



Privacy Policy

Purpose

CSV Limited and 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) the *Australian Privacy Principles* (APPs), and other applicable privacy legislation.

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, addresses and contact details, date of birth, emergency contacts, photographic images, attendance records and financial information.
- Information relating to a student's enrolment, education, academic progress, participation, behaviour, wellbeing and school activities.
- Information relating to complaints, incidents, allegations and investigations.
- 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.
- Health information including medical conditions and records, and special needs or learning requirements; and
- Information collected through digital systems, applications, websites, CCTV, access-control systems, photographs, video recordings and other technologies used by CSV.

Personal information is held in relation to:

- Students and parents and/or carers ('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 where an applicable exemption applies. This does not mean that all information relating to employees is exempt from privacy obligations. CSV will continue to handle employee information appropriately and in accordance with applicable legislation and CSV policies.

CSV LTD

ABN 93 061 557 364

Balcombe Grammar School

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Mount Martha, Victoria 3934
Ph. (03) 5970 1100
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

Clyde Grammar

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

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 or collection from another source is permitted or required by law.

Information required may be collected by way of forms, emails, letters, face-to-face meetings, interviews, telephone calls, Learning Management Systems, Consent2Go and other electronic or digital systems used by CSV.

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 or organisations.

This may include, but is not limited to, information obtained from:

- Parents/carers.
- Schools and educational institutions.
- Medical and allied health professionals.
- Referees.
- Contractors or service providers.
- Professional advisers; and
- Other organisations or individuals, where permitted by law.

Where information is obtained from a third party, CSV will take reasonable steps to notify individuals of the collection of that information, or obtain any necessary consent, where required by applicable privacy legislation. Where CSV receives unsolicited information that could not have been lawfully collected, 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 may use 'cookies' and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed, the internet advertisements which bring visitors to our websites, IP addresses, device information and other information relating to website use. This information may be 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.

Photographs, Video and Other Recordings

CSV may collect photographs, video recordings (including CCTV), audio recordings and other images or recordings for purposes including, but not limited to:

- Documenting school activities and events.
- Education and learning.
- Monitoring the safety and security of CSV property, staff, students and visitors.
- Prevention and investigation of incidents.
- Student identification and administration.
- Publications and communications; and
- Other purposes permitted or authorised by law.

CSV will handle photographs, videos and other recordings as personal information where individuals can reasonably be identified.

Where appropriate, CSV will obtain consent or provide appropriate notice before using or publishing photographs or recordings for particular purposes, such as promotional and marketing activities.

Use or Disclosure of Personal Information

CSV will use and disclose personal information for the purpose for which it was collected, and/or for other purposes permitted or authorised by law.

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, magazines and other communications.
- Supporting the activities of CSV.
- Systems development, including developing new programs and services; undertaking planning, research and statistical analysis.
- School administration, including fee recovery and insurance purposes.
- Managing enrolment and student records.
- Responding to and managing complaints, incidents, allegations and investigations.
- Managing health, wellbeing and student support requirements.
- Ensuring the safety and security of students, staff and other members of the CSV community;
- The employment of staff; and/or
- The engagement and management of volunteers and contractors.

Where a secondary purpose for the use or disclosure of personal information exists, CSV may use or disclose the information where permitted or authorised by applicable privacy legislation. This may include 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 (except in relation to sensitive information, including health information); or
- The use or disclosure is required or authorised by or under an Australian law or a court or tribunal order; or
- A permitted general situation exists, including where the use or disclosure is reasonably necessary to lessen or prevent a serious threat to life, health or safety of an individual or to public health or safety; or
- A permitted health situation exists; or
- The use or disclosure is otherwise permitted or authorised under applicable privacy legislation; or
- The use or disclosure is reasonably necessary to comply with another legal obligation or to exercise or defend a legal right or claim.

CSV will not rely on consent where consent is not required by law or where another lawful basis for collection, use or disclosure applies.

CSV may disclose personal information for the purposes outlined in this Policy to individuals and entities as required or permitted, 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 advisers, 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.

CSV will take reasonable steps to ensure that information disclosed to third parties is relevant to the purpose for which it is disclosed and require that the recipient handles information appropriately.

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, child protection authorities, emergency services or legal advisors.

Child Information Sharing Scheme & Family Violence Information Sharing

The Victorian Child Information Sharing Scheme (CISS) and the Family Violence Information Sharing Scheme (FVISS) enable the sharing of confidential information between authorised organisations to promote a child's safety or wellbeing, and, in the case of FVISS, to assess and manage family violence.

Under the legislation that governs sharing of relevant information through CISS and FVISS, CSV is an information sharing entity ('ISE'). Where the requirements of the CISS or FVISS are satisfied, CSV may collect, use, request or disclose relevant information from another ISE without the consent of the student or their family where permitted under the relevant legislation.

