



# ***PRIVACY POLICY***

*May 2026*

**CATHOLIC SCHOOLS BROKEN BAY**

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## Purpose

The Privacy Policy (**Policy**) sets out Catholic Schools Broken Bay's (**CSBB**) position on the collection, handling, use, disclosure, storage and management of Personal Information in accordance with relevant privacy legislation.

The Policy informs:

- CSBB staff of their obligations concerning Personal Information
- members of the wider school community about how CSBB manages their Personal Information from initial collection, to permanent deletion and how they may request access to this information. It also provides information on how to make a complaint about how CSBB has managed their information.

CSBB is bound by the Privacy Act 1988 (Cth) (**Privacy Act**) which contains the Australian Privacy Principles.

This Policy will be reviewed periodically and the up-to-date version will be available on our website.

## Definitions

**CSBB:** is Catholic Schools Broken Bay and any school within the CSBB school system.

**Personal Information:** includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.

For example, personal information may include:

- an individual's name, signature, address, phone number or date of birth
- sensitive information
- credit information
- employee record information
- photographs
- internet protocol (IP) addresses

**Sensitive Information:** is Personal Information that includes information or an opinion about an individual:

- racial or ethnic origin
- political opinions or associations
- religious or philosophical beliefs
- trade union membership or associations
- sexual orientation or practices
- criminal record
- health or genetic information

Generally, Sensitive Information has a higher level of privacy protection than other Personal Information.

**Standard Collection Notice:** is a concise statement informing individuals about the purpose for which their Personal Information is collected. CSBB collects Personal Information, including Sensitive Information, about students and parents or guardians before and during a student's enrolment at the school. The primary purpose of collecting this information is to enable the school to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the school.

## Policy

This Policy explains how we collect, hold, store, use, disclose, and dispose of Personal Information.

To help CSBB ensure best privacy management practices, we have adopted the following guiding principles:

- **Clarity and transparency** - our Personal Information handling practices are visible and accessible, ensuring clear processes and escalation procedures for managing Personal Information.
- **Individual controls** – as far as reasonably practicable, we seek to provide stakeholders with choice and control around what happens to their Personal Information, ensuring opt out provisions are in place, when available, for recipients of direct marketing.
- **Collection limitation** - we only collect Personal Information that is reasonably necessary for CSBB's activities in a lawful and fair manner and only collect Sensitive Information with a person's consent - directly from the relevant individual unless impractical.
- **Purposeful data use and disclosure** - we only use or disclose Personal Information for the purpose we collected it, unless the law permits or requires something else. This is made known through CSBB Collection Notices, so that people engaging with CSBB understand the purpose of collection, consequences of non-collection and information regarding third parties with whom CSBB shares the information.
- **Accurate data** – CSBB will take reasonable steps to ensure that information collected is up to date, complete and relevant before it is used or disclosed.
- **Secure protections** - we protect digital and physical Personal Information from misuse, interference and unauthorised access, through a range of physical, technical, and administrative safeguards.
- **Right to access and correction** - we support the right to access, and make corrections to, the Personal Information we hold.

## Information Collected

### What kind of Personal Information does CSBB collect and how does CSBB collect it?

The type of information CSBB collects and holds includes, but is not limited to, Personal Information and Sensitive Information, about staff, students and parents/carers before, during and after the course of a student's enrolment at CSBB.

Personal Information we collect includes:

- names
- addresses and other contact details
- dates of birth
- gender
- next of kin details
- financial information
- photographs, images, videos
- references
- regulatory accreditation
- media references
- driver's licence information
- passport information
- student visa information
- school reports
- academic, attendance and behavioural records

Sensitive Information we collect includes:

- religious beliefs
- nationality, citizenship, country of birth
- racial or ethnic origin
- family and civil court orders
- criminal records
- Health Information
  - medical records and reports
  - health fund information
  - disabilities
  - allergies
  - immunisation details
  - individual health care plans
  - counselling reports and notes,
  - nutrition and dietary requirements.

In some cases, we are legally obliged to collect Personal Information.

You have the right to deal with us anonymously or using a pseudonym, but if you do, or if you do not provide Personal Information that we request, we may not be able to provide some or all of our services.

