

Northside Christian College

POLICY

Privacy

Issued by:	Principal's Office
Issue Date:	1 November 2019
Approved by:	College Board
Location:	College website, Policy database, Policy register and Parent Lounge
Review Date:	November 2021

Introduction

Northside Christian College (the 'College') is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This Privacy Policy sets out how the College manages personal information provided to or collected by it.

The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing College environment.

Purpose

The Privacy Policy of the College describes how the College uses and manages personal information provided to or collected by it. This includes satisfying both the needs of parents and/or guardians, and the needs of the student throughout the whole period the student is enrolled in the College.

Scope

The Policy applies to Board and Council members, employers, employees, volunteers, contractors, parents/guardians and students, and people visiting the College; and describes the type of information the College collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

Exemption

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to the College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee.

Responsibility

The Principal

Point of contact

The Principal's Office

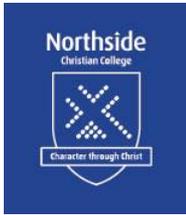
Relevant Legislation and References

- Privacy Act 1988 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012
- Child Protection Policy

Collection of Information

The type of information the College collects and holds includes (but is not limited to) personal information, including health and other sensitive information, regarding:

- students and Parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the College;
- job applicants, staff members, volunteers and contractors; and
- any other people who come into contact with the College.



Personal information means information or an opinion about an identified or reasonably identifiable individual, whether or not the information or opinion is true or not, or in recorded form or not.

You may wish for personal information and sensitive information to be kept anonymously or under a pseudonym. Where it is practicable or lawful for us to, we will do so. It is normally not practicable to do so. However, if you would like to discuss information being made anonymous or under a pseudonym, please contact the Principal's Office in writing.

Types of Information Collected

The College will generally collect personal information held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions, people other than Parents and students provide personal information.

In some circumstances, the College 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 College.

The College will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

1. Students and Parents

In relation to personal information of students and Parents, the College's primary purpose of collection is to enable the College to provide schooling for the student. This includes satisfying the needs of Parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

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

- to keep Parents informed about matters related to their child's schooling including, through correspondence, newsletters and magazines, websites, intranet sites and College Networking and Social Media sites;
- day-to-day administration of the College;
- looking after students' educational, social, spiritual and medical wellbeing;
- seeking donations and marketing for the College; and
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

In some cases where the College requests personal information about a student or Parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

2. Job applicants, staff members and contractors

In relation to personal information of job applicants, staff members and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

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

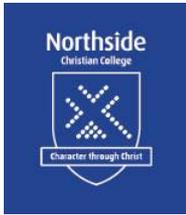
- to undertake referee checks and to confirm information provided in job applications;
- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the College; and
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

3. Volunteers

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as alumni associations, to enable the College and the volunteers to work together.

4. Marketing and fundraising

The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the College's Foundation or alumni organisation [or, on occasions, external fundraising organisations].



Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

5. **Photography, Video & Audio Recordings**

The College, Parents, volunteers and students acknowledge that photographs in particular play an important role in the life of College, including for the preservation of College history. Photographs and video/audio recordings of students, staff, Parents and volunteers may be taken during normal College activities, annual College/class/individual photographs, for student identification cards and during curricular, co-curricular and sporting activities, and also for other promotional purposes. Parents, students, staff members and volunteers consent to the use and/or disclosure of photographs, video/audio by the College including for the purpose of keeping Parents and other people within the College community information about matters relating to the student or the College and for the purpose of promotions, marketing and fundraising. Individuals are free to discuss with the College Principal the use of their image in such material.

6. **Security Surveillance Footage**

The collection of surveillance footage by way of video surveillance is carried out to the extent that is reasonably necessary to enable the College to discharge its duty of care to its students, parents and employees, and to protect College property.

Disclosure of Personal Information

The School may disclose personal information, including sensitive information, held about an individual to:

- another school or staff at another school
- government departments
- medical practitioners
- people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools
- assessment and educational authorities, including, but not only the Australian Curriculum, Assessment and Reporting Authority
- people providing administrative and financial services to the School;
- recipients of School publications, such as newsletters and magazines and College social media sources
- pupils' parents or guardians
- anyone you authorise the School to disclose information to
- anyone to whom we are required to disclose the information to by law.

Sending information overseas

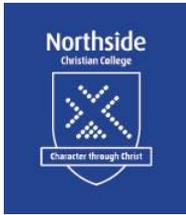
The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia, or to facilitate a College exchange or overseas trip.

However, the College 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.

The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of 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 that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. School personnel and the AIS and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.



Sensitive Information

In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and Security of Personal Information

The College's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals. The College has steps in place to protect personal information the College 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 computerised records.

Access and Correction of Personal Information

The College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date.

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves. There are some exceptions to these rights set out in the applicable legislation.

Parents may make a request to access or update any personal information the College holds about themselves or their child by contacting the Principal's Office in writing. The College may require verification of identity and specification of what information is required. The College may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance. If access to that information cannot be provided, the College will provide a written notice explaining the reasons for refusal.

Consent and Rights of Access to the Personal Information of Students

The College respects every Parent's right to make decisions concerning their child's education. Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. The College will treat consent given by Parents as consent given on behalf of the student, and notice to Parents will act as notice given to the student.

As mentioned above, Parents may seek access to personal information held by the College about them or their child by contacting the Principal's Office in writing. However, 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 College's duty of care to the student.

