

1.0 Rationale

Kilvington Grammar School (the School) is committed to protecting information we collect, use, disclose, protect and store in the course of providing educational services. We recognise that ensuring good privacy practices helps the School maintain a safe, secure and trustworthy environment for our staff, students and their families, as well as any other individual we interact with.

The Privacy Act 1988 (Cwth) (Privacy Act) regulates the collection, storage, use and disclosure of different types of personal information collected by the School. The School is bound by the Australian Privacy Principles (APPs) encompassed in this legislation.

The School is also bound by the Health Privacy Principles which are contained in the Health Records Act 2001 (Vic) (Health Records Act) when we collect, use, disclose and manage health information.

2.0 Purpose

The purpose of this Privacy Policy (Policy) is to explain how the School collects, uses, discloses protects and stores personal information, including health and other sensitive information, in accordance with privacy laws and principles.

This Policy outlines the rights of staff, and students, as well as parents/guardians/carers (hereinafter referred to as parents) and any other person in relation to their personal information, including health and other sensitive information.

This Policy also sets out how a person can make a complaint in relation to the management of their personal, sensitive and health information, and how the School will deal with their complaint.

3.0 Scope

We believe that maintaining effective privacy measures is a shared responsibility between our staff, students, families and other individuals and organisations who have a connection with the School.

Therefore, all staff, contractors, volunteers, casual relief teachers, visitors, external providers, as well as students, parents or any other stakeholder must comply with this Policy and all privacy laws and principles.

4.0 Review and Communication

The School will review this Policy every 5 years or earlier where there are new laws and technology changes and/or changes to the School's operations and practices.

The current version of this Policy is published on the School's:

- Website.
- Intranet for parents.
- Intranet for students.
- Microsoft Teams Policy Page for staff.

Please check the Privacy Policy on the aforementioned sites regularly for any changes.

4.1 Children's Online Privacy Code

The School will review this Policy in line with the introduction of the Children's Online Privacy Code (the Code) when this has been released. The Code will be in place by 10 December 2026.

5.0 Consent

Where required, the School will seek consent from an individual to voluntarily share information about themselves and/or their child, employee or other person they are authorised for whom to disclose information.

We may ask an individual, including a member of staff, parent, contractor or visitor, to voluntarily agree for their personal information (which may include sensitive and/or health information) to be collected, used, stored and/or shared within the School and with organisations outside the School

The School may ask for an individual's consent:

- In writing
- Online
- Verbally

Some types of consent may be requested at the time of enrolment and then annually such as permission for the School to photography and/or video a student. Other consent may be required for a special event, such as an overnight activity (eg camp) or as part of a Global Connections Program.

We use Consent2Go for students and parents and SAM4Schools for contractors.

Details about how and why School collects, as well as to whom the School shares personal, sensitive and health information are provided in this Policy.

6.0 Child Safety and Wellbeing

6.1 Child Information Sharing Scheme

Under the Child Information Sharing Scheme (CISS), as an Information Sharing Entity (ISE), the School does not require consent from any person to share relevant information.

As the CISS intends for information sharing entities to give precedence to the wellbeing and safety of children over the right to privacy, the School can, subject to meeting the threshold set by the CISS, request and disclose confidential information about any person with any other ISE.

Therefore, any information shared under the CISS is not subject to this Policy provided the School only shares confidential information to the extent necessary to promote the wellbeing or safety of a child or a group of children, consistent with their best interests.

This means the School:

- Forms a view that the request or disclosure is for the purpose of promoting the wellbeing or safety of a child or group of children.
- Forms a reasonable belief that sharing the information may assist the receiving entity to carry out one or more of the following professional activities:
 - Making a decision, an assessment or a plan relating to a child or group of children.
 - Initiating or conducting an investigation relating to a child or group of children.
 - Providing a service relating to a child or group of children.
 - Managing any risk to a child or group of children.
- Is not aware that information falls within an excluded category or that information is not restricted under another law.