The sharing of information in compliance with CISS or FVISS is not a breach of privacy merely because the information is shared without the consent of the individuals concerned.

CSV will handle information shared under CISS and FVISS in accordance with the relevant legislation.

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 (within Australia)
- Paper-based files; and/or
- Other electronic or digital systems used by CSV.

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 secure locations, with staff access subject to user privilege.
- Ensuring access to school premises is secured at all times.
- Implementing physical security measures around school buildings and grounds to prevent break-ins.
- Ensuring our IT and cyber security systems, policies and procedures are implemented and maintained.
- Ensuring staff comply with internal policies and procedures when handling information, or using third-party systems and service providers.
- 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.
- Providing appropriate privacy and information security training and guidance to staff.
- Regularly reviewing access privileges and security controls.
- Taking reasonable steps to ensure personal information is securely transmitted and stored; and
- Destroying, deleting or de-identifying personal information that is no longer needed or required to be retained by law or CSV's Record Retention Policy.

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 and circumstances of the data breach, this may include: a review of our internal security procedures, taking remedial internal action, notifying affected individuals and notifying the Office of the Australian Information Commissioner (OAIC), where required.

CSV may take other reasonable steps to notify affected individuals where notification is not legally required but is appropriate having regard to the circumstances.

Personal Information of Students

The *Privacy Act* does not differentiate between adults and children and does not specify an age after which individuals can automatically 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 communicate with and seek consent from parents, where appropriate. In determining whether it is appropriate to do so, CSV will have regard to the student's age, maturity and circumstances, the nature and sensitivity of the information, the purpose for which the information is being collected, used or disclosed, and any applicable legal requirements.

CSV acknowledges that children do have rights under privacy legislation and that in certain circumstances, particularly when dealing with older students and sensitive information, it may be appropriate to seek and obtain consent directly from students.

There may also be occasions where a student may give or withhold consent with respect to the use of their personal information independently from their parents. CSV will consider the best interests, safety and wellbeing of the student when determining how personal information is collected, used and disclosed.

There may also be occasions where parents are denied access to information with respect to their children because providing such information would have an unreasonable impact on the privacy of others, would be contrary to the student's rights or interests, would result in a breach of the school's duty of care, or would otherwise be permitted or required under applicable law.

A parent does not have an automatic right to access all information held by CSV about their child.

Third-Party Service Providers, Artificial Intelligence & Emerging Technologies

CSV recognises that third-party services and emerging technologies, including artificial intelligence (AI), may involve the collection, use, analysis or disclosure of personal information.

CSV will undertake reasonable due diligence, considering privacy, information security, child safety and other relevant risks before engaging third-party service providers or implementing new technologies.

Where appropriate, CSV may seek contractual arrangements or undertake a privacy impact assessment to address privacy, confidentiality, information security, data breach notification, access controls, retention and deletion of information, and other relevant factors.

Staff must not enter personal, sensitive, health, student or confidential information into an artificial intelligence system or other third-party technology or third-party system unless the use has been authorised by CSV. Staff should consult the IT Manager for further information.

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 held by CSV is incorrect or out of date, we will take reasonable steps to rectify the information.

CSV encourages individuals to notify us if their personal information changes.

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.

CSV recognises that individuals have rights in relation to accessing their personal information. However, CSV may reject or restrict access to personal information where it:

- Forms part of an internal working document, including, but not limited to, staff notes, observations, internal meeting minutes and investigation notes;
- Is incomplete, preliminary or could reasonably be misinterpreted without context;
- Could compromise an internal investigation or decision-making process; and/or
- Could compromise the privacy, safety and/or wellbeing of others.

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.

Retention & 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 applicable legislation and CSV's Records Retention Policy.

CSV may retain information for longer periods where required or permitted by law, or where reasonably necessary for purposes including, but not limited to:

- Legal proceedings or anticipated legal proceedings.
- Complaints or investigations.
- Insurance purposes.
- Regulatory requirements.
- Child safety or reportable conduct matters.
- Records management requirements; and/or
- Other legitimate organisational purposes.

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 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 will seek to resolve privacy complaints fairly, promptly and in accordance with its complaints handling processes.

If you are not satisfied with our response, or if the complaint remains unresolved, you may refer the complaint to the OAIC where the OAIC has jurisdiction to deal with the complaint.

A complaint can be made using the OAIC online Privacy Complaint Form or by mail, fax, or email.

A referral to the 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

Calling: (03) 5991 0800

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

Individuals may contact the Privacy Officer to:

- Make a privacy enquiry.
- Request access to or correction of personal information.
- Make a privacy complaint.
- Report a suspected privacy incident or data breach; and/or
- Seek further information about how CSV handles personal information.

Review

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

Last approved September 2026.

Next review September 2028.

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