

PRIVACY POLICY

1.0 INTRODUCTION

This Privacy Policy (Policy) provides a formal summary of the manner in which Diocese of Sale Catholic Education Limited (DOSCEL) Office collect, use, disclose and safeguard personal information in compliance with the *Privacy Act 1988* (Cth) and the *Australian Privacy Principles*.

2.0 PURPOSE

This Policy supports the delivery of a sustainable and inclusive education that nurtures each student's potential, equips them to thrive in a dynamic world and is enriched by DOSCEL's flourishing Catholic culture. This Policy is underpinned by the DOSCEL values of *Integrity, Excellence and Inclusion*.

DOSCEL schools and the DOSCEL Office collect personal information to enable the effective governance, operation and delivery of Catholic education. This includes supporting student learning, wellbeing, pastoral care, safety and adherence to statutory and regulatory obligations.

This Policy articulates how the DOSCEL Office collects, handles and protects personal information. For further information see *Appendix 1 – Privacy Policy Information Sheet*.

The DOSCEL Office will handle personal information in accordance with this Policy and applicable laws, including the *Privacy Act 1988* (Cth) (Privacy Act) and the *Australian Privacy Principles* (APPs) under that Act, the *Spam Act 2003* (Cth), and the *Health Records Act 2001* (Vic.).

3.0 CATHOLIC MISSION

DOSCEL brings to life the mission of the Catholic Church by engaging and aligning all efforts toward the achievement of DOSCEL's vision for education: *faith-inspired educational excellence for a hope filled future*.

4.0 COMMITMENT TO CHILD SAFETY

The DOSCEL Office holds the care, safety and wellbeing of children and young people as a central and fundamental responsibility of Catholic education. This commitment is drawn from the teaching and mission of Jesus Christ.

5.0 SCOPE

- 5.1 DOSCEL schools and the DOSCEL Office are required by State and Federal laws like the Education Acts and Regulations, Public Health and Child Protection laws to collect from DOSCEL and disclose personal information to government departments and agencies.
- 5.2 This includes sharing information relating to students with disabilities for the purposes of the Nationally Consistent Collection of Data on students with Disability (NCCD), most of which must be disclosed on a de-identified basis. Annual Ministerial Council disability guidelines for the year may also require access to supporting records for data quality assurance purposes. This is to facilitate appropriate Australian Government funding for schools educating students with disabilities, to the relevant school.
- 5.3 This also includes the DOSCEL schools and the DOSCEL Office disclosing personal information to other prescribed Information Sharing Entities (ISEs) to the extent that this is required or authorised under the Child Information Sharing Scheme (CISS) or Family Violence Information Sharing Scheme (FVISS). Other ISEs include Victoria Police and family violence specialist services. 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 (MARAM)*.
- 5.4 DOSCEL schools and the DOSCEL Office must comply with the CISS and FVISS and must act in accordance with MARAM.
- 5.5 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*.
- 5.6 This Policy applies to DOSCEL schools and the DOSCEL Office. The handling of employee records is exempt to the extent permitted by the *Privacy Act*.
- 5.7 This Policy does not apply to the DOSCEL Offices's handling of employee records, which are exempt under the *Privacy Act* when handling is directly related to current or former employment relationships between DOSCEL, and their respective employees.

6.0 POLICY OUTCOMES

- 6.1 DOSCEL schools and the DOSCEL Office collect only the personal information required for educational, administrative, wellbeing, safety and regulatory purposes.
- 6.2 Personal information collected by DOSCEL schools and the DOSCEL Office includes names, addresses, contact details, demographic information, enrolment information,

behavioural records, academic progress, financial information, and court or parenting orders.

- 6.3 DOSCEL schools and the DOSCEL Office collect information through lawful and fair means, including directly through enrolment forms, interviews, meetings, online platforms and communications, and indirectly from health and allied professionals, previous schools, government agencies, and authorised information-sharing schemes such as the CISS and the FVISS.
- 6.4 DOSCEL schools and the DOSCEL Office comply with State and Federal legislative requirements by collecting and disclosing personal information to government departments and prescribed ISEs, including for the NCCD, and information-sharing obligations under the CISS and the FVISS, to support funding, child safety and regulatory accountability.
- 6.5 Collected information is used to provide educational services, support student safety and wellbeing, administer enrolments, manage school operations, fulfil legal and regulatory requirements, and communicate with parents/guardians/carers and the broader community.
- 6.6 DOSCEL schools and the DOSCEL Office disclose personal information only where necessary and appropriate, including to third-party service providers, government departments, support and health agencies, other educational institutions, and cloud-based service providers, including those located overseas.
- 6.7 DOSCEL schools and the DOSCEL Office implement organisational and technical measures to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. These measures include secure storage for electronic and hard-copy records, restricted access, password protection and encryption, where appropriate.
- 6.8 Individuals may request access to, or correction of, their personal information by contacting the relevant School or the DOSCEL Office. Proof of identity may be required before access is granted or amendments are made.
- 6.9 Privacy-related complaints must be submitted in writing to DOSCEL. Complaints will be acknowledged and considered, and a response provided consistent with the *Complaints and Grievances Policy*. Unresolved matters may be escalated to the Office of the Australian Information Commissioner (OAIC).