Where the School is able to share information in accordance with our existing obligations under the Information Privacy Principles contained in the Privacy and Data Protection Act 2014 (Vic) (PDP Act) and the Health Privacy Principles contained in the Health Records Act 2001 (Vic), we may continue

to do so. The CISS does not affect the collection, use or disclosure of information under this legislation.

Provided it is appropriate, safe and reasonable to do so, the School will seek and take into account the views of the child and their relevant family members when sharing information under the CISS.

The School, in its capacity as an ISE, is also permitted to share information with a child, a person with parental responsibility for the child or a person with whom the child is living, for the limited purpose of managing a risk to the child's safety.

For more information regarding the CISS, [click here](#). For the website: <https://www.vic.gov.au/child-information-sharing-scheme-ministerial-guidelines>

6.2 Family Violence Information Sharing Scheme

Information sharing under the Family Violence Information Sharing Scheme (FVISS) is permitted in certain circumstances under the PDP Act and the Health Records Act. As an ISE, the School must meet its existing obligations under those laws.

Under the Family Violence Protection Act 2008 (Vic) and in its capacity as an ISE, the School has exceptions to existing privacy requirements to assist them to assess or manage family violence risk, including:

- The authority to refuse a perpetrator access to information if it could increase risk to a victim survivor.
- The ability to collect personal or health information about a perpetrator from sources other than the perpetrator without having to notify them or get their consent.

In addition the Victorian Data Sharing Act 2017 (Vic) allows entities, including the School, to collect sensitive information where either authorised or required by law.

In the context of family violence information sharing, this means that the School is not required to obtain consent from a perpetrator or alleged perpetrator before collecting sensitive information about them (such as criminal record information). The School is also not required to gain consent from any person before collecting sensitive information about them in relation to a child victim survivor.

For more information regarding the FVISS, [click here](#). For the website: <https://www.vic.gov.au/family-violence-information-sharing-scheme>

6.3 Mandatory Reporting

Any information reported to the Department of Families, Fairness and Housing (hereinafter referred to as Child Protection) and Victoria Police is not subject to this Privacy Policy and is exempt from privacy laws and principles.

Mandatory Reporters are legally obliged to make a report to Child Protection and Victoria Police if they believe on reasonable grounds that a child is in need of protection from physical injury or sexual as soon as practicable after forming their belief and each time they become aware of any further grounds for their belief.

At Kilvington Grammar School, the following people are Mandatory Reporters:

- The School Principal
- The Director of Business
- All teachers
- Medical practitioners
- Nurses

- School counsellors
- Registered psychologists
- Early childhood workers
- Persons in religious ministry

For details regarding mandatory reporting, please refer to the School's:

- Child Safety and Wellbeing Policy
- Procedures for Managing Child Safety Incidents or Concerns, including Child Safe Complaints, at or involving the School or its Staff, Volunteers or Contractors
- Procedures for Responding to and Reporting Child Safety Incidents or Concerns (including Mandatory Reporting)

6.4 Reportable Conduct

Any information reported to the Social Services Regulator is not subject to this Privacy Policy and is exempt from privacy laws and principles.

The School has a legal obligation to investigate and report to the Social Services Regulator of all incidents or allegations of reportable conduct, or of staff misconduct that may be reportable conduct, as defined in the Child Wellbeing and Safety Act 2005 (Vic).

For details regarding reportable conduct, please refer to the School's:

- Child Safety and Wellbeing Policy
- Procedures for Managing Child Safety Incidents or Concerns, including Child Safe Complaints, at or involving the School or its Staff, Volunteers or Contractors
- Procedures for Responding to and Reporting Child Safety Incidents or Concerns (including Mandatory Reporting)

7.0 Personal, Sensitive and Health Information

7.1 Employee Record held by the School

Under the Privacy Act, the APPs do not apply to the certain treatment of an employee record held by the School, where the treatment is directly related to a current or former employment relationship between the School and the employee. The School handles staff health records in accordance with the Health Privacy Principles in the Health Records Act.

