

1. Definitions

- 1.1 DET – Department of Education and Training
- 1.2 CPS - Coatesville Primary School
- 1.3 Personal Information – information or opinion, whether true or not, about a person whose identity is apparent, or can reasonably be ascertained, from the information or opinion – that is recorded in any form. For example, a person's name, address, phone number and date of birth (age). De-identified information about students can also be personal information.
- 1.4 Health Information - information or opinion about a person's physical, mental or psychological health or disability, that is also personal information – whether in writing or not. This includes information or opinion about a person's health status and medical history, immunisation status and allergies, as well as counselling records.
- 1.5 Sensitive Information - including a person's racial or ethnic origin, political opinions or affiliations, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices; or criminal record. It also includes health information.

2. Purpose

- 2.1 To ensure the protection of information collected by Coatesville Primary School (CPS), in accordance with Victorian Privacy laws.
- 2.2 To explain how CPS collects and manages personal and health information, consistent with Victorian privacy laws.

3. Scope

- 3.1 The Privacy Policy is for parents and staff of CPS.

4. Policy

Information Collected

- 4.1 CPS collects the following types of information;
 - 4.1.1 Information about students and their families, provided by students, their families and others.
 - 4.1.2 Information about job applicants, staff, volunteers and visitors; provided by job applicants, staff members, volunteers, visitors and others.
- 4.2 CPS collects information in a number of ways, including:
 - 4.2.1 in person and over the phone: from students and their families, staff, volunteers, visitors, job applicants and others;
 - 4.2.2 from electronic and paper documentation: including job applications, emails, invoices, enrolment forms, letters to our school, consent forms (for example: enrolment, excursion, Student Support Services consent forms), our school's website or school-controlled social media; and/or
 - 4.2.3 through online tools: such as apps and other software used by our school.

Collection Notices

- 4.3 When CPS collects information, reasonable steps to advise all parties of how the information will be handled are taken. This includes the purpose of the collection, and how to access, update and correct information. For information about students and their families, a collection notice is provided to parents (or students who are mature minors) upon enrolment.

Unsolicited information about you

- 4.4 CPS may receive information about students, parents or staff that they have taken no active steps to collect. If permitted or required by law, CPS may keep records of this information. If not, the information will be destroyed or de-identified when practicable, lawful and reasonable to do so.

Primary purposes of collecting information about students and their families

- 4.5 CPS collects information about students and their families when necessary to:
- 4.5.1 educate students;
 - 4.5.2 support students' social and emotional wellbeing, and health;
 - 4.5.3 fulfil legal requirements, including to:
 - 4.5.3.1 take reasonable steps to reduce the risk of reasonably foreseeable harm to students, staff and visitors (duty of care);
 - 4.5.3.2 make reasonable adjustments for students with disabilities (anti-discrimination law); and/or
 - 4.5.3.3 provide a safe and secure workplace (occupational health and safety law)
 - 4.5.4 Enable our school to:
 - 4.5.4.1 communicate with parents about students' schooling matters and celebrate the efforts and achievements of students; and/or
 - 4.5.4.2 maintain the good order and management of our school
 - 4.5.5 Enable DET to:
 - 4.5.5.1 ensure the effective management, resourcing and administration of our school;
 - 4.5.5.2 fulfil statutory functions and duties;
 - 4.5.5.3 plan, fund, monitor, regulate and evaluate the Department's policies, services and functions;
 - 4.5.5.4 comply with reporting requirements; and/or
 - 4.5.5.5 investigate incidents in schools and/or respond to any legal claims against the Department, including any of its schools.

Primary purposes of collecting information about others

- 4.6 CPS collects information about staff, volunteers and job applicants:
- 4.6.1 to assess applicants' suitability for employment or volunteering;
 - 4.6.2 to administer employment or volunteer placement;
 - 4.6.3 for insurance purposes, including public liability and WorkCover;
 - 4.6.4 to fulfil various legal obligations, including employment and contractual obligations, occupational health and safety law and to investigate incidents; and/or
 - 4.6.5 to respond to legal claims against our school/DET.