## **Who do we collect information from and how do we collect it?**

### **Personal Information provided by the individual:**

CSBB will collect Personal Information about an individual by way of forms filled out by parents/carers or students, face-to-face meetings and interviews, emails and telephone calls and via the Compass portal. Forms can be paper-based or online. In the case of online forms, responses will be held securely by CSBB and individuals will be provided with relevant collection notices.

Other methods of collection are through financial transactions and the use of CCTV security cameras. A school also collects Personal Information when a secondary student uses their school issued Compass card, for example, to record attendance.

If an enrolment application is made to more than one CSBB school, the Personal Information provided during the application process may be shared between the schools. This Personal Information may include health information and is used for the purpose of considering, supporting and administering the enrolment of the student within CSBB.

### **Personal Information provided by other people:**

In some circumstances a school may be provided with Personal Information about an individual from a third party, for example, a report provided by a medical professional or a reference from another school.

### **Why do we collect the Personal Information of students and parents/carers?**

In relation to Personal Information of students and parents/carers, a school's primary purpose of collection is to enable the school to provide schooling for students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, to enable students to take part in all the activities of the school.

This includes satisfying the needs of parents/carers, the needs of the student and the needs of CSBB throughout the whole period the student is enrolled at the school.

We may also use Personal Information in school publications, such as newsletters and magazines, which may also include material that assists in the school's fundraising.

If a school requests Personal Information about a student or a parent/carer, if the information requested is not provided, the school may refuse to enrol the student or permit the student to take part in a particular activity.

## **Why do we collect Personal Information of job applicants and contractors?**

In relation to Personal Information of job applicants and contractors, CSBB's primary purpose of collection is to assess and if successful, engage the applicant or contractor. The purposes for which CSBB uses Personal Information of job applicants and contractors include:

- administering the individual's employment or contract
- contact in an emergency
- insurance
- seeking funds for the school
- satisfying CSBB's legal obligations, for example, in relation to child protection legislation.

## **Why do we collect the Personal Information of volunteers?**

CSBB also obtains Personal Information about volunteers who assist schools in their functions or who conduct associated activities, such as ex-student associations or parent advisory bodies, to enable schools and the volunteers to work together.

## **To whom might CSBB disclose Personal and Sensitive Information?**

CSBB may disclose Personal Information, including Sensitive Information, held about an individual for educational and administrative purposes. Sensitive Information will be used and disclosed only for the purpose for which it was provided, unless the individual agrees otherwise, or as required by law.

We may disclose this information to:

- a new school in which a student transfers including from a CSBB Primary School to a CSBB Secondary School to facilitate the transfer of the student
- schools within CSBB where concurrent applications for enrolment are made to those schools
- government departments (including for policy and funding purposes)
- Catholic Schools NSW (**CSNSW**)
- the school's local parish and the Diocese of Broken Bay
- medical practitioners
- people providing educational, support and health services to students, including specialist visiting teachers, counsellors, sports coaches and volunteers
- providers of learning and assessment tools
- providers of specialist advisory services and assistance to the school, including in the area of human resources, child protection and students with additional needs
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (**ACARA**) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)

- agencies and organisations to whom CSBB is required to disclose Personal Information for education, research and consent purposes
- people providing administrative, technology and financial services
- recipients of school publications, such as newsletters and magazines
- students' parents/carers
- anyone to whom we are required to disclose the information by law, including child protection laws.

### **Direct marketing**

You can opt out of direct marketing at any time by emailing [comms@dbb.catholic.edu.au](mailto:comms@dbb.catholic.edu.au) or using the opt out function on any relevant communication we send.

### **Sending and storing information overseas**

A school may disclose Personal Information about an individual to overseas recipients, for instance, to facilitate a school exchange or other overseas excursion. However, a school will not send Personal Information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

CSBB uses centralised information management and storage systems. Some of these systems are provided by the Catholic Education Network (**CEnet**) and others by third party service providers. CEnet is owned by the Catholic Dioceses. Personal Information is stored with and accessible by CEnet and the third-party providers for the purpose of providing services to the school in connection with the systems and for CEnet, administering the education of students.

