



## Policy Statement

The Diocese of Ballarat Catholic Education Limited (DOBCEL) is committed to open, transparent, and effective communication with all stakeholders.

DOBCEL and DOBCEL schools will communicate information promptly to students, staff, parents, and the community:

- by following regulatory requirements
- to protect the rights of individuals
- to uphold our duty of care to students and
- to provide necessary information to make appropriate decisions.

DOBCEL is committed to using communication processes and techniques to build positive learning environments for students, staff, and parents/carers, inspiring and educating all students to become productive and valued citizens.

## Context

The Communication Policy is a crucial tool that assists all members of the DOBCEL community in planning and managing their communications. It is designed to build stronger, transparent relationships and networks across DOBCEL school communities, emphasising the importance of each individual's role in this process.

This policy provides clear advice for schools to implement communications processes to meet compliance requirements aligned with the *Victorian Registration & Qualifications Authority (VRQA)* and *Child Safe Standards*. The DOBCEL Board, as the governing body, requires schools to publish procedures that outline how their school community can access school policies and procedures.

The DOBCEL Board requires schools to implement communication strategies and tools to:

- provide accessible and inclusive communication practices that consider the communication needs of diverse groups within the school community
- establish consistent expectations for communication with the school community
- promote a culture of honesty, trust, transparency, openness, and respectful communication
- manage confidential information in a manner that is consistent with legal obligations, professional standards, and community expectations
- provide the school and broader community with information regarding events, achievements, and activities at the school
- meet regulatory requirements to ensure policies and procedures are publicly available.

## Scope

The Communication Policy applies to all official communications between DOBCEL staff, schools, students, parents, caregivers, communities, and stakeholders.

# Principles

## Ethical Considerations

This policy is in place to ensure that all communication is ethical and respects the rights and dignity of all individuals.

DOBCEL and DOBCEL schools will prioritise the students and communities they serve and ensure that communication is of the highest ethical standard. DOBCEL and DOBCEL school staff will discuss and evaluate the risks of sharing images or information before publishing. DOBCEL and DOBCEL schools will ensure that the use in any communication of images and messages portraying students and school community members respects the dignity, values, history, religion, and culture of the people portrayed.

If there is a concern that publishing information may impact an individual or group, the Principal or Executive Director of Catholic Education Ballarat will be invited to assess the matter further to ensure risks are mitigated before proceeding.

## Child Safe Communication

DOBCEL and DOBCEL school staff must ensure that all communication adheres to the *Child Safe Standards*, as outlined in *Ministerial Order 1359*, to which all staff members are signatories. This includes protecting children's identities and ensuring they will not be placed at risk by revealing their names, personal information, locations, and images. This policy is in place to prioritise the safety and well-being of students.

## Right to Disconnect

The *Fair Work Act* includes a provision for employees to disconnect from work and not respond to their employer after or outside work hours. Specifically, employees have two rights:

- to refuse to monitor, read, or respond to contact from an employer outside of the employee's working hours unless the refusal is unreasonable
- to refuse to monitor, read, or respond to contact from a third party if the contact relates to their work and is outside the employee's working hours unless the refusal is unreasonable.

Modern awards laws now include a 'right to disconnect' term and a free-standing right to disconnect.

The Fair Work Commission has the authority to issue stop orders for continuous unwarranted contact.

When determining whether contact outside working hours is reasonable, the legislation outlines factors to consider. These include:

- the nature and urgency of the reason for contact
- the method of contact (e.g. a phone call would likely be considered more disruptive than an email)
- whether the employee is compensated for working outside of their ordinary hours
- the level of the employee's responsibility within the organisation
- the employee's individual circumstances.

For more information, refer to the [VCEA – Right to Disconnect: Fair Work Act Amendments Information Sheet](#).

## Use of Communication Tools

For further information on communications within schools, refer to the School Communications Procedures.

## DOBCEL Websites

The DOBCEL website provides public information on DOBCEL, its operations and the schools it governs.

## School Websites

School websites are valuable sources of information for parents, students, and staff. They are generally the first place people will look for information about a school. School websites communicate essential information such as key term dates, school events, and announcements. The school website is also a key reference point for school documents such as policies, annual reports, and handbooks.

- DOBCEL and DOBCEL schools must ensure their websites conform to all accessibility guidelines and comply with the *Disability Discrimination Act 1992* (Cth). This means that:
  - where linked documents are used (for example, a registration form that must be printed), a PDF document must also be available in a more accessible version such as *Word*
  - videos have transcripts
  - images have descriptions called 'alt text' so the screen reader software captures them
  - content must be easy to read and accessible
- school staff must thoroughly check the content, files, attachments, and links on the school website to avoid mistakenly publishing personal or sensitive information. If such information is published by mistake, it must be removed immediately, and the Executive Director as well as the school's assigned Education Consultant must be notified via [execdirector@dobcel.catholic.edu.au](mailto:execdirector@dobcel.catholic.edu.au).
- schools must publish policies in the Policy Publications section of the school websites
- schools must ensure that their website is regularly updated to remain relevant

## Newsletters

When developing a newsletter, DOBCEL staff and DOBCEL schools must comply with copyright rules. For example, they must either own the image or have permission from the photographer to use any images in their newsletter.

