



# Privacy Policy

## Purpose

CSV Limited and its schools, Casey Grammar School, Balcombe Grammar School and Clyde Grammar (collectively referred to as “CSV” and/or “we” throughout this policy) manage and protect personal information in accordance with the *Privacy Act 1988* (Cth) (“Privacy Act”) and the 13 Australian Privacy Principles (“APPs”), as well as the requirements of the *Health Records Act 2001* (Vic) (“Health Privacy Principles”).

## Scope

This policy outlines 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 is personal information and how do we collect it?

Personal information is information or an opinion about an individual from which they can be reasonably identified. Depending on the circumstances, we may collect personal information from the individual in their capacity as a student, parent, guardian, contractor, volunteer, stakeholder, job applicant, alumni, visitor, or other that comes into contact with CSV.

In the course of providing services, we may collect and hold personal information about:

- Students and parents and/or guardians (“parents”) before, during and after the course of a student’s enrolment at CSV, including:
  - Name, address and contact details, including Next of Kin information.
  - Date of Birth and Gender.
  - Education, previous schools, religion (if any).
  - Medical and Welfare information including:
    - Details of disability and any assistance the student received in relation to those disabilities.
    - Medical reports including as related to allergies and associated Action Plans.
    - Cognitive Assessments.
    - Names of Doctors.
  - Conduct and complaints records, or other behaviour notes, school attendance and school reports.
  - Information about referrals to government welfare agencies.
  - Information obtained during counselling.
- Parents of students before, during and after the course of enrolment at CSV, including:
  - Name, address and contact details.
  - Education, occupation and language background.
  - Health Fund details, including Ambulance subscription details, and Medicare Number.
  - Court orders of which a parent is a party (Family Law and/or Family Violence).
  - Volunteering information (including Working with Children Check).
  - Financial Information.
  - Driver’s License Information.
  - Photos and Videos at School Events.
- Job applicants, staff members, volunteers and contractors, including:
  - Name, address and contact details.
  - Date of Birth and Gender.

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## CSV LTD

ABN 93 061 557 364

### Balcombe Grammar School

389 Nepean Highway  
Mount Martha, Victoria 3934  
Ph. (03) 5970 1100  
[www.balcombegrammar.vic.edu.au](http://www.balcombegrammar.vic.edu.au)

### Casey Grammar School

3 New Holland Drive  
Cranbourne East, Victoria 3977  
Ph. (03) 5991 0800  
[www.caseygrammar.vic.edu.au](http://www.caseygrammar.vic.edu.au)

### Clyde Grammar

110 Smiths Lane  
Clyde North, Victoria 3978  
Ph. (03) 8903 4500  
[www.clydegrammar.vic.edu.au](http://www.clydegrammar.vic.edu.au)

- Education, occupation and language background.
- Religion.
- Information on job application.
- Information provided by a former employer or referee.
- Professional Development History.
- Salary and payment details, including superannuation details.
- Medical information.
- Complaints records and investigation reports.
- Photos and Videos at School Events.
- Workplace surveillance information.
- Work emails and private emails (when using work email address) and internet browsing history.
- Others who come into contact with CSV, including name and contact details and any other information necessary for the particular contact with CSV.

It is noted that employee records are not covered by the Australian Privacy Principles. As a result this Privacy Policy does not apply to CSV's treatment of an employee record where the treatment is directly related to a current or former employment relationship between CSV and employee. CSV handles staff health records in accordance with the Health Privacy Principles.

### Collection of Personal Information

The collection of personal information depends on the circumstances in which CSV is collecting it. If it is reasonable and practical to do so, we collect personal information directly from the individual.

### Solicited Information

CSV has, where possible, attempted to standardise the collection of personal information by using specifically designed forms (e.g. an Enrolment Form or Health Information Disclosure Form). However, given the nature of our operations we also receive personal information by email, letters, notes, via our website, over the telephone, in face-to-face meetings, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring. We may also collect personal information from other people (e.g. a third-party administrator, referees for prospective employees) or independent sources. However, we will only do so where it is not reasonable and practical to collect the personal information from the individual directly.

