

Privacy Policy

1. Background and purpose

The purpose of this policy is to ensure that Catholic Education Commission of Victoria (CECV) protects and handles personal and sensitive information as per legislative requirements. CECV is bound by the Australian Privacy Principles contained in the Australian Privacy Act 1988 (Cth). In relation to health records, CECV is also bound by the Health Records Act 2001 (Vic.) and the Health Privacy Principles in that act. This policy intends to address how CECV complies with these legislative requirements.

2. Scope

This policy applies to all employees and contractors of CECV. It also applies to other people who engage with CECV in the course of undertaking its functions and activities.

3. Policy statement

3.1. Type of personal information that CECV collects and holds

- 3.1.1. CECV collects information from individuals that is necessary for it to perform one or more of its functions or activities related to its role as the peak body of Catholic education in Victoria.
- 3.1.2. CECV may collect and hold personal information, including health and other sensitive information about those who engage with CECV or Victorian Catholic education proprietors such as:
 - a. students, parents and/or guardians (parents)
 - b. job applicants, staff members, and contractors
 - c. members of CECV Board Committees and directors of CECV
- 3.1.3. The type of information collected by CECV from job applicants, staff members, volunteers and contractors may include:
 - a. name, contact details (including next of kin), date of birth and religion
 - b. information on job application, references, qualifications, and employment history
 - c. identity documents and photographs working with children clearances, Victorian Institute of Teaching registration and National Police Record checks
 - d. professional development history
 - e. salary and payment information, including superannuation details
 - f. medical information, (e.g., details of disability and/or allergies and medical certificates)
 - g. complaints records and investigation reports
 - h. leave details
 - i. photos and videos at CECV
 - j. work emails and private emails (when using a work email address) and internet browsing history
- 3.1.4. CECV collects information from other people who come into contact with CECV in the course of undertaking its functions and activities, including name and contact details and any other information necessary for the particular contact with CECV.

3.2. How CECV collects and holds personal information

- 3.2.1. CECV will generally collect personal information about an individual through the following means:
 - a. students – provided to CECV by Catholic education companies through regular monitoring and reporting, or as per legal or regulatory requirements
 - b. parents and prospective parents – provided to CECV by Catholic education companies through regular monitoring and reporting, or as per legal or regulatory requirements
 - c. prospective employees, and contractors – through the recruitment or engagement process, at interviews, from past employers and referees, or during the course of their employment or engagement by CECV.
- 3.2.1. In some circumstances CECV may receive personal information about an individual from a third party, for example, a report provided by a school or service, or a medical professional or a reference from another employer.
- 3.2.1. CECV may collect information through the CECV website. CECV’s internet service provider makes a record of visits and logs the following information for statistical purposes:
 - a. your server address
 - b. your top-level domain name (for example .com, .gov, .au, .uk, etc.)
 - c. the date and time of your visit to the site
 - d. the pages you accessed and the documents you downloaded
 - e. the previous site you have visited
 - f. the type of browser you are using
- 3.2.1. CECV will not attempt to identify 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 CECV’s internet service provider’s logs.
- 3.2.1. CECV will only record email addresses if you a message is sent to CECV. Email addresses will only be used for the purpose for which it has been provided, and they will not be added to mailing lists or used for any other purpose without consent.
- 3.2.1. The CECV 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.
- 3.2.1. The CECV website only uses session cookies and only during a search query of the website. On closing your browser, the session cookie set by the CECV website is destroyed and no personal information is retained which might identify an individual should they visit the CECV website at a later date.

3.3. The purposes for which CECV collects, holds, uses and discloses personal information

- 3.3.1. CECV uses personal information about students and parents collected and held by CECV or provided to CECV to:
 - a. enable CECV to undertake its operational duties as the peak body of Catholic education in Victoria
 - b. identify student needs, develop education programs and support initiatives to assist with students’ learning and wellbeing
 - c. satisfy CECV’s responsibilities, accountabilities, legal and professional obligations including its duty of care to students
 - d. satisfy the legal obligations of CECV including to government authorities and departments