7.0 COMMUNICATION

This Policy is available on DOSCEL website and provided to parents upon request.

This Policy is available to staff through the staff portal.

8.0 POLICY INFORMATION

Policy Owner	Governance
Approving Authority	DOSCEL Board
Assigned Board Committee	Culture Ethics and Conduct
Board Approval	20 February 2026
Risk Rating	Medium
Implementation	March 2026
Review Date	2028

POLICY DATABASE INFORMATION

Supporting Documents	Digital Learning and Acceptable Use of Information and Communications Technology Policy Record Keeping Policy Protection of Children Policy Enrolment Policy Social Media Policy Closed Circuit Television Policy
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Privacy Policy Information Sheet

Information Collected

Personal information refers to information or an opinion about an identified individual or an individual who is reasonably identifiable. This may include names, addresses, contact details, demographic information, enrolment information, behavioural records, academic progress, financial information, and court or parenting orders.

Methods of Collection

The DOSCEL Office may collect information directly through enrolment forms, interviews, meetings, online platforms, and communications, and indirectly from health and allied professionals, previous schools, government agencies, and through authorised information-sharing schemes such as the Child Information Sharing Scheme (CISS) or Family Violence Information Sharing Scheme (FVISS).

Use and Disclosure of Information

Collected information is used to provide educational services, support student safety and wellbeing, administer enrolments, manage school operations, fulfil legal and regulatory requirements, and communicate with parents/guardians/carers and the broader community.

Disclosure of information may occur to third-party service providers, government departments, support and health agencies, other educational institutions, and cloud-based service providers, including providers located overseas.

Information Management and Security

The DOSCEL Office implements organisational and technical measures to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. These measures include secure storage protocols for both electronic and hardcopy records, restricted access, password protection, and encryption where appropriate.

Access and Correction

Individuals may request access to, or correction of, their personal information by contacting the DOSCEL Office. Proof of identity may be required before access is granted or amendments are made.

Complaints Process

Privacy-related complaints must be submitted in writing to the DOSCEL Office in the first instance. Upon receipt, the complaint will be acknowledged and considered, and a response will ordinarily be provided within 21 days. If the matter remains unresolved, individuals may escalate the complaint to the Office of the Australian Information Commissioner (OAIC).

Health information

Health information includes, for example, a person's health status and medical history, immunisation status and allergies, as well as counselling records. Health Information is information or opinion about the health, disability or injury of an individual. It also includes

information or opinion about a health service provided, or to be provided to an individual, including the individual's expressed wishes of future provision of health services. Health information also includes any genetic information about an individual that is or could be predictive of the health of the individual, or their genetic relative.

Sensitive information

Sensitive Information is a subset of personal information that includes information about an individual's race or ethnicity, religious beliefs, political opinions, philosophical beliefs, sexual orientation or practices, criminal record, union or professional association membership, health information, and biometric data. Sensitive information is handled with heightened care in accordance with legal requirements.

Privacy Collection Notice

This notice applies to all Diocese of Sale Catholic Education Limited (**DOSCEL**) primary and secondary Catholic schools managed and operated by DOSCEL in the State of Victoria and to DOSCEL Office.

DOSCEL Office collect personal information, including health and other sensitive information, about students, parents, guardians, carers and family members before and during student's enrolment. Information may be collected directly from you or from third parties such as health professionals, previous schools, or other relevant agencies. Some collection is required or authorised by law, including under education and child protection legislation and at DOSCEL in various ways, directly and from other sources such as people and organisations providing instructional services such as sports coaches, educational programs and activities, external training services, guest speakers, volunteers, counsellors and providers of learning and teaching consultancy support and student assessment services.

DOSCEL and DOSCEL Office use this information to process enrolments, provide education and pastoral care (including religious programs), communicate with parents and guardians, manage administration and compliance, ensure student safety, secure funding, and meet reporting obligations. If you do not provide the requested information, we may be unable to enrol or maintain your child's enrolment, respond to enquiries, deliver educational and support services, or secure funding.

After lodgement of the enrolment form, school staff may need to request further information, for example in relation to any parenting orders, health needs, medical conditions or additional learning needs that have been noted on the enrolment form. In addition, it is often useful for parents/guardians/carers to attend a meeting with school staff prior to enrolment to discuss any additional needs your child may have. An interpreter may be organised, if required.

DOSCEL and DOSCEL Office may disclose personal information (including health and other sensitive information) to service providers, government agencies, and other parties who assist us in delivering education and related services. Some service providers may be located overseas, including in countries such as Singapore, Thailand, Japan, and the USA.

Parents/guardians/carers are required to provide specific information about their child during the enrolment process, both at the application stage and if DOSCEL offers your child enrolment. If the information requested is not provided, DOSCEL may not be able to enrol your child.

DOSCEL may share fee status information, including outstanding balances, payment arrangements, and financial assistance details, with another DOSCEL schools, upon application for enrolment to that school, to support continuity of enrolment and financial administration.

For more information, please refer to the *Privacy Policy*. The policy explains how we handle personal information, how you can access or correct your information, and how to make a privacy complaint.

For privacy queries or complaints, contact:

Diocese of Sale Education Limited

Chief Governance Officer

Email: tmulvaney@doscel.catholic.edu.au

Phone: (03) 5614 5118