



Privacy Policy

Privacy Policy

Purpose:	Townsville Christian College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the College and describes how the College uses and manages personal information provided to or collected by it.	
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the College site; 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.	
Supersedes:	Privacy Policy dated 3 rd October 2024	
Status:	Approved	Date of Authorisation: 11 th December 2025
Authorised by:	Townsville Christian College Limited Board of Directors	
References:	<ul style="list-style-type: none"> • Australian Privacy Principles • Privacy Act 1988 (Cth) • Townsville Christian College Financial Records Retention Policy • Townsville Christian College Reporting Concerns of Harm and Abuse Policy • Townsville Christian College Student Disability Discrimination Policy • Townsville Christian College Complaints Policy 	
Review Date:	Annually, as appropriate, to take account of new laws and technology, changes to College’s operations and practices and to make sure it remains appropriate to the changing environment.	Next Review Date: December 2026
Policy Owner:	Townsville Christian College Limited Board of Directors	

Version control & document history

Date	Summary of modifications made	Version
11 th December 2025	<ul style="list-style-type: none"> • Update to bring in line with the current ISQ template 	11 th December 2025
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2 June 2020	<ul style="list-style-type: none"> • Minor formatting updates made throughout document 	13 th April 2021

Exception in Relation to Employee Records:

Under the *Privacy Act 1988* (Cth) (Privacy Act), as amended, 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 Townsville Christian College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Townsville Christian College and employee.

Definitions

In this Privacy Policy, we observe the definitions as provided by the *Privacy Act*.

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

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, biometric information or criminal record that is also classified as personal information about an individual.

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.

Use means to handle or conduct an activity with personal information within the organisation's control.

Disclose means to share personal information with another person or organisation outside the entity that originally collected the information.

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

Policy

Townsville Christian College is committed to managing personal information as per the requirements of the *Privacy Act 1988* (the Act), including the Australian Privacy Principles.

What personal information is collected

The type of information Townsville Christian College collects and holds, includes (but is not limited to) personal information, including sensitive and health information, about:

- students and parents and/or guardians before, during and after the course of a student's enrolment at the college:

- name, contact details (including next of kin), date of birth, gender, language background, previous college and religion
- parents' education, occupation, language spoken at home, nationality and country of birth
- Health information (e.g. details of disability and/or allergies, absence notes, medical reports, immunisation details, and names of doctors)
- conduct and complaint records, or other behaviour notes, and college reports
- information about referrals to government welfare agencies
- counselling reports
- health fund details and Medicare number
- any court orders
- volunteering information
- photos and videos at college events
- job applicants, staff members, volunteers and contractors:
 - name, contact details (including next of kin), date of birth, and religion
 - information on job application
 - professional development history
 - salary and payment information, including superannuation details
 - medical information (e.g. details of disability and/or allergies, and medical certificates)
 - complaint records and investigation reports
 - leave details
 - photos and videos at college events
 - workplace surveillance information
 - work emails and private emails (when using work email address) and Internet browsing history.
- other people who come into contact with the college including name and contact details and any other information necessary for the particular contact with the college.

How personal information is collected

Personal information provided by students and families

Townsville Christian College will generally collect personal information held about an individual by way of forms completed by parents/carers or students, face-to-face meetings and interviews, photos and video recordings, observations, emails and telephone calls.

Personal information provided by other people

In some circumstances Townsville Christian 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 transfer note from another college.

Personal information generated by artificial intelligence (AI) systems

Townsville Christian College might also collect personal information by using AI systems to generate it. The kinds of personal information that may be generated by AI systems include those set out above under the heading 'What personal information is collected'.

Personal information from other sources

Townsville Christian College may collect personal information through surveillance activities such as but not limited to CCTV security cameras, staff and student email monitoring, file sharing and real time screen monitoring.

How personal information is used

Townsville Christian College will use personal information it collects for the primary purpose of collection. Personal information may also be used for a secondary purpose that is related to the primary purpose of collection, where this would be reasonably expected or has been consented to.

Students and Parents/Carers

In relation to personal information of students and parents/carers, Townsville Christian College's primary purpose of collection is to enable the provision of schooling to enrolled students; fulfil the college's legal obligations including duty of care; and perform administrative activities. This includes satisfying the needs of students, parents/carers, and Townsville Christian College, throughout the whole period a student is enrolled at the college.

In cases where Townsville Christian College requests personal information about a student or parent/carer, and the information requested is not provided, Townsville Christian 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.

Personal information such as academic and sporting achievements, student activity details and similar news, including photographs and videos, may be published in college newsletters and magazines, the college website, or for marketing purposes (see Marketing below).

Townsville Christian College will obtain permission on enrolment from the student's parent and/or guardian (and from the student if appropriate) to include photographs or videos or other identifying information in promotional material or otherwise make publicly available. It is the responsibility of the parent and/or guardian to inform the college in writing if they wish to change their permission.

Job applicants and potential contractors

In relation to personal information of job applicants and potential contractors, Townsville Christian College's primary purpose of collection is to assess and (if successful) to engage with the applicant or contractor.

