Student Data Privacy Policy

Handling Student Data From Vehicle Tracking and Tap-On Tap-Off Systems Under the Privacy Act 1988

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Where a service uses vehicle tracking or a tap-on tap-off system, it can generate information about a child: when and where they boarded, when they were set down, and where the bus was at a given time. That is personal information, and when it concerns a child it deserves particular care. Sydney Charter Bus Australia handles this data in line with the Privacy Act 1988 (Cth) and the Australian Privacy Principles, and with the extra caution that student data warrants.

This document explains, in plain terms, what data these systems may collect, why, how we protect it, who we may share it with, and the rights of families and schools. It complements our general privacy commitments and applies specifically to student transport where tracking or attendance technology is used.

Privacy Act 1988 Compliant | Collected for Safety Only | Extra Care for Children's Data

Our Commitment

We collect student data only where it serves a genuine safety or service purpose, we hold only what we need, we protect it, and we do not use it for anything it was not collected for. Children's personal information is treated with particular care. We handle all personal information in accordance with the Privacy Act 1988 (Cth), which is overseen by the Office of the Australian Information Commissioner, and we keep our practices current as privacy law continues to strengthen.

The Legal Framework

Privacy in Australia is governed by a clear national framework, recently strengthened by significant reforms. We align our handling of student data to all of it.

Framework	What It Covers
Privacy Act 1988 (Cth)	The principal law governing how personal information is collected, used, stored and disclosed in Australia.
The 13 Australian Privacy Principles (APPs)	The core standards, in Schedule 1 of the Act, covering the full life of personal information from collection to correction.
Notifiable Data Breaches scheme	Requires notification to the regulator and affected individuals where a data breach is likely to result in serious harm.
Privacy and Other Legislation Amendment Act 2024 (Cth)	Major 2024 reforms, including a statutory tort for serious invasions of privacy and a framework for a Children's Online Privacy Code.
Office of the Australian Information Commissioner (OAIC)	The independent regulator that administers the Privacy Act and the Australian Privacy Principles.

This is a plain-language summary for information only and is not legal advice. The Australian Privacy Principles are published by the Office of the Australian Information Commissioner (oaic.gov.au). Some schools are also bound by NSW public-sector privacy law, and we work with each school within its own framework.

What Data These Systems May Collect

Depending on the service and the technology in use, tracking and tap-on tap-off systems may collect the following. We collect only what is reasonably necessary for the service, in line with Australian Privacy Principle 3.

Boarding and set-down records	Where a tap-on tap-off or attendance system is used, a record that a particular student boarded or was set down, and at what time and stop.
Vehicle location	GPS location of the vehicle during a service, which supports safety, timing and coordination with the school.
Student identifier	A name or a card, tag or system identifier that links a boarding record to a particular student, as arranged with the school.
Service and route details	The route, run and driver associated with a service, for operational and safety records.

We do not collect more than the service requires, and we do not use these systems to track children beyond the delivery of the transport service.

Why We Collect It

Student tracking and attendance data exists to keep children safe and services accountable, nothing more. We use it only for the purposes it was collected for, consistent with Australian Privacy Principle 6.

Knowing every child is accounted for	A boarding and set-down record helps confirm that each child who should be on a service is on it, and is set down where they should be.
Safety and peace of mind	Location and attendance information supports a rapid, accurate response if a question or concern arises about a service.
Service coordination	Timing and location data helps us and the school coordinate pickups, set-downs and any changes on the day.
Accountability and records	Accurate service records support our safety obligations and give the school confidence in the service.

How We Align to the Australian Privacy Principles

The thirteen Australian Privacy Principles are the benchmark for handling personal information in Australia. Here is how they shape our handling of student data.

Principle	In practice
APP 1 – Open and transparent management	We publish this policy so families and schools know how student data is handled.
APP 3 & 5 – Collection and notification	We collect only what is reasonably necessary and are open about what is collected and why.
APP 6 – Use and disclosure	We use student data only for the transport, safety and accountability purposes it was collected for.
APP 7 – Direct marketing	We never use student data for marketing.
APP 8 – Cross-border disclosure	Where any provider stores data, we take reasonable steps to ensure it is handled to Australian Privacy Principle standards.
APP 10 – Quality	We take reasonable steps to keep student records accurate and up to date.
APP 11 – Security	We take reasonable steps to protect student data from misuse, loss and unauthorised access, and to destroy or de-identify it when no longer needed.
APP 12 & 13 – Access and correction	Families and schools can request access to a student's data and ask us to correct it.

The full set of thirteen principles is published by the Office of the Australian Information Commissioner (oaic.gov.au).

Who We Share It With

Student data is not for sale and is not shared casually. We disclose it only in limited, appropriate circumstances.

The school or care organisation	The school that arranges the service, so it can carry out its own duty of care to its students.
Our technology provider	Where a tracking or attendance system is operated by a provider, that provider processes the data on our behalf under appropriate obligations.
Authorities, where required	Where we are required or permitted by law, for example in a safety, incident or child protection matter.
Not for marketing, ever	We do not sell student data or share it for marketing or any unrelated purpose.

How We Protect It, and What Happens in a Breach

Security is central to handling children's data. We take reasonable steps to protect student data, and we have a clear obligation if something goes wrong.

Access controls	Access to student data is limited to those who need it for the service.
Held only as long as needed	We retain student data only for as long as it is needed for the service and our record-keeping obligations, then securely destroy or de-identify it.
Notifiable Data Breaches scheme	If a data breach is likely to result in serious harm, we will notify the affected individuals and the Office of the Australian Information Commissioner as the scheme requires.
We work with the school	In any privacy incident involving student data, we coordinate with the school so families are informed and supported.

Your Rights: Access, Correction and Concerns

Families and schools have real rights over student data, and we make them easy to use. You can ask what data we hold about a student, ask us to correct it if it is wrong, and raise a privacy concern with us at any time. Contact us and we will respond in a reasonable timeframe. If you are not satisfied with how we handle a privacy concern, you have the right to raise it with the Office of the Australian Information Commissioner. We would always prefer the chance to put things right first, and we take every privacy concern seriously.