The employee record exemption applies to information that is inherently part of the employment relationship. It includes, by way of example, information held by the School regarding an individual's performance, disciplinary matters, salary and professional memberships.

There may be circumstances where the School is required to disclose personal information and other employee records (including incidents, complaints, performance management or internal investigations) to a governing authority or other agency to comply with our legal or duty of care obligations, such as reportable conduct Social Services Regulator, teacher misconduct (VIT), mandatory reporting incidents (Department of Families, Fairness and Housing Child Protection, Victoria Police, Social Services Regulator), notifiable incidents (WorkSafe). The kind of information disclosed to the third party will depend on the kinds of information stipulated by the third party.

These circumstances are covered under the Privacy Act. For more information refer to Chapter 6: APP 6 Use or disclosure of personal information.

The disclosure of personal information applies to current employees (as above) and former employees (where the School is obligated to disclose personal information to fulfill legal obligations).

7.2 Personal Information

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable regardless of its source or whether the information or opinion is:

- True or untrue.
- Recorded in any material form or not.

Personal information may include an individual's medical records or email address.

7.2.1 De-identified Information

It is the School's policy that, wherever practicable, staff should use and share de-identified information rather than personal information. To be classified as de-identified information, the individual is no longer identifiable either from the information or from the information when combined with other information reasonably available to the School.

Examples of de-identified information include a pseudonym or aggregated data.

7.2.2 Exemptions from Privacy Act

Unless otherwise exempt, a record which includes any personal information contained in a document, electronic or other device is regulated by the Privacy Act.

The following items are excluded from the definition of a record:

- A generally available publication.
- Anything kept in a library, art gallery or museum for the purposes of reference, study or exhibition.

7.3 Sensitive Information

Sensitive information is a type of personal information with stronger legal protections due to the risk of discrimination. As it is given extra protection, the School must treat any sensitive information with additional care.

Sensitive information includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a professional, trade or political association or union, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices or criminal record. It also includes health information and biometric information.

The School will only collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- the School is required or authorised by the law (including under AAPs and/or other relevant privacy legislation) to collect such information.

7.4 Health Information

Due to the nature of the information collected and stored by the School, health information has different and stronger legal protections than personal information.

Health information is a subgroup of personal and sensitive information and is information or an opinion about:

- An individual's health, including illness, disability or injury (at any time).
- An individual's expressed wishes about the future provision of health services.
- A health service provided to the individual, currently or in the future.
- Other personal information collected to provide, or in providing, a health service to an individual.

The School may collect a significant amount of health information about students and staff, and where required, parents. The School recognises that as health information has special protection under the Privacy Act and the Health Records Act, we need to take particular care when collecting, using and disclosing this type of information.

Where the School records an incident relating to a school event and/or on school grounds and where a student suffers an injury, this will constitute collection of health information. This is required if the School is to exercise its duty of care.

Generally the School will only collect health information:

- With the consent of the student or parent(s), depending on the age of the student.
- Where it is required by the School to fulfil our duty of care obligations or otherwise required by law.
- Where it is impracticable to obtain consent and where it is necessary to lessen or prevent a serious threat to the life, health or safety of an individual.

Where a member of School staff provides emergency first aid on a student, these provisions are not intended to apply. Nevertheless, the provisions will apply to health information in any record the School makes of the emergency first aid carried out on the student.

7.5 Health Service

The School provides a health service as defined in the Privacy Act through its employment of a:

- School Nurse.
- School Psychologists.

All personal information collected by the School Nurse and/or School Psychologist to provide a health service to a student must be treated as health information.

7.6 School Psychologists

For information regarding the consent for and scope of the School's psychology services, refer to the School Psychology Services Policy.

For more information about the health information we may collect, refer to the School's Disclosure Statement to Students.

School Psychologists do not have legal privilege in respect of any records made by them in the course of their employment at the School which prevents these records being produced to a court if they are subpoenaed.

As employees of the School, any records of personal information collected or made by School Psychologists in the course of their employment will become records of the School.