- 3.3.2. CECV uses personal information about job applicants and contractors collected and held by CECV or provided to CECV to:
- assess an applicant's suitability for employment or engagement by CECV
 - administer the individual's employment or contract
 - for insurance purposes
 - satisfying CECV's legal obligations, for example, in relation to child protection and its duty of care to students.
- 3.3.3. CECV may support marketing activities to promote the future growth and development of Catholic schools and early childhood education and care services. CECV may receive personal information held by schools/services for marketing purposes.
- 3.3.4. CECV may disclose personal information, held about an individual to:
- state and federal government departments and authorities in relation to the regulation of schools/early childhood education and care services
 - medical practitioners and health service providers
 - Catholic education proprietors
 - Victorian Catholic education companies
 - third-party service providers that provide support and services to CECV
 - third parties providing services in relation to school/service improvement surveys or pastoral care services to schools and school systems
 - recipients of CECV and/or school/service publications, such as newsletters and magazines
 - anyone who CECV is required or authorised to disclose the information to by law, including under child protection and information-sharing laws
- 3.3.5. CECV 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. These online service providers may be located in or outside Australia.
- 3.3.6. CECV makes reasonable efforts to be satisfied about the protection and security of any personal information processed and stored in the cloud. CECV will endeavour to ensure they will be located in countries which have substantially similar protections as the Australian Privacy Principles.
- 3.3.7. Sensitive information includes a person's racial or ethnic origin, political opinion, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or criminal record. CECV will only collect information of this nature if it is reasonably necessary for its functions and activities and you consent, or it is lawfully authorised or obliged to collect such information. Sensitive information will be used and disclosed by CECV 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.
- 3.3.8. The main consequences for an individual if all or some of the personal information required by CECV is not provided to it, or cannot be collected, include:
- in relation to students and parents, may not be able to provide the educational services that the student requires, including in relation to the student's wellbeing, or properly discharge its duty of care to the student if relevant health or medical information is not disclosed to CECV
 - in relation to prospective employees and contractors, CECV may not be able to fully assess the person's suitability for employment or engagement by CECV or be able to continue to do so.

3.4. Management and security of personal information

- 3.4.1. CECV employees are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.
- 3.4.2. CECV has various methods in place 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 computer records, high-level security measures and encryption.
- 3.4.3. CECV will also respond to any incidents which may affect the security of the personal information it holds. If CECV assesses 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.
- 3.4.4. Any suspicions of compromised personal information should be reported to the CECV Company Secretary as soon as practicable.

3.5. Access and correction of personal information

- 3.5.1. Under the Australian Privacy Act 1988 (Cth) and the Health Records Act 2001 (Vic.), an individual has the right to obtain access to any personal information which CECV holds about them and may request correction of the information. There are some exceptions to the access right set out in the applicable legislation.
- 3.5.2. CECV will only keep personal information for as long as needed for its purposes, or to comply with a law that requires some information to be retained for certain periods of time. When CECV no longer requires this information, it will ensure that it is destroyed or de-identified. However, CECV will retain certain records as part of an archival record of its schools/services, its former students, staff and the school/service communities for historic purposes.
- 3.5.3. Under the Australian Privacy Act 1988 (Cth), the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to CECV'S treatment of employee records unless required by law or organisational policy where the treatment is directly related to a current or former employment relationship between CECV and the employee. CECV handles staff health records in accordance with the Health Privacy Principles in the Health Records Act 2001 (Vic.).

4. Definitions

Browsing activities - any action that you take online, including websites that you visit, terms that you search, links you select, items you purchase online, your IP address, language etc.

Cookies - a packet of data sent by a web server to a browser, which is returned by the browser each time it subsequently accesses the same server, used to identify the user or track their access to the server

Personal information - includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.

Sensitive information - includes a person's racial or ethnic origin, political opinion, religion, trade union or other professional or trade association membership, philosophical beliefs.

5. Related policies and documents

Privacy Procedure (to be developed)

ICT Acceptable Use Policy

ICT Information Security Policy

6. Legislation and standards

[Australian Privacy Act 1988 \(Cth\)](#)

[Health Records Act 2001 \(Vic.\)](#)

7. Policy information

Accountable executive	Executive Director
Policy owner	Company Secretary
Approving authority	CECV Board
Assigned board committee	Audit and Risk Committee
Original Approval date	18/07/2023
Risk Rating	Extreme
Date of next review	18/07/2024
Date Revised	18/07/2023
Publication	CECV Intranet