The purposes for which Townsville Christian College uses personal information of job applicants and potential contractors, includes:

- administration of the individual's employment or contract
- insurance
- to satisfy the college's legal obligations e.g., in relation to child protection legislation.

Volunteers

Townsville Christian College collects personal information about volunteers who assist the college's functions or conduct associated activities, such as alumni associations. The purposes for which Townsville Christian College uses personal information of volunteers, includes:

- to contact the volunteer, and administer, the volunteer position
- for insurance purposes
- to satisfy the college's legal obligations, e.g., in relation to child protection legislation.

Fundraising

Townsville Christian College may collect personal information from parents, staff, alumni, contractors and members of the college when seeking donations or undertaking fundraising activities.

Personal information held by Townsville Christian College may be disclosed to organisations that assist in the college's fundraising, e.g., the Townsville Christian College's alumni organisation or, on occasions, external fundraising organisations.

Marketing

Townsville Christian College may use or disclose the personal information that it holds about an individual, including students, staff, parents, volunteers, alumni and other members of the college community, for the purpose of direct marketing, with the consent of the relevant parties.

Personal information in this context may include photographs and videos featured in college publications, such as newsletters, magazines, online and social media, and other marketing collateral.

To opt-out of direct marketing or change previous preferences contact Townsville Christian College on/at 07 4448 3111 or info@tsvcc.qld.edu.au

When Townsville Christian College collects personal information from a third party, this information will only be used for the purposes of direct marketing, with the consent of the relevant parties. In this case, Townsville Christian College will provide an opt-out option.

Automated Decisions

Townsville Christian College may use personal information in the operation of computer programs (e.g. RollCall) to make, or assist in making, certain decisions (*automated decisions*). The personal information used for this purpose could include but not be limited to name and contact details. The decisions made using this personal information in the operation of computer programs are as follows:

- scheduling
- allocations
- notifications
- LMS
- other decisions as notified by us from time to time.

Artificial Intelligence (AI) Systems

Townsville Christian College may use personal information in connection with an AI tool. The kinds of personal information that may be generated by AI systems include those set out above, under the heading 'What personal information is collected'.

Disclosure and Storage of Personal Information

Townsville Christian College may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes.

This may include:

- another college or staff at another college
- government departments (including for policy and funding purposes)
- medical practitioners
- people providing educational, support and health services to the college, 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 (ACARA), the Queensland Curriculum and Assessment Authority (QCAA), and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- people providing administrative and financial services to Townsville Christian College
- recipients of College publications, such as newsletters and magazines
- students' parents/carers or guardians
- anyone parents/carers authorise Townsville Christian College to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws
- third party providers of the AI systems.

Disclosure and Storage of personal information overseas

Townsville Christian College may disclose your personal information to overseas recipients in the course of providing services. Under the Privacy Act, Townsville Christian College is required to take reasonable steps to ensure that any overseas recipient does not breach the Australian Privacy Principles (APPs).

In some cases, the Australian Government may designate certain countries or international frameworks as having substantially similar privacy protections to those in Australia. If a recipient is located in a country that has been officially whitelisted by the Minister, Townsville Christian College may rely on that designation to satisfy our obligations under the Privacy Act.

As of the date of this policy, no countries have been formally whitelisted. Therefore, Townsville Christian College continues to assess and ensures that any overseas recipient handles personal information in accordance with the APPs.

Townsville Christian College may disclose personal information about an individual to overseas recipients e.g., to facilitate a college exchange. However, Townsville Christian 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)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Townsville Christian College may use online or 'cloud' service providers to store personal information and to provide services to Townsville Christian College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Personal information may be disclosed, when necessary, to these service providers to enable authentication of users that access their services. This personal information may be stored in the 'cloud' which means it may reside on a cloud service provider's server, which may be situated outside Australia.

Townsville Christian College uses centralised information management and storage systems (Systems) provided by third party service providers. Personal information is disclosed and stored with third party service providers for the purpose of providing services to the college in connection with the Systems.

Systems providing services to the college include but are not limited to:

- TASS
- RollCall
- Workhub
- Workforce
- Class Dojo
- Google Apps for Education

Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. College 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.

The data centres where the personal information is likely to, but not limited to be kept are located in the USA, Taiwan, Singapore, Ireland, Netherlands and Belgium.

Management and Security of personal information

Townsville Christian College's staff are required to respect the confidentiality of students' and parent/carers' personal information and the privacy of individuals. Townsville Christian College has in place steps, including technical and organisational measures, to protect the personal information held, from misuse, interference and loss; unauthorised access; and modification or disclosure by use of various methods, including locked storage of paper records, and password access rights to computerised records.

Data Breaches

Townsville Christian College will deem an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of personal information, or a loss of personal information, held by the college
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result

Serious harm may include serious physical, psychological, emotional, economic and financial harm, as well as serious harm to reputation.

Eligible data breach assessment/investigation

If Townsville Christian College suspects that an eligible data breach has occurred, it will take reasonable steps to assess/investigate within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then Townsville Christian College will be required to lodge a statement to the Privacy Commissioner (Commissioner). Where practical to do so, the college will also notify the affected individuals. If it is not practicable to notify the affected individuals, Townsville Christian College will publish a copy of the statement on its website or publicise it in another manner.