The School Principal is able to call for those records which directly pertain to a student of the School in the same way as they may call for the records made by any other School employee which relate to school matters. Those records may also be accessed by the student in accordance with the provisions of the Privacy Act unless they fall into an exception contained in the APPs.

For information regarding access, refer to Section 10 of Part D of the APPs.

7.6.1 Disclosure of Counselling Records

Although the Principal can require the School Psychologist to disclose information obtained in a counselling session to them or other senior staff, the disclosure should be limited to those staff members who have a need to know.

The School Psychologist may need to convey information to the School Principal as they have a legal obligation to receive this information. There may also be circumstances which necessitate the School Psychologist to directly pass on details to other staff which relates to the wellbeing of a student.

If a student discloses sexual assault, communications between the School Psychologist may be protected from disclosure to persons outside the School in criminal proceedings.

7.6.2 Conflict with Professional Associations

The School recognises that the School Psychologists are members of various professional associations and there may be times where a conflict between the Codes of these associations and:

- The School Psychologist's contractual obligations as an employee of the School.
- The provisions of the Privacy Act.

Should these circumstances arise, the Codes of professional associations will not override the School Psychologist's contractual obligations and they must adhere to the requirements prescribed under the Privacy Act.

7.6.3 External Counsellors

The School recognises that parents may engage counsellors in private practice. In these circumstances, as the relationship is between the student, the parents and the Counsellor, the School has no role to play except as requested by the External Counsellor with the authority of the parents or student, or as requested by the parents.

7.6.4 Referrals to External Counsellors

If the School makes a referral of a student to a Counsellor in private practice, we may seek a report from the External Counsellor. Before the External Counsellor can provide the School with any report or other records, the consent of the student (or in this case of a young student, the parent) may be required before that report could be provided.

8.0 Personal Information Collected by the School

We understand the importance of ensuring that the information we collect is not compromised. For more details regarding how the School maintains data, please refer to the School's Data Breach Response Plan.

The types of information the School collects includes (but is not limited to) personal information, including health and other sensitive information.

Generally, we collect information about:

- Students and parents before, during and after the course of a student's enrolment at the School as well as information for unsuccessful applicants for enrolment.
- Job applicants, staff members, volunteers and contractors before, during and after the individual's employment at or engagement with the School. This includes information for unsuccessful applicants for employment.
- Other individuals or organisations that come into contact with the School.

8.1 Personal Information about Students

The School may collect personal information, including health and other sensitive information before, during and after the course of a student's enrolment at the School.

For more information about the personal information we may collect, refer to the School's Privacy Collection Notice for Students and Parents/Guardians.

The types of personal information, including health and other sensitive information, the School may collect in relation to students includes, but is not limited to:

- Full name and preferred name.
- Contact details (such as phone number, residential address).
- Date of birth.
- Next of kin and their contact details.
- Emergency contact and their contact details.
- Gender.
- Language background.
- Previous school.
- Religion.
- Health information, (eg details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical records and names of doctor(s)).
- Results of assignments, tests and examinations.
- Conduct and complaint records, or other behaviour notes, and school reports.
- Information about referrals to government welfare agencies.
- Counselling reports.
- Health fund details and Medicare number.
- Any Family Court orders.
- Criminal records.
- Volunteering information.
- Photos and videos at School events.
- Whether they are on a scholarship or bursary.
- Visa status, including documentation.
- Residency status.
- Australian Government Department of Education Census Collection.
- Australian Government Department of Education Student residential address and other information.

8.2 Personal Information about Parents

The School may collect personal information, including health and other sensitive information before, during and after the course of a student's enrolment at the School.

For more information about the personal information we may collect, refer to the School's Privacy Collection Notice for Students and Parents/Guardians.

The types of personal information, including health and other sensitive information, the School may collect in relation to parents includes, but is not limited to:

- Full name.
- Gender
- Contact details such as phone number and addresses (residential and email).
- Marital status.
- Education, such as qualifications, highest secondary year level.
- Occupation.
- Language spoken at home.
- Nationality.

