Catholic College Sale
PRIVACY POLICY

1.0 POLICY AUTHORITY

The Board of Catholic College Sale Limited (the Board) governs the College. Based on the principle of subsidiarity and in keeping with the Board's Delegations Schedule, the Board delegates a broad range of duties, functions, powers, and authority to the Principal of Catholic College Sale Ltd (the College). This includes the effective implementation of this *Privacy Policy* and the compliance obligations outlined herein.

2.0 INTRODUCTION

The College is committed to taking all appropriate measures to ensure that personal and sensitive information collected or shared by the College is handled sensitively, securely, and in accordance with Federal and State privacy laws.

3.0 PURPOSE AND SCOPE

This Policy explains how the College collects and manages personal information.

This Policy does not apply to the College's handling of employee records, which are exempt under the Australian Privacy Principles (APPs) when handling is directly related to current or former employment relationships between the College and an employee. The College handles employee health records in accordance with the Health Privacy Principles in the *Health Records Act 2001* (Vic.).

All College staff, volunteers, and contractors share responsibility for understanding and observing this Policy and for ensuring that privacy laws and security objectives are met.

4.0 PRINCIPLES

4.1 The College is bound by the *Privacy Act 1988* (Cth) and the APPs in that Act. In relation to health records, the *Health Records Act 2001* (Vic) and the Health Privacy Principles in that Act apply.

4.2 The College is a prescribed Information Sharing Entity (ISE). As such, the College must comply with the Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS) and must act in accordance with the Family Violence Multi-Agency Risk Assessment and Management Framework (MARAM). The CISS and FVISS are designed to complement related child safety obligations, such as those under Victoria's Child Safe Standards under Ministerial Order No.1359.

The CISS and FVISS are designed to complement related child safety obligations, such as those under the Reportable Conduct Scheme and Child Safe Standards. For more information, see: Information Sharing and Family Violence Reforms Contextualised Guidance, Child Information Sharing Scheme Ministerial Guidelines, Family Violence Information Sharing Guidelines, and Family Violence Multi-Agency Risk Assessment and Management Framework.

5.0 DEFINITIONS

Personal information: is information or an opinion, whether true or not, about a person whose identity is apparent, or can reasonably be ascertained, from the information or opinion – that is recorded in any form, for example, a person's name, address, phone number, and date of birth (age). De-identified information about a person can also be personal information.

Health information: is information or opinion about a person's physical, mental, or psychological health or disability, that is also personal information, whether in writing or not. This includes information or opinion about a person's health status and medical history, immunisation status and allergies, as well as counselling records.

Sensitive information: is information or opinion about a set of specific characteristics, including a person's racial or ethnic origin, political opinions or affiliations, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices, or criminal record, that is also personal information. Health information and biometric information about an individual is also sensitive information.

6.0 COLLECTION OF INFORMATION

6.1 Personal information collected

The College collects information about individuals to perform one or more of its functions or activities. In particular, to service, support, resource, govern, operate, manage, and lead, including the employment of Principals and school employees and ownership of school assets.

The kinds of personal information collected and held by the College include:

Students and parents, guardians or carers' information before, during, and after the course of a student's enrolment at the College, including but not limited to:

- name, contact details (including next of kin), date of birth, previous school, and religion;
- parent(s), guardian(s) or carer(s) 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, including counselling reports);
- academic results of students and ongoing performance;
- conduct and complaint records, or other behaviour notes, school attendance, and school reports;
- information about referrals to government welfare agencies;
- counselling reports;
- health fund details and Medicare number;
- any court orders, parenting orders, and/or intervention orders;
- volunteering information (including Working with Children Checks);
- relevant financial information;
- photos and videos at school events.

Job applicants, employees, volunteers, and contractors' information, including:

- name, contact details (including next of kin), date of birth, and religion;
- information provided on a job application;
- professional development history;
- personal information collected via social media platforms, including but not limited to Twitter, Facebook, and LinkedIn;
- salary and payment information, including bank, salary, and superannuation information;
- Police and Working with Children Checks;
- medical information (e.g., details of disability and/or allergies and information contained on medical certificates);
- complaint records and investigation reports;

- leave details;
- photos and videos at school events;
- work emails and private emails (when using work email address) and Internet browsing history.
- Board Members' information
- Information relating to child wellbeing or safety
- Information that may help to assess or manage the risk of family violence.
- 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.