CSBB may use online or 'cloud' service providers to store Personal Information and to provide online services to the school that use 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 and access their services. This Personal Information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

In some cases, the overseas recipient of Personal Information may not be subject to a binding scheme that has the effect of protecting your information in a way that overall is at least substantially similar to the way in which the Australian Privacy Principles protect your information and there may be no mechanism that you can access to take action to enforce any protection of any law or binding scheme.

## **Management and security of Personal Information**

CSBB staff are required to respect the confidentiality of students' and parents' or carers' Personal Information and the privacy of individuals. Any staff member who is uncertain about their obligations under this Policy should seek clarification from their principal or workstream lead or Privacy Officer.

A failure by a staff member to comply with the important obligations set out in this Policy may result in disciplinary action. CSBB is required to have in place steps to protect the Personal Information the organisation 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 digital records.

CSBB is required to provide a Standard Collection Notice. The collection notice ensures that individuals engaging with CSBB understand the purpose of collecting the information, the consequences of individuals deciding not to provide information (e.g. enrolment decision) and third parties with which or whom CSBB shares the information. CSBB has a Standard Collection Notice that covers enrolment. At times, non-standardised collection notices may be required that cover marketing and other purposes.

### **How to gain access to information held with CSBB?**

Under the Privacy Act, an individual has the right to seek and obtain access to any Personal Information which CSBB holds about them. There are some exceptions to this right set out in the Act.

Parents/carers may request Personal, Sensitive, or Health information about their children that attend a CSBB school, in the absence of court orders to the contrary, or conflicting privacy rights.

Students may request access to their Personal, Sensitive, or Health information that CSBB holds, or request that their Personal Information is not shared with other parties. Requests by students under 18 years of age will be assessed taking into consideration the student's age, maturity, and level of understanding.

Requests for information about students should be directed to the school principal or their delegate.

Requests for staff-related information should be directed to the Capability and Enablement of Our People (CEP) workstream.

If a request relates to accessing information about a past student, CSBB provides a Request for Access to Information Application Form to support this process.

There will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the school's duty of care to the student. If the school is unable to provide access to that information, the school will provide the applicant with written notice explaining

the reasons for refusal (unless given the grounds for refusal, it would be unreasonable to provide reasons).

### **Correction to Personal Information**

To make a request to update any Personal Information CSBB holds about them or their child, individuals should contact the school's principal or delegate or CEP delegate in writing.

### **Enquiries and complaints**

For further information about the way CSBB manages the Personal Information it holds, or to make a complaint that CSBB has breached the Australian Privacy Principles, individuals should contact the school's principal (if the complaint relates to a school) or the Privacy Officer at CSBB (if the complaint relates to the CSBB central office).

### **Privacy Officer contacts details:**

Phone: (02) 9847 0000  
Email: CSBB@dbb.org.au  
Address: Privacy Officer  
Catholic Schools Broken Bay  
Caroline Chisolm Centre  
Building 2/423 Pennant Hills Road  
Pennant Hills NSW 2120

CSBB will investigate any complaint and will notify the complainant of a decision in relation to their complaint as soon as is practicable. The CSBB Complaints Handling Policy provides guidelines for the handling of complaints relating to the operation of CSBB, including complaints about management of Personal Information provided to or collected by CSBB.

Individuals may also make a direct complaint to the Office of the Australian Information Commissioner (**OAIC**).

### **How to lodge a privacy complaint with the OAIC**

The *Privacy Act 1988* external site requires that your complaint to the OAIC be made in writing. The OAIC can't take your complaint over the phone.

A privacy complaint can be submitted to the OAIC via the [online form](#).

### **Related Legislation**

- Privacy Act 1988 (Commonwealth)
- Australian Privacy Principles

## Review

The Policy will be reviewed by the relevant Workstream Lead and approved by the Director of Schools or, when required, the CSBB Board. The review will be undertaken every three (3) years unless there is a legislative or regulatory requirement to do so earlier.

## Version

Version	Current Title	Approval Date	Commencement Date
9	Privacy Policy	May 2026	May 2026
8	Privacy Policy	October 2023	October 2023
7	Privacy Policy	February 2020	February 2020
1	Privacy Policy	November 2021	November 2021

Approved by: Danny Casey – Director of Schools

Date of next review: May 2029