- Country of birth.
- Visa status, including documentation.
- Residency status.
- Billing details.
- Financial information.
- Photographs.
- Health fund details and Medicare number.
- Any Family Court orders.
- Criminal records.
- Volunteering information, including Working with Children Check card details.
- Australian Government Department of Education Census Collection.
- Australian Government Department of Education Student residential address and other information.

8.3 Personal Information about Job Applicants, Volunteers and Contractors

The School may collect personal information, including health and other sensitive information before, during and after the course of a job student's enrolment at the School.

For more information about the personal information we may collect, refer to the School's Employment Privacy Collection Notice for Job Applicants and Contractor Privacy Collection Notice.

The types of personal information, including health and other sensitive information, the School may collect in relation to job applicants, volunteers and contractors includes, but is not limited to:

- Full name and preferred name.
- Contact details (such as phone number, residential address).
- Date of birth.
- Next of kin and their contact details.
- Religion.
- Information on job application.
- Professional development history.
- Working with Children Check card details.
- Victorian Institute of Teaching card details.
- Salary and payment information , including tax file number, Australian Business Number, bank account details and superannuation fund.
- Health information (eg details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical records, names of doctor(s) and medical certificates).
- Complaint records and investigation reports.
- Leave details.
- Photos and videos at School events.
- Workplace surveillance information.
- Work emails and private emails (when using work email address) and Internet browsing history.
- Australian Government Department of Education Census Collection..

8.4 Other People who Come into Contact with the School

We may collect the name and contact details and any other information necessary for the particular contact from other people who come into contact with the School.

8.5 Employee Records

The School is generally exempt from the Privacy Act when we collect and handle employee records and this Policy does not apply to that information. However, where State or Territory health privacy legislation applies, the School is still required to protect the privacy of employee health information. This Policy will apply in those circumstances.

9.0 Solicited Information

The School collects personal information from you directly and from third parties using a number of methods which are outlined in this Policy.

The School may also collect information based on how individuals use our website. This information is not used to identify individuals.

A 'cookie' is a small string of data or text file stored on your device that helps websites remember information about your visit.

We may use 'cookies' and other data collection methods to collect information on website activity. This may include the:

- Number of visitors
- Number of pages viewed
- Internet advertisements which bring visitors to our website.

10.0 Unsolicited Information

Unsolicited information is personal information provided to the School and where we have not sought it through the methods outlined in this Policy.

Examples of unsolicited information which may be collected by the School include:

- Postal – letters, notes, documents (either misdirected or directed).
- Electronic – emails, SMS, electronic messages (either misdirected or directed).
- Telephone enquiries to reception or other staff.
- Employment applications that are not in response to an advertised job vacancy.
- Additional information provided that was not requested by the School. This information may be supplied by:
 - Police.
 - Government authorities including education or child protection departments or agencies.
 - Medical professionals, including in emergency situations.

The School will only hold, use and/or disclose unsolicited information if it is considered personal information we could have collected using the methods as outlined in this Policy.

If the unsolicited information could not have been collected in this way, the School will destroy, permanently delete or de-identify the personal information as appropriate unless it is otherwise lawful and reasonable for the School to hold, use and disclose that personal information.

11.0 Collection Notices

The Collection Notice may provide more specific details than this Policy. Where the School collects personal information about you, we will take reasonable steps to inform you how and why we may collect this information, and to whom we may disclose this information.

12.0 How the School Collects Personal Information

The collection of personal information depends on the circumstances in which the School is collecting it. Where it is reasonable and practicable, we will collect personal information directly from the individual. As this is not always possible, the School will collect personal information about you from other people or organisations.

12.1 Personal Information You Provide

The School generally collects personal information about a person directly from the individual (or their parent in the case of students).

This includes by way of:

- Forms (electronic and hard copy), such as application and enrolment forms, medical forms, Tax File Number forms.
- Face-to-face meetings and interviews.
- Emails.
- Telephone calls.