### Information collected from our websites

We may collect information based on how individuals use our websites. We use "cookies" and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our websites. This information is collected to analyse and improve our websites, marketing campaigns and to record statistics on web traffic. We do not use this information to personally identify individuals.

### Unsolicited Information

We may be provided with personal information without having sought it through our normal means of collection. This is known as "unsolicited information" and is often collected by:

- Misdirected postal mail – letters, notes, documents.
- Misdirected electronic mail – emails, electronic messages.
- Employment applications sent to us that are not in response to an advertised vacancy.
- Additional information provided to us which was not requested.

Unsolicited information obtained by our schools will only be held, used or disclosed if it is considered as personal information that could have been collected by normal means. If that unsolicited information

could not have been collected by normal means, then we will destroy, permanently delete or deidentify the personal information as appropriate.

### Collection of Sensitive Information

Sensitive Information refers to information relating to a persons race or ethnic origin, political opinions or associations, religious beliefs or affiliations, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices including, but not limited to:

- Membership of a professional or trade association;
- Membership of a trade union;
- Sexual preferences or practices.

CSV will only collect sensitive information if it is:

- Reasonably necessary for one or more of these functions or activities, and we have the individual's consent.
- Necessary to lessen or prevent a serious threat to life, health or safety; and/or
- Another permitted health situation.

### How do we use personal information?

CSV will only use personal information it collects for the primary purpose of collection, and for such other purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

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 safety obligations.
- Keeping parents informed as to school community matters through correspondence, newsletters, and/or magazines.
- Marketing, promotional, and/or fundraising activities where specific consent is provided.
- Supporting the activities of CSV associations.
- Supporting community-based causes and activities, charities and other causes in connection with CSV functions or activities helping us to improve our day-to-day operations including training our staff.
- Systems development, including developing new programs and services; undertaking planning, research and statistical analysis.
- School administration including for insurance purposes.
- The employment of staff; and/or
- The engagement of volunteers.

We may disclose information about an individual to overseas recipients only when it is necessary, for example to facilitate a student exchange program. We will not however send information about an individual outside of Australia without their consent.

### Disclosure of Personal Information

Personal information is used for the purposes for which it was given to our schools, or for purposes which are directly related to one or more of our functions or activities.

Personal information may be disclosed to government agencies, other parents, other schools, recipients of school publications, visiting teachers, counsellors and coaches, our service providers, agent, contractors, business partners, related entities and other recipients from time to time, if the individual:

- Has given consent; or

- Would reasonably expect the personal information to be disclosed in that manner.

We may disclose personal information without consent or in a manner which an individual would reasonably expect if:

- We are required to do so by law.
- The disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or public safety.
- Another permitted general situation applies.
- Disclosure is reasonably necessary for a law enforcement related activity.
- Another permitted health situation exists.

### Child Information Sharing Scheme (CISS)

The CISS regime includes legislative principles to guide the collect, use or disclosure of confidential information. It is a principle of the CISS regime that Sharing Entities (ISEs) such as CSV give precedence to the wellbeing of a student over the right to privacy. The use or disclosure of confidential information under the CISS regime is in good faith and with reasonable care and does not constitute a contravention of any other Act. This means that where a disclosure is made in compliance with the CISS, it is not a privacy breach.

### Nationally Consistent Collection of Data (NCCD) on School Students with Disability

CSV is required by the *Australian Education Regulation 2023* and *Australian Education Act 2013* (Cth) to collect and disclose certain information to inform Students with a Disability loading via the NCCD. CSV provides the required information at an individual student level to an approved authority. Approved authorities must comply with reporting, recordkeeping and data quality assurance obligations under the NCCS. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

### Storage, Management and Security of Personal Information

CSV stores Personal Information in a variety of formats including, but not limited to:

- Databases
- Hard copy files
- Personal devices, including laptop computers
- Third party storage providers such as cloud storage facilities (as far as practicable within Australia)
- Paper based files.

CSV takes all reasonable steps to protect the personal information we hold from misuse, loss, unauthorized access, modification, or disclosure.