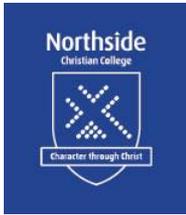
The College may, at its discretion, on the request of a student grant that student access to information held by the College about them, or allow a student to give or withhold consent to the use of their personal information, independently of their Parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

There may be other circumstances where the College may deny access to certain personal information where that denial is required by law (for example, for complying with the *Child Protection Act 1999* (Qld)).

Enquiries and Complaints

If you would like further information about the way the College manages the personal information it holds, or wish to complain that you believe that the College has breached the Australian Privacy Principles, please contact the Principal's Office in writing. The College will investigate any complaint and will notify you of the making of a decision in relation to your complaint within 30 days of receiving the complaint.

Should you be dissatisfied with the College's response, or not receive a response by the end of the 30 day period, you may make a complaint to the Office of the Australian Information Commissioner.



Northside Christian College

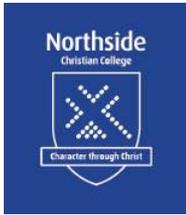
POLICY

Privacy

Conduct that breaches this Policy

Conduct that breaches this policy is unacceptable and, depending on the severity and circumstances, may lead to disciplinary action regardless of the seniority of the particular employee(s) involved.

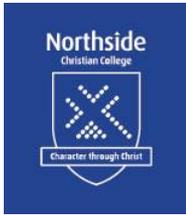
The College shall take appropriate disciplinary action against any employee who breaches this policy in accordance with the procedures outlined in the College's Unsatisfactory Work Performance Policy and Procedures.



Appendix 1

Northside Christian College Standard Collection Notice

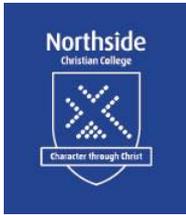
1. The College collects personal information, including sensitive information about students and Parents or guardians before and during the course of a student's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to provide schooling to the student and to enable them to take part in all the activities of the College.
2. Some of the information the College collects is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
3. Laws governing or relating to the operation of a College require certain information to be collected and disclosed. These include relevant Education Acts, Public Health and Child Protection laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. The College may ask you to provide medical reports about students from time to time.
5. The School may disclose personal and sensitive information for educational, administrative and support purposes. This may include to: other schools and teachers at those schools; government departments; medical practitioners; people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, counsellors and providers of learning and assessment tools; assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority; people providing administrative and financial services to the School; anyone you authorise the School to disclose information to; anyone to whom the School is required or authorised to disclose the information to by law, including child protection laws.
6. Personal information collected from students is regularly disclosed to their Parents or guardians.
7. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of 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 that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
8. The College's Privacy Policy sets out how Parents or students may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the student, or where students have provided information in confidence.
9. The College Privacy Policy also sets out how you may complain about a breach of privacy and how the College will deal with such a complaint.
10. The College from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the College's fundraising activities solely for that purpose. The College will not disclose your personal information to third parties for their own marketing purposes without your consent.
11. On occasions, information such as academic and sporting achievements, student activities and similar news is published in College newsletters and magazines, on the College website and through College networking and social media accounts. Photographs and videos of student activities such as sporting events, College camps and College excursions may be taken for publications such as the College yearbook, newsletters and magazines, and on our website.
12. If you provide the College with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the College and why,



Appendix 2

Alumni Association Collection Notice

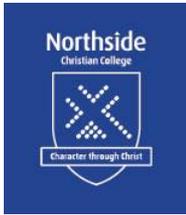
1. The Alumni Association may collect personal information about you from time to time. The primary purpose of collecting this information is to enable it to inform you about its activities and the activities of the College and to keep alumni members informed about other members.
2. The Alumni Association must have the information referred to above to enable it to continue your membership of the Alumni Association.
3. From time to time the Alumni Association engages in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the College to assist in its fundraising activities. If you do not agree to this, please advise the Alumni Association now.
4. The Alumni Association may publish details about you in our newsletters and magazines, on the College website and through College networking and social media accounts.. If you do not agree to this you must advise the Alumni Association now.
5. The College's Privacy Policy, which is available on the College's website, contains details of how you may seek access to personal information collected about you or how you may complain about a breach of the APPs.
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
7. If you provide personal information to The Alumni Association about other people, the College encourages you to inform them of the above matters.



Appendix 3

Employment Collection Notice

1. In applying for a position at the College, you will be providing the College with personal information.
2. If you provide the College with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file if your application is unsuccessful in case another position becomes available.
3. The College may disclose information provided to us in your application to a third party for the purposes of verification and to assess your application e.g. verification of previous employment, qualifications.
4. Unless you are a registered teacher, the College is required to ensure that you have an employee blue card. The College may also collect personal information about you in accordance with Child Protection laws and regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences.
5. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
6. The College's Privacy Policy, which is available on our website, contains details of how you may complain about a breach of the Acts or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
7. If you provide the College with the personal information of others, the College encourages you to inform it that you are disclosing that information to the College and why.



Appendix 4

Contractor/Volunteer Collection Notice

1. In applying to provide services to the College, you will be providing the College with personal information.
2. If you provide the College with personal information, for example your name and address or information contained on your resume, the College will collect the information in order to assess your application. It may also make notes and prepare a confidential report in respect of your application.
3. You agree that the College may store this information.
4. The College will not disclose this information to a third party without your consent.
5. The College may be required to ensure that you have a Child Protection blue card. The College may also collect personal information about you in accordance with Child Protection laws and regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences
6. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
7. The College's Privacy Policy, which is available on the College's website, sets out how you may seek access to your personal information and how you may complain about a breach of the APPs and how you may seek access to and correction of your personal information which the School has collected and holds. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
8. If you provide the College with the personal information of others, the College encourages you to inform them that you are disclosing that information to the College and why.