12.2 Personal Information Provided by a Third Party

In some circumstances the School may be provided with personal information about an individual from a third party. Examples include, but are not limited to:

- A report provided by a medical professional.
- A reference from another school.
- A referee for a job applicant.
- Working with Children Check card details, Victorian Institute of Teaching card details and contact details.
- Online forms from third parties, such as Enrol HQ, Consent2Go and SAM4Schools.

If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student. For example, school academic reports.

12.2.1 Enrol HQ

The School uses Enrol HQ, a third-party, to manage and streamline enrolment enquiries, open day registrations and communications with prospective families. This information is retained on this platform regardless of whether they enrol at the School.

Enrol HQ collects personal information such as names, contact details, and event attendance data, which is used solely for the purpose of managing enrolment-related activities and communications.

Enrol HQ, through its parent company Team HQ Pty Ltd is bound by the APPs under the Privacy Act. The organisation has in place strict data protection protocols and processes to maintain confidentiality and security of all personal information collected. Enrol HQ uses the cloud service Amazon Web Service to host its products in Australia.

12.3 Personal Information Generated by Artificial Intelligence (AI) Systems

The School may collect personal information by using AI systems to generate it. The kinds of personal information that may be generated by AI systems include those set out above in this Policy in the section Personal Information Collected by the School.

12.4 Personal Information from Other Sources

The School may also collect personal information through surveillance activities (such as CCTV security cameras) and student email monitoring where the student uses a School Email Account.

For more information about student email monitoring, refer to the School's Information Communication Technology Access Policy.

Where a staff member uses a School Email Account and/or a School Login, the School may monitor staff emails and/or browser history.

For more information about staff email and internet monitoring, refer to the School's Information Internet and Email Usage Policy.

13.0 Why the School Collects, Uses and Discloses Personal Information

The purposes for which the School collects, uses and discloses personal information depend on our relationship with the individual.

The School may disclose personal information, including sensitive information, for educational, care and administrative purposes, and to seek support and advice.

13.1 Students and Parents

The purposes for which the School may collect, use and disclose personal information about students and parents include:

- To provide schooling and school activities.
- To satisfy the needs of parents, students and the School throughout the whole period a student is enrolled at the School.
- To make required reports to government authorities.
- To keep parents informed about matters related to their child's schooling, through correspondence, apps, newsletters and magazines (eg *In the Know*, *k-News*).
- As part of the day-to-day administration of the School.
- To look after students' educational, social and health wellbeing.
- To seek donations for the School. For more details, refer to the fundraising section of this Policy.
- To satisfy the School's legal obligations.
- To allow the School to discharge its duty of care.
- To meet the School's obligations as prescribed by Australian Government Department of Education Census Collection.
- To meet the School's obligations as prescribed by Australian Government Department of Education Student residential address and other information.

13.2 Volunteers

The purposes for which the School may collect, use and disclose personal information about volunteers include:

- To contact volunteers about, and administer, their role and responsibilities volunteer position.
- For insurance purposes.
- To satisfy the School's legal obligations, for example, in relation to child protection legislation.

13.3 Job Applicants and Contractors

The purposes for which the School may collect, use and disclose personal information about job applicants and contractors include:

- To assess and (if successful) engage the applicant or contractor.
- To administering the individual's employment or contract.
- For insurance purposes.
- To satisfy the School's legal obligations, for example, in relation to child protection legislation.
- To meet the School's obligations as prescribed by the Australian Government Department of Education Census Collection.

14.0 To Whom Does the School Disclose Personal Information

The School may disclose personal information, including sensitive and health information to a range of organisations and individuals.

This may include to:

- Other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student.

