

 <p>CREST EDUCATION POLICY</p>	TITLE	CREST PRIVACY POLICY		
	VERSION	01/2026		
	LOCATION	STAFF/STUDENTS/VOLUNTEERS		
	ISSUE DATE	APRIL 2026		
	REVIEW DATE	APRIL 2028		
	REVIEWED BY	Head of Advancement	RATIFIED BY	EXECUTIVE PRINCIPAL
PURPOSE	To provide policy and procedure direction to all staff, students, parents and volunteers of the CREST Educational Precinct.			
BACKGROUND	CREST Education seeks to establish and maintain high level professional standards in relation to all activities within the Educational Precinct. This policy is in accord with the Crest Education 'Vision', 'Mission', 'Philosophy' and 'Key Commitments' documents as published and in line with CREST Board Policy.			
RELATED DOCUMENTS	CREST Child Safety and Recordkeeping Policy Privacy Act 1988 (Cth) Privacy and Data Protection Act 2014 (Vic) Health Records Act 2001 (Vic) Australian Privacy Principals (APPs) The Victorian Registration & Qualification Authority Guidelines to the Minimum Standards and Requirement for School Registration Education and Training Reform Act 2006 (Vic) Education and Training Reform Regulations 2017 (Vic) Child Wellbeing and Safety Act 2005 (Vic) Children, Youth and Families Act 2005 (Vic) Crimes Act 1958 (Vic)			

Rationale

CREST Education Ltd is a non-denominational Christian educational precinct operated in accordance with its Vision, Mission and Philosophy statements attesting to foundational beliefs which underpin its Christian basis of operation.

This policy provides guidelines for enrolment into CREST Education in line with governing state and Commonwealth legislation. Where 'CREST', 'School' or 'College' is mentioned, the application is to Hillcrest and Rivercrest Christian Colleges.

CREST Education is committed to protecting the privacy of personal and sensitive information. This Policy explains how CREST Education collects, stores, uses, and discloses personal and sensitive information in accordance with applicable privacy laws and the Australian Privacy Principles. It ensures that all information is handled with care, integrity, and transparency.

Scope

This Policy applies to all members of the CREST Education community, including students, parents, staff, contractors, volunteers, alumni, and visitors. It governs the collection, management, use, and disclosure of personal and sensitive information for educational, administrative, employment, and community engagement purposes.

The Australian Privacy Principles and this policy do not apply to the school's treatment of employee records where the treatment is directly related to a current or former employment relationship between the school and the employee.

Definitions

- Still images mean Photographs captured using a camera, phone, tablet, or other device.
- Moving images means Videos recorded using a camera, phone, tablet, or other device.
- Digital images mean Images published on CREST Education’s official digital platforms (e.g., website, social media, newsletters).
- Printed images mean Images used in physical publications (e.g., yearbooks, brochures,).

Collecting Personal Information

1. CREST Education collects, holds, and uses personal information to support its educational, operational, and governance functions. These functions include delivering academic programs and activities, managing enrolments, attendance, and academic progress, communicating with parents, students, alumni, and the wider school community, ensuring the health, safety, and wellbeing of students and staff, managing employment and contractor arrangements, and complying with legal and regulatory obligations.
2. CREST Education collects personal information directly from individuals through enrolment forms, online portals, emails, or telephone communication. Information may also be obtained from third parties such as referees, previous schools, health professionals, or educational agents.
3. CREST Education endeavours to collect only the information necessary for its functions and does so in a fair and lawful manner.

Currency, Storage and Security of Personal Information

4. CREST Education ensures that all personal information is accurate, complete, and up to date. Parents and staff can update their details through secure online systems such as Consent2Go, CREST Connect and Synergetic.
5. Personal information is securely stored on CREST Education’s servers located in Australia, as well as on authorised cloud platforms that use Australian data hosting. Physical records are stored in secure facilities with restricted access.
6. The School applies a range of safeguards to prevent data breaches, including controlled user access, encryption, strong password protocols, and secure document destruction processes.
7. CREST Education adheres to data retention schedules that comply with legal and child safety record-keeping requirements.

Collecting Sensitive and Health Information

8. CREST Education collects sensitive and health information only where it is reasonably necessary for school operations.
9. This may include student enrolment details, information relating to health, wellbeing, and learning support, or compliance requirements under the Education and Training Reform Act 2006 (Vic), VRQA Standards, and NCCD reporting.
10. Sensitive information may also be collected during staff recruitment processes or as part of child safety compliance measures, including Working with Children Checks and Police Checks.