These steps include but are not limited to:

- Restricting access and user privilege of information by staff depending on their role and responsibilities.
- Ensuring staff do not share personal passwords.
- Ensuring hard copy files are stored in lockable filing cabinets in lockable rooms. Staff access is subject to user privilege.
- Ensuring access to school premises are secured at all times.
- Implementing physical security measures around the school buildings and grounds to prevent break-ins.
- Ensuring our IT and cyber security systems, policies and procedures are implemented and up to date.
- Ensuring staff comply with internal policies and procedures when handling the information.

- Undertaking due diligence with respect to third party service providers and cloud service providers, to ensure as far as practicable that they are compliant with the APPs or a similar privacy regime.
- The destruction, deletion or de-identification of personal information we hold that is no longer needed, or required to be retained by any other laws.

Our public websites may contain links to other third-party websites outside of CSV schools. CSV is not responsible for the information stored, access, used or disclosed on such websites and we cannot comment on their privacy policies.

## Responding to Data Breaches

CSV will take appropriate, prompt action if we have reasonable grounds to believe that a data breach may have or is suspected to have occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC). If we are unable to notify individuals, we will publish a statement of the relevant School's website (or all websites where applicable) and take reasonable steps to publicise the contents of this statement.

## Personal Information of Students

The Privacy Act does not differentiate between adults and children and does not specify an age after which individuals can make their own decisions with respect to their personal information.

At CSV we take a common sense approach to dealing with a student's personal information and generally will refer any requests for personal information to a student's parents/carers. We will treat notices provided to a parents/carers notices provided to students and we will treat consents provided by parents/carers as consent provided by a student where appropriate.

We are however cognisant of the fact that children do have rights under the Privacy Act, and that in certain circumstances (especially when dealing with older students and especially when dealing with sensitive information), it will be appropriate to seek and obtain consents directly from students. We also acknowledge that there may be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents/carers.

There may also be occasions where parents/carers are denied access to information with respect to their children, because to provide such information would have an unreasonable impact on the privacy of others, or result in a breach of the school's duty of care to the student.

## Quality of Personal Information

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up-to-date, including at the time of using or disclosing the information.

If we become aware that the Personal Information is incorrect or out of date, we will take reasonable steps to rectify the incorrect or out of date information.

## Access and correction of Personal Information

You may submit a request to us to access the personal information we hold, or request that we change the personal information. Upon receiving such a request, we will take steps to verify your identity before granting access or correcting the information.

If we reject the request, you will be notified accordingly. Where appropriate, we will provide the reason/s for our decision. If the rejection relates to a request to change personal information, an individual may make a statement about the requested change and we will attach this to their record.

## Destruction of Information

CSV will take all reasonable steps to destroy or de-identify personal information where it is no longer required to be retained in accordance with Legislation.

## Complaints

You can make a complaint about how CSV manage personal information, including a breach of the APPs or the Health Privacy Principles, by notifying us in writing as soon as possible. We will respond to the complaint within a reasonable time (usually no longer than 30 days) and we may seek further information in order to provide a full and complete response.

CSV does not charge a fee for the handling of complaints.

If you are not satisfied with our response, you may refer the complaint to the OAIC. A complaint can be made using the OAIC online Privacy Complaint form or by mail, fax, or email.

A referral to OAIC should be a last resort once all other avenues of resolution have been exhausted.

## How to Contact Us

The CSV Privacy Officer can be contacted by:

Emailing: [privacy@csv.vic.edu.au](mailto:privacy@csv.vic.edu.au)

Calling: (03) 5911 0800

Writing: The Privacy Officer

CSV Limited

3 New Holland Drive

Cranbourne East VIC 3977

## Changes to our Privacy and Information Handling Practices

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on any of our schools' websites regularly for any changes:

- [www.caseygrammar.vic.edu.au](http://www.caseygrammar.vic.edu.au)
- [www.balcombegrammar.vic.edu.au](http://www.balcombegrammar.vic.edu.au)
- [www.clydegrammar.vic.edu.au](http://www.clydegrammar.vic.edu.au)

## Review

This policy is to be reviewed, approved and endorsed every two (2) years, as a minimum.

Last approved February 2024.

Next review February 2026.

*This policy is subject to change without notice at the sole discretion of CSV Limited.*

*Printed hardcopies of this policy are considered uncontrolled.*