6.2 Nationally Consistent Collection of Data (NCCD) 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 under the Nationally Consistent Collection of Data (NCCD) on students with a disability. The College makes available the required information at an individual student level to the Diocese of Sale Catholic Education Ltd (DOSCEL) and the Catholic Education Commission of Victoria Ltd (CECV) as approved authorities. 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.

The College is required to provide the Department of Education and Training (DET) with the following information about students with a disability without explicitly identifying the student:

- their level of education (i.e., primary or secondary);
- their category of disability (i.e., physical, cognitive, sensory, or social/emotional);
- their level of adjustment (i.e., support provided within quality differentiated teaching, practice, supplementary, substantial, or extensive adjustment);
- Ministerial Council disability guidelines for the year.

The College must undertake financial modelling of funding for particular students with disability, including ongoing evaluation of the adequacy of the funding for individual students under the NCCD. The College must also quality assure its NCCD data before submitting it to DET. The kind of information collected and used for quality assurance purposes may be information that identifies a student, including but not limited to:

- specialist diagnoses reports;
- individualised/personalised learning plans;
- records of assessments.

In addition, the College collects and holds documented written evidence of adjustments undertaken pursuant to the NCCD, as required by the Regulation.

7.0 PERSONAL INFORMATION COLLECTION METHODS

Personal information held about an individual is generally collected by the College through forms, from face-to-face meetings and interviews, in emails, and from telephone calls.

Personal information about students is also collected from other sources, like health care providers, or from another school or other educational body that provides references. This may include academic records, achievement levels, and/or information that may help the College meet the student's needs, including any necessary adjustments.

Personal information may also be collected by the College under the CISS and FVISS following a request for information from another prescribed ISE or following receipt of information that has been voluntarily shared by another ISE. Other ISEs include Victoria Police and family violence specialist services. Information sharing may be authorised or required under CISS or FVISS, where this may promote child wellbeing or safety, and/or to help assess or manage the risks of family violence. (Refer to our *Child and Family Violence Information Sharing Schemes Policy,* accessible from the College website, for further information.)

Anonymous interactions

The College needs to be able to identify individuals with whom they interact 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 or using a pseudonym where practicable, which may include making an inquiry, complaint, or providing feedback.

7.1 College websites and website users

Any information collected via the College websites will only be used for the purpose for which it has been provided. It will not be used for any other purpose without consent.

The College does not provide facilities for the secure transmission of information across the Internet. Users should be aware that there are inherent risks in transmitting information across the Internet.

College websites

When you look at the College website (www.ccsale.catholic.edu.au), the ISP makes a record of your visit and logs the following information for statistical purposes:

- your server address;
- your top-level domain name (for example, .com, .gov, .au, .uk, etc.);
- the date and time of your visit to the site;
- the pages you accessed and documents downloaded;
- the previous site you have visited;
- the type of browser you are using.

Access to information collected by the College website

The College will not attempt to identify its website users by their browsing activities. However, in the unlikely event of an investigation, a law enforcement agency or other government agency may exercise its legal authority to inspect the ISP logs of the websites.

Use of information collected by the College website

Any information collected via the College website will only be used for the purpose for which you have provided it, and it will not be used for any other purpose without your consent. The College may disclose information to other ISEs without the knowledge or consent of any parent, guardian, carer, or student, where this is required or authorised by law (including for the purposes of information sharing under the CISS or FVISS). Where this occurs, the College will seek the views and wishes of any relevant child and/or family members before sharing their information, where it is safe, reasonable, and appropriate to do so. The College website does not provide facilities for the secure transmission of information across the Internet. Users should be aware that there are inherent risks in transmitting information across the Internet.

Cookies

The College website only uses session cookies and only during a search query of the website. On closing your browser, the session cookies set by the College website are destroyed, and no personal information is retained that might identify you should you visit the College website at a later date.