11. Health information is collected in relation to immunisations, allergies, medical management, and reasonable adjustments.
12. Consent is sought from individuals or parents and guardians before collecting sensitive information, unless the collection is required or authorised by law.

Website, Analytics and Anonymity

13. CREST Education's public websites, (www.hillcrest.vic.edu.au; www.rivercrest.vic.edu.au; www.cresteducation.vic.edu.au) , may collect limited personal information when users submit enquiry forms, register for events, or subscribe to communications.
14. Web analytics tools, such as Google Analytics, may gather anonymised data for the purpose of improving the website's functionality and user experience.
15. Where lawful and practicable, individuals may interact with CREST Education anonymously. However, anonymity is generally not possible when the School must verify an individual's identity for purposes such as enrolment, employment, or compliance with child safety obligations.

Social Media and Marketing

16. CREST Education uses social media and digital platforms to communicate, celebrate achievements, and promote the values and programs of the School.
17. All identifiable images used for marketing, communication, or promotional purposes must be approved by the relevant staff member or the parent or guardian of the student concerned. Consent is obtained through the enrolment or employment process.

Student Privacy and Publishing Consent

18. To protect student privacy, CREST Education:
 - a) Seeks annual parental consent for image use upon enrolment and at the start of each year.
 - b) Allows parents to withdraw or modify consent at any time.
 - c) Ensures images are used in accordance with consent levels and in line with School requirements.
 - d) Uses secure digital storage and facial recognition software to manage publishing permissions.
 - e) Does not tag students on social media.
19. CREST Education has three (3) categories of consent:
 - a) Online Material (Synergetic Label: Web)
Images related to learning moments will be uploaded to internal systems accessible solely to CREST Education staff and families. Platforms such as CREST Connect, Seesaw, and ManageBac require login credentials, ensuring content remains secure. Student names will be included.

b) Promotional Material

Images may be used for promotional activities through materials such as flyers, annual reports, bus wraps, billboards, yearbooks, prospectuses, advertisements, official websites, social media platforms, YouTube, Seek.com.au, and others. Student names may also be included. The Marketing/Advancement team will contact families directly for additional permission before using images in major public-facing initiatives (e.g., bus wraps or billboards).

c) Print Material (Synergetic Label: School Publications)

Images captured during school activities may be used in school publications such as diaries, signage, banners, brochures, and other printed materials within the College. Student names may also be included.

20. Each year, CREST Education requires school photographs for essential operational purposes, including but not limited to student identification, child safety, medical emergencies, and other internal administrative needs.

21. As part of this process, a professional photographer is engaged to take:

- a) Class and individual photos
- b) Student ID photos
- c) Images stored on the school's administrative system

22. Parents will be notified prior to photo day and may opt out of any non-essential uses. However, images required for critical operational functions, such as emergency identification, child safety, and medical needs, will be retained securely by the School.

Use of Student Photographs & Moving Images

23. Internal Use & School Communications

CREST Education may photograph, film, or record students for internal use, including:

- a) Classroom learning materials
- b) Student projects and academic assessments
- c) Displays in school buildings and offices

24. External Use Images may also be used publicly, including:

- a) CREST Education websites
- b) School communications
- c) School social media accounts
- d) School magazine, brochures, and promotional materials
- e) In partnership with Christian Schools Australia, Independent Schools Victoria and CITE Alliance.

Media Involvement

25. The media may seek to photograph, film, or record students for news stories or school events. CREST Education will:

- a) Inform parents of media requests
- b) Seek parental consent before allowing students to be filmed or photographed by external media
- c) Ensure media personnel follow school guidelines on image use

Use of Staff Still & Moving Images

26. Staff consent is obtained for internal and external use of images.
27. Staff may update or withdraw consent at any time.

Parental/Guardian use of Student Still & Moving Images

28. To protect student and staff privacy, parents, guardians and visitors are prohibited from photographing or filming students and/or staff on any part of the CREST Education precinct.
29. Parents and guardians may photograph or film their own child at school events, provided that:
 - a) Images are for personal use only.
 - b) Other students' privacy is respected (no sharing on social media without consent)
 - c) No photos/videos are taken in change rooms or toilets.

