting teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools.
- Third party service providers that provide online educational and assessment support services, outsourced fee collection or other administrative services, College improvement surveys, document and data management services, or applications to College information systems.
- VCEA, and MACS, 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. 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
- Other educational institutions including to its teachers to facilitate the transfer of a student
- Federal and State government departments and agencies
- Health service providers
- Recipients of College publications, such as newsletters and magazines
- Students, parents, guardians or carers and their emergency contacts
- Assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority (ACARA), Victorian Curriculum and Assessment Authority (VCAA)
- Anyone who we are required or authorised to disclose the information to by law, including the Family Violence Information Sharing Scheme.

Nationally Consistent Collection of Data on College Students with Disability

The College is required by the Federal Australian Education Regulation (2013) and Australian Education Act 2013 (Cth) (AE Act) to collect and disclose certain information under the Nationally Consistent Collection of Data (NCCD) on students with a disability. The College provides the required information at an individual student level to MACS and the CVCEA, as 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 College exchange. 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 use the services of third party online services who may be located in or outside Australia.

College personnel and the College's service providers, and the VCEA and its service providers, have the ability to access, monitor, use or disclose emails, communications, documents and associated administrative data for the purposes of administering the system and services ensuring their proper use.

The College 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 Australian Privacy Principles (APP).

The countries in which the servers of cloud service providers and other third party service providers are located may include:

- All third party providers are located in Australia

Where personal and sensitive information is retained by a cloud service provider on behalf of VCEA to facilitate Employee Relations, this information may be stored on servers located in or outside Australia.

How does the College 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 agreed 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 held 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 the College assesses that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, notification will be made to the Office of the Australian Information Commissioner of the breach.

It is recommended that Parents and the College community adopt secure practices to protect themselves. Individuals should ensure that all passwords used are strong and regularly updated and that log in details are kept secure. Do not share personal information with anyone without first verifying their identity and organisation. Should the individual believe any information has been compromised, they should notify the College immediately.

Access and correction of personal information

Under the Privacy Act (1988) and the Health Records Act (Vic.)(2001), 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 Assistant Principal – Students or Business Manager. The College may require the verification of identity and specify information required. The College may charge a fee to cover the cost of the application. If the information sought is extensive, the College will advise the likely cost in advance. If the College cannot provide access to that information, it will provide written notice explaining the reasons for refusal.

Consent and rights of access to the personal information of students

The College respects every Parent's right to make decisions concerning a student's education.

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 Assistant Principal - Students or Business Manager. 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 an individual, or wish to inform the College that it has possibly breached its privacy obligations, please contact the Principal in writing. The College will investigate the alleged privacy breach and provide a resolution as soon as is practicable after it has been made.

If you are not satisfied with the College's decision a complaint may be made 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

LEGISLATION

Health Records Act
Privacy and Data Protection Act 2021

RELATED POLICIES

Child Safety and Wellbeing Records Keeping Policy

STANDARD COLLECTION NOTICE



Salesian College collects personal information, including sensitive information about students and parents / guardians / carers and family members before and during the course of a student's enrolment at the College. The College only collects and uses personal information that is reasonably necessary for one or more of our functions or activities.

1. This may be in writing or in the course of conversations and may be direct from the individual or from another source. The primary purpose of collecting this information is to enable the College, Melbourne Archdiocese Catholic Schools (MACS) and the Victorian Catholic Education Authority (VCEA) to meet their educational, administrative and duty of care responsibilities to the student and to enable them to take part in all the activities of the College.
2. Some of the information the College collects is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
3. Laws governing or relating to the operation of a College require certain information to be collected and disclosed. These include relevant Education Acts and Public Health and Child Protection laws.
4. Health information about students (which includes information about any disability as defined by the Disability Discrimination Act 1992) is sensitive information within the terms of the Australian Privacy Principles (APPs) under the Privacy Act 1988. The College may require medical reports about students from time to time and may otherwise collect sensitive information about students and their families.
5. If any personal information requested by the College is not provided, this may affect the College's ability to enrol a student, respond to enquiries, provide the student with educational and support services or allow a person to visit the College.
6. The College may disclose personal and sensitive information for **administrative, educational and support** purposes or may permit the information to be directly collected by third parties. This may include:
 - College service providers such as the VCEA, MACS, College governing bodies and other dioceses
 - third party service providers that provide online educational and assessment support services or applications (apps) or services in relation to College improvement surveys, which may include email and instant messaging
 - College systems and cloud and third party services. Limited personal information[^] may be collected and processed or stored by these providers in connection with these services
 - VCEA and MACS 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 ongoing evaluation of funding adequacy for individual students
 - VCEA to support the training of selected staff in the use of Colleges' systems
 - another College to facilitate the transfer of a student
 - Federal and State government departments and agencies acting on behalf of the government e.g. for audit purposes
 - health service providers, and people providing educational support and health services to the College, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools

- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and the Victorian Curriculum Assessment Authority (VCAA)
 - anyone providing administrative and financial services including fee collection/administration
 - anyone you authorise the College to disclose information to
 - anyone to whom the College is required or authorised to disclose the information to by law, including under child protection laws.
7. The College is required by the Federal Australian Education Regulation (2013) and Australian Education Act 2013 (Cth) (AE Act) to collect and disclose certain information under the Nationally Consistent Collection of Data (NCCD) on students with a disability. The College provides the required information at an individual student level to MACS and the VCEA, as 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.
 8. Personal information collected from students is regularly disclosed to their Parents or guardians.
 9. The College may also use cloud computing service providers to store personal information (which may include sensitive information) on their servers in the 'cloud'. These servers may be located in or outside Australia. This may mean that personal information may be stored or processed outside Australia.
 10. The College makes reasonable efforts to be satisfied about the protection 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 it will be located in countries with substantially similar protections as the Australian Privacy Principles (AAP).
 11. When the College uses any cloud and third party services, some personal information (usually limited to name and email address) about students, parents, guardians or carers may be transferred, stored and processed by overseas. This personal information will be stored and processed in accordance with relevant terms and conditions.
 12. The College's Privacy Policy contains further information about its use of cloud and other third party service providers and any of their overseas locations.
 13. Where personal (including sensitive) information is held by a cloud computing service provider on behalf of VCEA for educational and administrative purposes, it may be stored on servers located within or outside Australia.
 14. College personnel and the College's service providers, and the VCEA and its service providers, may have the ability to access, monitor, use or disclose emails, communications, documents and associated administrative data for the purposes of administering systems and ensuring proper use.
 15. The College's Privacy Policy is accessible via the College website, PAM, handbook, or from the College office. The policy sets out how parents, guardians, carers or students may seek access to, and correction of their personal information which the College has collected and holds. However, access may be refused in certain circumstances such as:
 - a. Where access would have an unreasonable impact on the privacy of others
 - b. Where access may result in a breach of the College's duty of care to the student
 - c. Where students have provided information in confidence.

Any refusal will be notified in writing with reasons if appropriate.

16. The College's Privacy Policy sets out how parents, guardians, carers and students can make a complaint if they believe the College has interfered with their privacy and how the complaint will be handled.
17. The College may engage in fundraising activities. Information received from you may be used to make an appeal to you. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
18. On occasions, information such as academic and sporting achievements, student activities and similar news is published in College newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, College camps and College excursions. The College will obtain permissions from the student's parent or guardian (and from the student if appropriate) prior to publication. . The College may obtain permissions as part of the enrolment process or annually. Permissions obtained at the time of enrolment may apply for the duration of the student's enrolment at the College unless the College is notified otherwise. Annually, the College will remind parents, guardians and carers to notify the College if they wish to vary the permissions previously provided.
19. If you provide the College with the personal information of others, such as other family members, doctors or emergency contacts, we encourage you to inform them:
 - a. You are disclosing that information to the College and why
 - b. That they can request access to and correction of that information if they wish
 - c. That the College's Privacy Policy on our website provides details about information requests and how the College handles the personal information it collects and the complaints it receives.

STUDENT: ONGOING DISCLOSURE & PERMISSION FORM



Student Name

Please retain for future reference

There may be opportunities throughout your time at Salesian College where the College would like to recognise and acknowledge your son's achievements in various forms of media.

Permission is required for the College to publish or disclose images and relevant details for various media purposes. This includes (but is not limited to) permission to publish names, achievements, activities, photographs, recorded video and audio for a range of print and electronic media. The College will abide by the Privacy Act and School Privacy Policy in dealing with such information.

In seeking your permission, the College asks that you please read the following terms and conditions and complete the Ongoing Disclosure and Permission Form below and return to the College. Should you have any questions regarding this form or on any related matters please contact the Development and Marketing Office via email (publicrelations@salesian.vic.edu.au).

Thank you for your continued support.

Sincerely,

Mr Mark Ashmore

Principal

	PERMISSIONS	Some examples (not an exclusive list)
1	Permission for student photo/video to be captured via mobile device or camera and to be published across College print publications.	Griffin Magazine College Year Book College Prospectus Flyers
2.	Permission for student photo/video to be captured via mobile device or camera and to be published in external publications, College website and social media channels.	Newspapers Billboards Schools Guides College Website College Socials (E.g. Facebook, LinkedIn, Instagram)
3	Permission for a photograph of student to be used by Melbourne Archdiocese Catholic Schools (MACS), Victorian Catholic Education Authority Ltd (VCEA) and National Education Access or Licence for Schools (NEALS) for online and printed promotional and educational materials without acknowledgement, remuneration or compensation.	MACS material VCEA material Educational materials available to other schools and education departments around Australia
4	Permission for student photo, name, VCE ATAR Study Score and general achievements (including sporting and cultural successes) to be published in College print publications, external publications and online.	Griffin Magazine College Year Book Newspaper College Website College Socials (E.g. Facebook, LinkedIn, Instagram)

STUDENT: ONGOING DISCLOSURE & PERMISSION FORM



**SALESIAN
COLLEGE**
CHADSTONE EST. 1957

Please return to Salesian College

Student First Name:
Student Last Name:

Year Level 1 **ID**

- We acknowledge and understand the terms and conditions of the Ongoing Disclosure and Permission Form.
- We acknowledge and understand that it is our responsibility to inform the College should we wish to withdraw this authorisation - written notification is required.
- We consent to student's photo/video to be captured via mobile device or camera and published across College print publications.
- We consent to student's photo/video to be captured via mobile device or camera and published in external publications, College website and social media channels.
- We consent to student's photograph to be used by the Melbourne Archdiocese Catholic Schools (MACS), Victorian Catholic Education Authority Ltd (VCEA) and National Education Access or Licence for Schools (NEALS) for online and printed promotional and educational materials without acknowledgement, remuneration or compensation.
- We consent to student's photo, name, VCE ATAR Study Score and general achievements (including sporting and cultural successes) to be published in College print publications, external publications and online.

We do not provide publishing permission for any of the above purposes.

Student Signature _____

Parent/Guardian Signature _____

Parent/Guardian Name _____

Date ____/____/____