Disclosure of information

- 4.7 CPS uses or discloses information consistent with Victorian privacy law, as follows:
- 4.7.1 for a primary purpose – as defined above;
 - 4.7.2 for a related secondary purpose that is a reasonable expectation – for example, to enable the school council to fulfil its objectives, functions and powers;
 - 4.7.3 with notice and/or consent – including consent provided on enrolment and other forms;
 - 4.7.4 when necessary to lessen or prevent a serious threat to:
 - 4.7.4.1 a person's life, health, safety or welfare; or
 - 4.7.4.2 the public's health, safety or welfare
 - 4.7.5 when required or authorised by law – including as a result of our duty of care, anti-discrimination law, occupational health and safety law, reporting obligations to agencies such as Department of Health and Human Services and complying with tribunal or court orders, subpoenas or Victoria Police warrants;
 - 4.7.6 to investigate or report unlawful activity, or when reasonably necessary for a specified law enforcement purpose, including the prevention or investigation of a criminal offence or seriously improper conduct, by or on behalf of a law enforcement agency;
 - 4.7.7 for Department research or school statistics purposes; and
 - 4.7.8 to establish or respond to a legal claim.
- 4.8 A unique identifier (a CASES21 code) is assigned to each student to enable CPS to carry out its functions effectively.

Student transfers between government schools

- 4.9 When a student has been accepted at, and is transferring to, another Victorian government school, CPS transfers information about the student to that school. This may include copies of the student's school records, including any health information. This enables the next school to continue to provide for the education of the student, to support the student's social and emotional wellbeing and health, and to fulfil legal requirements.

NAPLAN Results

- 4.10 NAPLAN is the national assessment for students in years 3, 5, 7 and 9, in reading, writing, language and numeracy. When a student transfers to another Victorian government school, their NAPLAN results are able to be transferred to that next school. Additionally, a student's NAPLAN results are able to be provided to the student's previous Victorian government school to enable that school to evaluate their education program.

Responding to complaints

- 4.11 On occasion CPS, and the Department's central and regional offices, receive complaints from parents and others. CPS and/or the Department's central or regional offices will use and disclose information as considered appropriate to respond to these complaints (including responding to complaints made to external organisations or agencies).

Accessing your information

- 4.12 All individuals, or their authorised representative(s), have a right to access, update and correct information that CPS holds about them.
- 4.13 Accessing student information;

4.13.1 CPS only provides school reports and ordinary school communications to parents who have a legal right to that information. Requests for access to other student information must be made by making a Freedom of Information (FOI) application through the Department's Freedom of Information Unit.

4.13.2 In some circumstances, an authorised representative may not be entitled to information about the student. These circumstances include when granting access would not be in the student's best interests or would breach DET's duty of care to the student, would be contrary to a mature minor student's wishes or would unreasonably impact on the privacy of another person.

4.14 Accessing staff information;

4.14.1 School staff may first seek access to their personnel file by contacting the principal. If direct access is not granted, the staff member may request access through the Department's Freedom of Information Unit.

Storing, securing and destroying information

4.15 CPS takes reasonable steps to protect information from misuse and loss, and from unauthorised access, modification and disclosure. CPS stores all paper and electronic records securely, consistent with the Department's records management policy (see Further Information) and information security standards. All school records are disposed of, or transferred to the State Archives (Public Record Office Victoria), as required by the relevant Public Record Office Standard.

4.16 When using software and contracted service providers to manage information, our school assesses these according to the appropriate departmental processes. One example of this is that staff passwords for school systems are strong and updated on a regular basis, consistent with the Department's password policy.

Updating Information

4.17 CPS endeavours to ensure that information about students, their families and staff is accurate, complete and up to date.

5. Further Information and Resources

5.1 Freedom of Information Unit

Department of Education and Training
2 Treasury Place, East Melbourne VIC 3002
(03) 9637 3961
foi@edumail.vic.gov.au

If you have a query or complaint about privacy, please contact:

5.2 Knowledge, Privacy and Records Branch

Department of Education and Training
2 Treasury Place, East Melbourne VIC 3002
(03) 8688 7967
privacy@edumail.vic.gov.au

5.3 Department of Education and Training - Records management policy

<https://www2.education.vic.gov.au/pal/records-management/policy>

6. Evaluation

6.1 This policy will be reviewed every year as part of the school's regular policy review cycle.