- Government departments (including for policy and funding purposes).
- Medical practitioners.
- People providing educational, support and health services to the school, including specialist visiting teachers, sports coaches, instrumental music teachers, volunteers, and counsellors.
- Overnight Activity Providers, such as camps.
- Global Connections Program Providers, such as Host Schools, Host Families and Travel Agents.
- Organisations that assist us with fundraising. For more information, refer to the fundraising section of this policy.
- Parents and Friends Association (PFA) when registering to volunteer or to sign up to social groups such as WhatsApp.
- Providers of specialist advisory services and assistance to the school, including in the area of Human Resources, child protection, students with additional needs.
- To administer Microsoft Office 365 Apps for Education and ensuring its proper use. For more information, refer to the Sending and Storing Information Overseas section of this Policy.
- Providers of learning and assessment tools.
- Assessment and educational authorities, including the:
 - Australian Curriculum, Assessment and Reporting Authority (ACARA).
 - Victorian Curriculum and Assessment Authority (VCAA).
 - NAPLAN test administration authorities (who will disclose it to the entity that manages the online platform for NAPLAN).
- Agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes.
- People providing administrative and financial services to the school.
- The providers of our information management and storage system and other information technology services, including Synergetic, Consent2Go, Formstack, Schoolbox (KCEE).
- Recipients of school publications, such as newsletters and magazines.
- Students' parents.
- Anyone you authorise the school to disclose information to.
- Anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.
- Australian Government Department of Education

The School may also disclose personal information to a third party as part of the School's use of AI systems. The School uses Microsoft Copilot for AI and data loss protection is activated and monitored using Microsoft Purview.

15.0 How the School Stores Personal Information

We store your personal information in hard copy and electronically.

Information stored in hard copy is stored securely in locked office(s) and, where required, in locked filing cabinet(s) in a locked office with restricted access.

We also use information management and storage systems provided by third party service providers.

Personal information is stored with and accessible by the third party service providers for the purpose of providing services to the School in connection with the systems.

Student and parent personal information is stored on Schoolbox (KCEE) which is hosted on the School's premises. Staff, student and parent personal information (which may include sensitive information and/or health information) is stored in Synergetic, which is hosted on the School premises.

Student and parent personal information (which may include sensitive information and/or health information) are hosted on Consent2Go which is protected by Single Sign On and Multifactor

Authentication. We use a third party (Enrol HQ) to collect and store student and parent personal information as part of an enquiry, application to enrol or to enrol at the School.

Visitors to the School are required to sign in using Passtab. Any personal information collected as part of the sign-in process is stored on Passtab which uses Amazon Web Service that is physically located in Australia. Communication between the Administrator account and the server is encrypted in transit and access to the secure server is restricted to authorised personnel. Passtab does not disclose personal information to overseas recipients.

The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information. For example, we may also store information when recording an incident such as a medical incident, on Formstack. Any personal information (including sensitive information and/or health information) that is recorded on Formstack is stored overseas and is protected by encryption. For more information refer to the Sending and Storing Information Overseas section in this Policy.

16.0 Sending and Storing Information Overseas

The School uses a number of IT systems to collect and store personal information (including sensitive information and health information). We may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications.

Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services and provide technical support. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside of Australia.

An example of such a cloud service provider the School uses is Microsoft 365 for a range of tools including Microsoft Teams, Microsoft Forms, Word, Excel, PowerPoint, Outlook and OneDrive.

The School uses Formstack to record safety (including medical) incidents about staff, students and visitors. This data is stored in servers hosted in United States of America (US). The data is Health Insurance Portability and Accountability (HIPAA) compliant which means it adheres to US Health laws to protect the privacy of health plans and medical data.

In addition, the School uses Seek Limited for job applications. This organisation stores personal information collected by candidates in Australia and with overseas service providers, partners or other third parties in an overseas location.

The School may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate a Global Connections Program or a Year 9 Expedition.

17.0 Fundraising

The School treats seeking donations for the future growth and development of the School as an important part of ensuring that the School continues to provide a quality learning environment in which both students and staff thrive.

Your personal information may be used to make an appeal to you. It may also be disclosed to organisations that assist in the School's fundraising activities, for example, the School's Alumni organisation and, on occasions, external fundraising organisations.

