



## Privacy Policy

### Purpose

CSV Limited, together with its Schools: Casey Grammar School, Balcombe Grammar School and Clyde Grammar (collectively referred to as 'CSV') are committed to protecting the privacy of all personal information held by CSV.

The purpose of this policy is to establish CSV's framework for the handling of personal information, and to ensure that the collection, use, disclosure and management of this information meets the requirements of the *Privacy Act 1988* (Cth) and the *Australian Privacy Principles* (APPs).

### Scope

This policy applies to personal information collected and held by CSV. Personal information is information or an opinion about an individual from which they can be reasonably identified.

Personal information includes, but is not limited to:

- Names, address and contact details, date of birth, emergency contacts, photographic images, attendance records and financial information.
- Sensitive information including nationality, citizenship/visa status, religion, language spoken at home, government identifiers, court orders, employment details, conduct and complaint records and school reports; and
- Health information including medical conditions and records, and special needs or learning requirements.

Personal information is held in relation to:

- Students and parents and/or guardians ('parents') before, during and after the course of a student's enrolment at a CSV School.
- Job applicants, staff, volunteers and contractors; and
- Other people who come into contact with CSV.

Employee Records which directly relate to the current or former employment relationship are exempt from the *Privacy Act 1988* (Cth) and the *Australian Privacy Principles* (APPs). Accordingly, CSV may handle employee records otherwise in accordance with this Policy.

### Personal Information Provided by Individuals

CSV will generally seek to collect any personal information required directly from an individual, unless it is unreasonable or impracticable to do so. Information required may be collected by way of forms, emails, letters, face-to-face meetings, interviews, telephone calls, Learning Management Systems, Consent2Go and/or over the telephone.

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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)

## Personal Information Provided by Others

Where it is unreasonable or impracticable for CSV to collect personal information directly from an individual, personal information may be sought from other individuals (e.g. where a personal reference is required).

Where information is obtained from a third party CSV will take reasonable steps to notify individuals of the collection of that information. Where CSV receives unsolicited information that could not have been lawfully requested, the information will be destroyed or de-identified where it is lawful to do so.

## Website Activity

CSV may collect information based on how individuals use our websites. CSV 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.

## Use or Disclosure of Personal Information

In using or disclosing personal information CSV can only do so for the primary purpose for which it was collected, and/or where there is a specific obligation to do so. CSV's primary use of personal information includes, but is 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.
- Supporting the activities of CSV.
- Systems development, including developing new programs and services; undertaking planning, research and statistical analysis.
- School administration including for fee recovery and insurance purposes.
- The employment of staff; and/or
- The engagement of volunteers.

Where a secondary purpose for the use or disclosure of personal information exists, CSV will only be permitted to do so where:

- The individual has consented; or
- It is reasonably expected by the individual that CSV would use or disclose the information and the information related to the primary purpose of collection (save for sensitive information including health information); or
- Use or disclosure is required or authorised by or under an Australian law or a court/tribunal order; or
- A permitted general situation exists including lessening or preventing a serious threat to life, health or safety; or
- A permitted health situation exists; or

- It is reasonably necessary

CSV may disclose personal information for the above outlined purposes to individuals and entities as required including, but not limited to:

- Third parties such as other schools, government departments, medical practitioners and people providing services to the CSV, such as specialist visiting teachers, sports coaches, counsellors, contractors, volunteers and legal advisors, insurers and auditors in the course of the commercial operations of CSV;
- Parents/guardians and/or CSV community members; and/or
- Anyone to whom a person has provided consent for the disclosure of information.

### Disclosure Required or Authorised by Law

CSV may disclose personal information where required or authorised by law, including where we are compelled to do so to comply with applicable legislation, regulations, court orders, subpoenas, or other legal processes. This may include disclosure to law enforcement agencies, government or regulatory authorities, courts or tribunals, or legal advisors.

### Child Information Sharing Scheme & Family Violence Information Sharing

The Victorian Child Information Sharing Scheme (CISS) and the Family Violence Information Sharing (FVIS) enable the sharing of confidential information between authorised organisations to promote a child's safety or wellbeing.

Under the legislation that governs sharing of relevant information through CISS and FVIS CSV is an information sharing entity ('ISE'). Therefore, CSV can share information with, or seek information from, another ISE without the consent of the student or their family where it is relevant to a student's safety and/or wellbeing.

The use or disclosure of confidential information under the CISS and/or FVIS regime is in good faith and with reasonable care and does not constitute a contravention of any privacy legislation and/or regulations. This means that where a disclosure is made in compliance with the CISS and/or FVIS, it is not a privacy breach.

### 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, unauthorised 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 is 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 who may have access to personal information, including customer identification 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, accessed, 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 on 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 commonsense 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 parents/carers as notices provided to students and we will treat consents provided by parents/carers as consents 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 consent 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 and CSV Records Management Policy.

## Complaints

You can make a complaint about how CSV manages 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.

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) 5991 0800

Writing: The Privacy Officer  
CSV Limited  
Casey Grammar School  
3 New Holland Drive  
Cranbourne East VIC 3977

## Review

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

Last approved May 2026.

Next review May 2028.

*This policy is subject to change without notice at the sole discretion of CSV Limited.  
Printed hardcopies or downloads of this policy are considered uncontrolled.*