8.0 HOW INFORMATION COLLECTED IS USED AND DISCLOSED

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

- school service providers which provide educational, support, and health services to the College, either at the College or off campus, the CECV, specialist visiting teachers, volunteers, counsellors, sports coaches, and providers of learning and assessment tools;
- 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, guardians or carers;
- third-party service providers that provide educational support services, services in relation to school improvement surveys, document and data management services, training and support services, hosting services, and software-as-a-services applications to schools and school systems (such as Google's G Suite);
- CECV 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;
- another school, including its teachers, to facilitate the transfer of a student;
- State and Federal government departments and agencies;
- medical practitioners and other health service providers;
- recipients of school publications, such as newsletters and magazines;
- a student's parents, guardians or carer and their emergency contacts (about students in their care);
- assessment and educational authorities, including the Victorian Curriculum and Assessment Authority (VCAA) and the Australian Curriculum, Assessment and Reporting Authority (ACARA); and other appropriate educational authorities as required.
- anyone to whom a parent, guardian or carer authorises the College to disclose information;
- anyone to whom the College is required or authorised to disclose the information by law, including for child protection purposes (e.g., for the purposes of sharing information under the CISS or FVISS).

The College may also use personal information it collects to:

- confirm the suitability of volunteers, job applicants, and contractors and administer their work;
- undertake fundraising appeals and marketing activities and communicate with students, parents, guardians or carers to promote the future growth and development of the College;
- communicate to the broader community about the College's activities, events, and student achievements;
- help facilitate religious and sacramental programs;
- help facilitate school exchanges, including overseas;
- meet insurance requirements.

8.1 Overseas disclosures

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, 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 APPs or other applicable privacy legislation.

The College may also store personal information in the 'cloud', which may mean that it resides on servers of third-party cloud service providers situated outside Australia. The countries in which servers and third-party online service providers are located may include, but are not limited to, Singapore, Thailand, Japan, and the USA.

The College may also use the services of third-party online service providers (including for the delivery of third-party online applications or Apps through G Suite for Education or other platforms) to support its delivery of education and pastoral care services.

Only limited personal information will be disclosed.

College employees and authorised IT service provider(s) 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 IT system and services, ensuring their proper use.

The College makes reasonable efforts to be satisfied about the security of any personal information processed and stored outside Australia, as not all countries are bound by laws that provide the same level of protection for personal information provided by the APPs.

Where personal and sensitive information is retained by a cloud service provider on behalf of the College to facilitate educational and administrative support, information may be stored on servers located in or outside of Australia.

9.0 MANAGEMENT, SECURITY, AND ACCESS TO INFORMATION COLLECTED

9.1 Management and security of personal information

The College is required to respect the confidentiality of students' and parent(s), guardian(s) or carer(s) personal information and the privacy of individuals.

The College implements various measures and procedures to protect the personal information it holds from misuse, interference, loss, unauthorised access, modification, or disclosure. These include, but are not limited to, locked storage of paper records, access protocols, password-protected computerised records, high-level security measures, and encryption.

The College will respond to any incidents which may affect the security of the personal information it holds in accordance with the *Privacy Act 1988* (Cth) and the *Privacy and Data Protection Act 2014* (Vic.). If the College assesses that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, the College will notify the affected individual(s) and the Office of the Australian Information Commissioner (OAIC) of the breach.

If concerns exist about the security of personal information held by the College, an individual is advised to notify the College immediately so that appropriate action can be taken.

9.2 Access to and correction of personal information

Under the *Privacy Act 1988* (Cth) and the *Health Records Act 2001* (Vic.), an individual has the right to access personal information which the College holds about them (subject to certain exceptions) and to advise the College of any perceived inaccuracy.

Students will generally be able to access and update their personal information through their

parent(s), guardian(s) or carer(s), but older (mature) students may seek access and correction themselves.

When making a request, an individual may be required to verify their identity and may be charged a fee to cover the cost of verifying the application and locating, retrieving, reviewing, and copying any material requested. If the College cannot provide the information or does not consider it needs correction, the individual will be given a written notice explaining the reasons for the refusal of the request.