If you do not want to receive fundraising communications from us, please contact our Privacy Officer by emailing privacyofficer@kilvington.vic.edu.au.

18.0 Security of Personal Information

The School has in place steps to protect the personal information the School holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

Staff, student and parent personal information (which may include sensitive information and/or health information) is stored in Synergetic, which is hosted on the School premises. Student and parent personal information (which may include sensitive information and/or health information) are hosted on Consent2Go which is protected by Single Sign On and Multifactor Authentication.

We use a third party (Hero HQ) to collect and store student and parent personal information as part of an enquiry, application to enrol or to enrol at the School.

Any personal information (including sensitive information and/or health information) that is recorded on Formstack is stored overseas and is protected by encryption.

The School may disclose personal information to a third party as part of the School's use of AI systems. The School uses Microsoft Copilot for AI and data loss protection is activated and monitored using Microsoft Purview.

In addition, the School:

- Restricts access to information on the School databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensures all staff are aware that they are not to reveal or share personal passwords.
- Ensures where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- Implements physical security measures around the School buildings and grounds to prevent break-ins.
- Implements ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implements Human Resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertakes due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

19.0 Access and Correction of Personal Information

Under the Privacy Act and the Health Records Act, an individual has the right to seek access to, and/or correction of, any personal information which the School holds about them.

Students will generally be able to access and update their personal information through their parents, but students who are considered to be mature minors may seek access and correction themselves.

There are some exceptions to these rights set out in the applicable legislation.

19.1 Making a Request

To make a request to access, update or correct any personal information (including sensitive information or health information) the School holds about you or your child, please contact the School by post or telephone:

2 Leila Road, Ormond
03 9578 6231

The School may require an individual to verify their identity and specify what information they require.

If the School decides to refuse a request, the School will provide the individual with written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.

20.0 Consent and Rights of Access to the Personal Information of Students

The School respects every parent's right to make decisions concerning their child's education.

Generally, the School will:

- Refer any requests for consent and notices in relation to the personal information of a student to the student's parents.
- Treat consent given by parents as consent given on behalf of the student notice to parents.
- Act as notice given to the student.

Parents may seek access to personal information (including sensitive and health information) held by the School about them or their child by contacting the School Principal or School Nurse by telephone or in writing. For more information, refer to the Access and Correction of Personal Information section in this Policy.

However, there may be occasions when access is denied. Such occasions may include, but are not limited to where:

- The School believes the student has capacity to consent.
- The School is not permitted to disclose the information to the parent without the student's consent.
- The release of the information would have an unreasonable impact on the privacy of others.
- The release may result in a breach of the School's duty of care to the student.

The School may, at its discretion, on the request of a student:

- Grant that student access to information held by the School about them.
- Allow a student to give or withhold consent to the use of their personal information, independently of their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

21.0 Enquiries and Complaints

If you would like further information about the way the School manages the personal information it holds, or wish to complain that you believe that the School has breached the Australian Privacy Principles or the Health Privacy Principles please contact the Privacy Officer by email, post or telephone at:

privacyofficer@kilvington.vic.edu.au
2 Leila Road, Ormond
03 9578 6231

The School will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

22.0 Relevant Legislation, Principles and Schemes

- Australian Education Act 2013
- Australian Education Regulations 2023,
- Australian Privacy Principles
- Child Information Sharing Scheme
- Child Wellbeing and Safety Act 2005
- Family Violence Information Sharing Scheme
- Health Privacy Principles
- Health Records Act 2001 (Vic)
- Health Records Regulations 2023 (Vic)
- Privacy Act 1988 (Cwth)
- Privacy and Data Protection Act 2014 (Vic)

23.0 Related Policies

- Child Safety and Wellbeing Policy
- Data Breach Response Plan
- Information Communication Technology Access Policy.
- References Policy
- School Psychology Services Policy

24.0 Evaluation

Policy Last Reviewed: October 2025 (update in March 2026 for change of name from CCYP to Social Services Regulator)

Approval: The Board

Review: 5 years