# Privacy Policy

## 1.0 PURPOSE

The policy aims to provide guidelines to protect the personal information the Youth2Industry College collects and holds.

We are bound by the Information Privacy Act 2000 (Vic), Privacy Act 1988 Cth), including the Privacy Amendment (Notifiable Data Breaches) Act 2017 and must comply with the Australian Privacy Principles (APPs). More information about the Privacy Act and the APPs can be found at the Office of the Australian Information Commissioner's website at www.oaic.gov.au.

The privacy laws do not replace any existing obligations Youth2Industry College has under other laws. Essentially this policy will apply when other laws do not regulate the use of personal information.

## 2.0 SCOPE

This policy applies to Youth2Industry College staff, students, parents/carers.

## 3.0 PRINCIPLES

**Personal information** means information or opinion that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can be reasonably determined from the information or opinion. For example, this includes all paper and electronic records, photographs and video recordings.

**Health information** is defined as including information or opinion about a person's physical, mental or psychological health, or disability, which is also classified as personal information. This includes information or opinion about a person's health status and medical history, whether recorded or not.

**Sensitive information** is defined as information relating to a person's racial or ethnic origin, political opinions, religion, trade union, or other professional, or trade association membership, sexual preferences, or criminal record that is also classified as personal information about an individual.

In this policy personal information refers to personal information, health information and sensitive information unless otherwise specified.

**Parent** in this policy in relation to a child, includes stepparent, an adoptive parent, a foster parent, guardian, or a person who has custody or daily care and control of the child.

**Staff** in this policy is defined as someone who carries out a duty on behalf of the Youth2Industry College, paid or unpaid, or who is contracted to, or directly employed by the Youth2Industry College. Information provided to the Youth2Industry College through job applications is also considered staff information.

## 4.0 IMPLEMENTATION

Personal information is collected and used by Youth2Industry College to:

- Provide services or to carry out the Youth2Industry College's statutory functions
- Assist the Youth2Industry College services and its staff to fulfil its duty of care to students
- Plan, resource, monitor and evaluate College services and functions
- Comply with VRQA and government department reporting requirements
- Comply with statutory and or other legal obligations in respect of staff
- Investigate incidents or defend any legal claims against the Youth2Industry College, its services, or its staff, and
- Comply with laws that impose specific obligations regarding the handling of personal information.

## 5.0 PERSONAL INFORMATION COLLECTION

In the process of the College providing products and services, the College collects personal information in a variety of ways. For example, when:

- An enquiry is made with or about the College, including as a current or prospective student, parent/carer
- A student is registered or when a student is to be registered on a waiting list
- Enrolling a student at the College
- Visiting our website
- Becoming a client or debtor of the College
- Supplying goods or services
- Entering into an agreement with us and
- Applying for or accepting a job, contract or voluntary role with us.

We hold information about:

- Students and parents/carers before, during and after the course of student's enrolment at the College
- Volunteers, contractors and service providers
- Job applicants and employees
- People who are nominated as emergency contract and
- Other people who come into contact with the College.

We may also collect and hold the following information for a current or prospective student:

- Name, address, email, contact details
- Age, date of birth and senior school program
- Victorian Student Number
- Copy or details from a birth certificate or passport
- Aboriginal or Torress Strait Islander identification
- Languages spoken at home
- Academic, social, learning and behavioral information
- Photographs
- Medical information including disabilities, medical conditions, dietary requirements and the name of any treating medical practitioners
- Family circumstances, including marital status of parents and other information in relation to custody or intervention orders.

We may also collect and hold current or prospective parent personal information, such as contact details and occupation.

Personal information is collected from students and parents directly through our website or from our enrolment form. In some cases, we may collect information from third parties such as medical and health practitioners, the Victorian Curriculum and Assessment Authority (VCAA), and the Victorian Tertiary Admissions Centre (VTAC).

When enrolling students, the College may collect personal information from the student's previous school to obtain information about the student's academic progress and any other details that may help the student's transition.

In some cases, the College may receive unsolicited personal information about a student (eg from a previous school). When unsolicited information is received, we will assess whether we are permitted by law to collect that information. If not, the information will be destroyed or de-identified.

We endeavor to keep all personal information highly secure.

## 6.0 USE AND DISCLOSURE

**Students and parents/carers**

The purposes for which the Youth2Industry College uses personal information of students and parents include:

- Keeping parents informed about matters related to their child's schooling
- Looking after students' educational, social and medical wellbeing needs

- Contacting members of the College community in the case of an emergency
- Celebrating the efforts and achievements of students
- Developing and improving our services
- Day-to-day administration
- Satisfying the Youth2Industry College's legal obligations, and
- Allowing the Youth2Industry College to discharge its duty of care.

**Staff**

The purposes for which the Youth2Industry College uses personal information of job applicants, staff members and contractors include:

- Assessing suitability for employment
- Administering the individual's employment or contract
- For insurance purposes, such as public liability or Workcover
- Satisfying the Youth2Industry College's legal requirements, and
- Investigating incidents or defending legal claims about the Youth2Industry College, its services, or staff.

We will only use personal information for the purposes for which it was given or for the purposes which are related to one or more of the functions or activities listed in this policy.