When publishing newsletters, DOBCEL and schools must undertake the following actions to ensure they maintain the privacy of students and their families:

- always have parental consent before publishing student photos in the newsletter. Refer to the *Photograph & Recording Permission Form*
- the home addresses or personal phone numbers of staff, students or parents must not be published
- the school newsletter should include students' first names only.

## Legislative Context

[\*Charter of Human Rights and Responsibilities Act 2006\*](#)

[\*Child Safe Standards for Education Providers\*](#)

[\*Disability Discrimination Act 1992 \(Cth\)\*](#)

[\*Equal Opportunity Act 2010 \(Vic\)\*](#)

[\*Education and Training Reform Act 2006 \(Vic\)\*](#)

[\*Privacy and Data Protection Act 2014 \(Vic\)\*](#)

[\*VRQA Minimum Standards and Requirements for School Registration\*](#)

## Definitions

TERM	DEFINITION
Copyright	<p>Provides legal protection for people who express original ideas and information in certain forms. The most common forms are writing, visual images, music and moving images. Copyright does not protect ideas or information, only the original expression of ideas or information.</p> <p>The <i>Copyright Act Australia 2015</i> enable rights holders to apply for a court order requiring carriage service providers to block access to a website, operated outside of Australia that has the primary purpose of infringing copyright or facilitating the infringement of copyright.</p>
Personal information	<p>Is recorded information or opinion, whether true or not, about a person whose identity is apparent, or can reasonably be ascertained, from the information. The information or opinion can be recorded in any form. A person's name, address, phone number and date of birth (age) are all examples of personal information.</p>
Sensitive information	<p>Is a type of personal information with stronger legal protections due to the risk of discrimination. It includes information or opinion about an identifiable person's racial or ethnic origin, political opinions or affiliations, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices, criminal record, or membership of a trade union.</p> <p>Personal and sensitive information is regulated in Victoria under the <i>Privacy and Data Protection Act 2014 (Vic)</i>.</p>

## Roles and Responsibilities

Role	Responsibility
DOBCEL Board	<p>The DOBCEL Board, through its management arm is responsible for:</p> <ul style="list-style-type: none"> <li>• monitoring and improving as necessary its processes for what, to whom, how and when information is disseminated and how consultation and other dialogue is undertaken</li> <li>• ensuring that the principle of two-way communication which allows engagement, feedback, and sharing of opinions is established</li> <li>• ensuring that communications within and between DOBCEL, schools, and stakeholders respect confidentiality and privacy</li> <li>• providing guidance on communications that ensures that DOBCEL staff, school staff, the school community, and the general community are: <ul style="list-style-type: none"> <li>- communicated with in a clear, respectful, accurate, coordinated, and timely manner</li> <li>- well-informed and understand DOBCEL's role in supporting schools and the community.</li> </ul> </li> </ul>

Through Management, DOBCEL Board will ensure that DOBCEL staff and school staff:

- are thoroughly and accurately informed in a timely way of all relevant activities, policies, issues, and plans to enable them to be as effective as possible in their role
- are aware of their responsibility to develop and maintain good communication practices within the school community.

#### School staff

School staff will ensure:

- communication with colleagues is professional and supportive
- acknowledgement of or response to communication is within three (3) business days during school terms
- there is no engagement with students, parents, or caregivers on any personal online platforms or social media
- contact with students is consistent, transparent, and fair to all students at the school
- where relevant, all school documents and forms are discussed with students so that students are aware of the content and expectations.

## Supporting Documentation

The forms, templates, and internal documents listed below can be downloaded from Knowledge Banks: eSORT Folder for Schools and Policy Central in SharePoint for the Catholic Education Ballarat.

### Forms and Templates

- Photography and Recording Permission Form

### Resources

- Child Safe Risk Management Policy [DOBCEL]
- Diversity and Equity Policy [School]
- Policy Publication on School Websites [DOBCEL]
- Privacy Policy [DOBCEL]
- School Communications Procedure [School]

## DOBCEL Principles of Governance

All DOBCEL policies are founded on and reflect the Principles of Governance stated in the Document:

[DOBCEL Principles of Governance](#)

Responsible Directorate member	Executive Director: Catholic Education Ballarat
Policy Owner	Manager: Assurance & Risk
Assigned Board Committee	Governance
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