9.3 Consent and rights of access to the personal information of students

The College respects every parent, guardian, or carer's right to make decisions concerning their child's education.

Generally, any requests for consent and notices in relation to the personal information of a student will be referred to their parent(s), guardian(s) or carer(s). Consent given by parent(s), guardian(s) or carer(s) will be treated as consent given on behalf of the student. Notice to parent(s), guardian(s) or carer(s) will act as notice given to the student.

At the discretion of the Principal, on the request of a student, that student may be given access to their information or may be allowed to give or withhold consent to the use of their personal information, independently of their parent(s), guardian(s) or carer(s). Normally, this would be done only if the maturity of the student and/or their personal circumstances warrant it.

On occasion, access may be denied, for example, if the release of the information would have an unreasonable impact on the privacy of others, or it may result in a breach of the College's duty of care or other legal obligations to an employee or student.

The College may be required or authorised under the CISS or FVISS to share information with other ISEs without the knowledge or consent of the relevant student or their parent(s), guardian(s) or carer(s). In these circumstances, the College will seek the views and wishes of any relevant student and/or family members before sharing their information, where it is safe, reasonable, and appropriate to do so.

10.0 ENQUIRY AND COMPLAINT PROCEDURES

If further information is sought about the way the College manages the personal information it holds, requests can be directed to the Principal.

If making a privacy complaint, details of the complaint are to be made in writing to the Principal. Receipt of the complaint will be confirmed, and your identity may need to be verified. A response to the privacy complaint and a proposed resolution will usually be provided within 21 days.

The College must ensure it complies with record-keeping obligations in relation to complaints under the CISS, FVISS, and MARAM.

If not satisfied with the response or the decision, an individual may make a complaint to the Office of the Australian Information Commissioner.

GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992 www.oaic.gov.au

The College is expected to collect, use, and manage personal, sensitive, and health information in accordance with procedures in this Policy and relevant legislation, ensuring that the quality and security of the information collected is maintained.

11.0 LEGISLATION AND RESOURCES

- *Australian Privacy Principles*
- *Australian Education Act 2013* (Cth) and *the Australian Education Regulation (2013)*
- *Privacy Act 1988 (Cth)*
- *Privacy and Data Protection Act 2014 (Vic.)*
- *Family Violence Protection Act 2008* (Vic.)
- *Family Violence Protection (Information Sharing) Regulations 2018*
- *Health Records Act 2001* (Vic.)
- *Child Information Sharing Scheme Regulations 2018 (under Part 6A of the Child Wellbeing and Safety Act 2005)* (Vic.)
- Child Information Sharing Scheme Ministerial Guidelines
- Family Violence Information Sharing Guidelines
- Family Violence Multi-Agency Risk Assessment and Management Framework
- Information Sharing and Family Violence Reforms Contextualised Guidance
- State of Victoria, Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Facilities, Ministerial Order No. 1359 (made under the *Education and Training Reform Act 2006* (Vic.)).

12.0 RELATED POLICIES AND DOCUMENTS

- Child and Family Violence Information Sharing Schemes Policy
- Complaints Management Policy
- Privacy Standard Collection Notice

13.0 MONITORING AND REPORTING

The Board is responsible for monitoring the implementation of this Policy and for providing reports as required to the members of the company, i.e., the Bishop of Sale and the Provincial of the Marist Brothers Australia Limited (MSA Ltd).

The Principal is responsible for:

- Ensuring compliance with the obligations outlined in this Policy;
- Assigning authority, responsibility and accountability at appropriate levels within the College for policy implementation and compliance;
- Providing delegated staff with the direction, support and resources necessary to fulfil policy requirements;
- Ensuring cyclic reviews of the policy and recommending to the Board any revisions that may be required to accommodate changes in legislation and diocesan directives;
- Reporting and escalating concerns, issues and policy breaches to the Board and working collaboratively with the Board to resolve them.

14.0 APPROVAL

Approved by	CC Sale Ltd Board
Person(s) Responsible	Principal
Date(s) Reviewed or Updated	August 2025
Next Review Date	August 2027