**The Youth2Industry College will use and disclose personal information about a student, parent and staff when:**

- Consent has been received
- It would be reasonably expected by us to use or disclose the personal information in this way
- We are authorized or required to do so by law
- Disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety
- Where another permitted general situation or permitted health situation exception applies
- Disclosure is reasonably necessary for law enforcement related activity.

Information collected through our website about visitors to that site may be used by the College for the purpose of gauging visitor traffic, trends and delivering personalized content while on our website.

Privacy legislation permits disclosure of personal information when it is made in good faith to DFFH Child Protection.

Subject to the requirements of the Child Information Sharing Scheme (CISS) and when certain threshold conditions are met the College will share confidential health and personal information with other Information Sharing Entities, including family services within a reasonable period of time. The conditions include:

- The purpose of sharing information is to promote the wellbeing and safety of a child
- The information may assist the organization to make a decision, assessment or plan, conduct an investigation, provide a service or manage any risk in relation to a child and
- The information is not 'excluded information' under the CISS.

Consent of parents/carers is not required in order to share personal or health information about a student with members of the school staff in order to support the education and social and emotional wellbeing and health of the student.

Relevant Youth2Industry College documentation should include a brief Privacy Notification of why the information is being collected and how the information will be used or alternatively direct the individual to the Privacy Policy on the Youth2Industry College website.

## 7.0 ADDITIONAL INFORMATION FOR STAFF MEMBERS, CONTRACTORS AND VOLUNTEERS

We aim to collect personal information only if it is reasonably necessary to work performance and we acknowledge individual rights to keep certain information private. In general employees can assume that we collect and hold the following personal information:

- Name
- Address
- Email
- Telephone number
- CV and qualifications
- Employment contract
- Details of banking, taxation and superannuation
- Details of performance, conduct relating to work and capacity to perform duties.

The College has rights and obligations to collect information about the capacity to perform duties. During the course of a job application, we may collect information from prior employees. During the course of employment, information may be collected by monitoring work practices. Monitoring will always occur fairly, respectfully and lawfully. Information collected in this manner will be used for legitimate purposes only.

## 8.0 MAINTAINING THE PRIVACY OF OTHERS

Personal information about students, their parents and members of staff should never be shared inappropriately. In all communications, including via electronic and social media, conduct must ensure it does not break privacy expectations and is not offensive, derogatory or damaging to the school or individuals. This includes statements shared on social media outside the workplace and or personal devices as well as at work.

## 9.0 CONSENT

Where consent for the use and disclosure of personal information is required, the Youth2Industry College will seek consent from the appropriate person. In the case of a student's personal information, the Youth2Industry College will seek the consent from the student and/or parent, depending on the circumstances and the student's mental ability and maturity to understand the consequences of the proposed use and disclosure.

## 10.0 ACCESSING AND CORRECTING PERSONAL INFORMATION

A parent, student or staff member may seek access to their personal information, provided by them, that is held by the Youth2Industry College. This request will have to be made in writing for security reasons.

Access to other information may be restricted according to the requirements of laws that cover the management of College records. These include the Public Records Act and the Freedom of Information Act.

## 11.0 MAINTAINING THE QUALITY OF PERSONAL INFORMATION

The Youth2Industry College aims to keep personal information it holds, accurate, complete and up-to-date. A person may update or review their personal information by contacting the Principal.

## 12.0 SECURITY

We are committed to maintaining the security and confidentiality of personal information and aim to take all reasonable precautions to protect personal information from unauthorized access, disclosure, use, alteration or loss.

Confidentiality is regularly discussed with staff and access to personal information is only shared on a "need to know" basis. In addition, we have the following security measures in place to protect personal information.

- All data systems are protected by a combination of ICT security measures including permission-based password protected access to information and appropriate firewall and other intrusion protection systems
- Our offices and filing cabinets are securely locked

- Our office is monitored regularly by a security service
- Our website and servers are protected by a firewall and
- Our employees agree to the statement on confidentiality when they begin employment at the College.

## 13.0 COMPLAINTS

Should the Youth2Industry College receive a complaint about personal information privacy this will be investigated in accordance with the Youth2Industry College's **QMS:437 Grievance Policy (Community), QMS:438 Grievance Policy (Staff) or QMS:439 Grievance Policy (Student).**

You can also make a complaint to the Office of the Australian Information Commissioner (or any statutory successor). Further information is available at www.oaic.gov.au.

## 14.0 ASSOCIATED DOCUMENTS

- QMS:418 Y2IC Digital Technologies Policy and Procedures
- QMS:437 Y2IC Grievance Policy (Community)
- QMS:438 Y2IC Grievance Policy (Staff)
- QMS:439 Y2IC Grievance Policy (Student)

## VERSION CONTROL DETAILS

### Revision History

| Date | Version | Author | Change Reference |
|---|---|---|---|
| 25/5/2020 | 1 | P Vakakis | Initial Policy |
| 30/11/2023 | 2 | P Vakakis | Reviewed and updated |
| 10/04/2025 | 3 | T. Witenden | Update names of policy references |

### Reviewers

| Date | Version | Approved By | Next Review Date |
|---|---|---|---|
| 25/5/2020 | 1 | Y2IC Board | March 2023 |
| 5/12/2023 | 2 | Y2IC Board | December 2026 |
| 10/04/2025 | 3 | T. Witenden | December 2026 |