Use of Student Images by Third Parties

30. Third-party organisations (e.g., educational partners, competition organisers, external program providers) must:
 - a) Obtain permission from CREST Education before using student images
 - b) Have clear agreements in place for image use
 - c) Specify the purpose, duration, and storage of images
31. CREST Education will seek parental consent on behalf of third parties before approving external use of images.
32. Any proposed use of an image or recording for advertising, commercial, or third-party purposes requires separate written consent before publication. This includes partnerships, sponsorships, and media-related activities.
33. CREST Education does not permit the unauthorised sharing of School images on personal social media accounts or public platforms. Staff, students, and community members are expected to comply with the School's relevant Codes of Conduct and Digital Learning and Wellbeing Policies when using or sharing images related to the School.
34. All media, marketing, and digital communications activities must ensure the dignity, privacy, and safety of students and staff, in alignment with CREST Education's Child Safety and Wellbeing Policy.

Disclosure of Personal Information

35. CREST Education discloses personal information only when required or authorised by law, when necessary to fulfil its duty of care, or to protect the safety and wellbeing of students and staff.
36. The School may also disclose personal information to government agencies such as the VRQA, the Victorian Institute of Teaching, or the Department of Education, and to comply with mandatory reporting obligations under the Crimes Act 1958 (Vic) and the Reportable Conduct Scheme.
37. Information may also be disclosed for enrolment transfers, excursions, international programs, or compliance audits.
38. CREST Education engages trusted third-party service providers to support its operations, including software and database management, contractor compliance, and payment processing. All providers are bound by contractual privacy and data protection obligations.

Disclosure of Information Overseas

39. CREST Education primarily stores data within Australia. However, information may be disclosed overseas, when necessary, for example when organising international school trips, managing enrolments, or using secure third-party cloud platforms.
40. CREST Education takes all reasonable steps to ensure that any overseas recipients comply with the Australian Privacy Principles and uphold equivalent standards of data protection.

Access and Correction of Personal Information

41. Individuals have the right to request access to, and correction of, their personal information held by CREST Education.
42. All requests for access will be managed in accordance with the Records Management Policy, which sets out the procedures, authorisation processes, and retention requirements for records containing personal or sensitive information.
43. Requests must be submitted in writing to the Head of Advancement. Proof of identity may be required before access is granted.
44. The Executive Principal, or their delegate, will oversee all record access requests to ensure they are handled in accordance with the School's obligations under the Privacy Act 1988 (Cth), the Health Records Act 2001 (Vic), and the Education and Training Reform Act 2006 (Vic).
45. Access to records will only be provided to the extent permitted by law, and in a manner that upholds confidentiality, protects third-party information, and maintains the integrity of School records.
46. Requests for academic, attendance, or wellbeing information will be processed within the timeframes and administrative procedures defined in the Child Safety and Wellbeing Recordkeeping Policy and Child Information Sharing Scheme.
47. CREST Education will respond to all access or correction requests within thirty days of receipt. If access is denied, the individual will receive written reasons for the decision and details of review rights.

Privacy Impact Assessments

48. CREST Education undertakes Impact Assessments when implementing new projects or technologies that may affect the handling of personal information.
49. These assessments identify and evaluate privacy risks and outline strategies to ensure ongoing compliance with relevant legislation and privacy obligations.

Notifiable Data Breaches

50. CREST Education complies with the Notifiable Data Breaches Scheme under the Privacy Act 1988 (Cth).
51. A notifiable data breach occurs when there is unauthorised access to, or disclosure of, personal information that is likely to result in serious harm to an individual, and where the School cannot reasonably prevent that harm.
52. In the event of a data breach, the relevant ICT and Administrative teams, will contain the incident, assess the impact, notify affected individuals and the Office of the Australian Information Commissioner if required, and implement measures to prevent recurrence.

Privacy Complaints

53. CREST Education takes all privacy concerns and complaints seriously. Individuals who wish to raise a concern regarding the management of personal information should contact the Head of Advancement.
54. All complaints will be handled confidentially and in accordance with the School's Complaints and Grievances Policy.
55. Complaints can be addressed to: Head of Advancement: Privacy, 700 Bells Road, Clyde North, Victoria 3978.
Email: registrar@cresteducation.vic.edu.au Phone: (03) 9702 2144
56. If a complaint is not resolved to the individual's satisfaction, the matter may be referred to the Office of the Australian Information Commissioner or the Victorian Health Complaints Commissioner.

DIRECTION

That all staff, students and volunteers follow this policy.

EXECUTIVE PRINCIPAL
CREST Education

Date of Revision	Issue Number	Revision Detail	Authorised By
April 2026	1	New Policy	Executive Principal