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

Access and Correction of Personal Information

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

To make a request to update any personal information Townsville Christian College holds, please contact the Administration Office in writing. To make a request to access and personal information, please contact the Principal in writing. Townsville Christian College may require you to verify your identity and specify what information you require. A reasonable fee may be charged to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the likely cost will be advised in advance.

If access to that information cannot be provided, written notice explaining the reasons for refusal will be provided.

The college will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

Consent and Rights of Access to the Personal Information of Students

Townsville Christian College respects every parent/carer's right to make decisions concerning their child's education. Generally, any requests for consent and notices in relation to the personal information of a student will be referred to the student's parents/carers. Townsville Christian College will treat consent given by parents/carers as consent given on behalf of the student and notice to parents/carers will act as notice given to the student.

As mentioned above, parents/carers may seek access to personal information held about them or their child by contacting the [College Principal] by telephone or in writing. However, there will be occasions when access is denied. Such occasions may include (but are not limited to):

- where release of the information would have an unreasonable impact on the privacy of others
- where the college believes the student has capacity to consent and the college is not permitted to disclose the information to the parent/carer without the student's consent
- where the release may result in a breach of the college's duty of care to a student.

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

Enquiries and Complaints

For further information about the way Townsville Christian College manages personal information, contact [insert relevant contact at the college].

To make a complaint about Townsville Christian College's breach of the Australian Privacy Principles refer to [College Name's] Complaints Handling Policy.

Further information is available from the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

APPENDIX 1

Standard Collection Notice

How and Why the College Collects Personal Information

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 College might also use artificial intelligence (AI) systems to generate your personal information. We may also collect personal information from third parties.
2. The primary purpose of collecting this information is to enable the College to provide collegeing to students enrolled at the college, exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable students to take part in all the activities of the College.
3. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
4. Laws governing or relating to the operation of a college require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
5. Health information about students is sensitive information within the terms of the Australian Privacy Principles (APPs) under the *Privacy Act 1988*. We may ask you to provide medical reports about students from time to time.
6. A student's enrolment may be delayed or prevented if the College cannot collect certain personal information. This is particularly so where the information is relevant to the health and safety of the student, other students and/or staff.
7. 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.

To Whom Does the College Disclose Information

8. The College may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
 - other colleges and teachers at those colleges;
 - government departments (including for policy and funding purposes);
 - medical practitioners;
 - people providing educational, support and health services to the College, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
 - Organisations that assist us with Fundraising (see para 17 below);
 - providers of learning and assessment tools;
 - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);
 - The third party providers of our information management and storage systems (for the purpose of the providers providing services to the College in connection with the systems);
 - Third party providers of the AI systems we use;
 - People providing other information technology services to the College (see also para [12] to [13] or [14] below);

- people providing administrative and financial services to the College;
 - anyone you authorise the College to disclose information to; and
 - anyone to whom the College is required or authorised by law, including child protection laws, to disclose the information.
8. Personal information collected from students is regularly disclosed to their parents or guardians.
 9. College activities and news (including student achievements) are frequently published in the College's journals, newsletters and magazines, on our Orbit App, or otherwise shared with the College community (current, future and past students, parents and teachers). This may include personal information (including photographs and videos) of students and parents involved in College activities such as academic and sporting events and achievements, concerts and plays, college camps and college excursions. The College will obtain permissions on enrolment if we would like to include photographs or views or other identifying material of students (or parents) in our promotional material or otherwise make this material available to the public such as on the internet.
 10. The College may include students' and students' parents' contact details in a class list and College directory.

Overseas Storage and/or Disclosure

11. The College may use online or 'cloud' service providers to store personal information and to provide services to the College 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 College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
12. The College uses centralised information management and storage systems (Systems) provided by third party service providers. Personal information is stored with an accessible by the third party service providers for the purpose of providing services to the College in connection with the Systems.
13. The College may disclose your personal information to overseas recipients in the course of providing our services. Under the Privacy Act, Townsville Christian College is required to take reasonable steps to ensure that any overseas recipient does not breach the Australian Privacy Principles (APPs). In some cases, the Australian Government may designate certain countries or international frameworks as having substantially similar privacy protections to those in Australia. If a recipient is located in a country that has been officially whitelisted by the Minister, the College may rely on that designation to satisfy our obligations under the Privacy Act. As of the date of this notice, no countries have been formally whitelisted. Therefore, the College continues to assess and ensures that any overseas recipient handles your personal information in accordance with the APPs.
14. The College uses AI systems that are provided by third parties. These third parties may store or have access to personal information input into, and/or generated by, these AI systems. These third parties may be located outside of Australia.

Your Rights and How to Complain

15. The College's Privacy Policy, accessible on the College's website, sets out how parents or students may seek access to and correction of their personal information which the College has collected and holds. However, access may be refused in certain circumstances such as

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 a student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.

16. The College's Privacy Policy also sets out how parents and students can make a complaint about a breach of the APPs and how the complaint will be handled.

Fundraising

17. The College may engage 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].
18. The College will not disclose your personal information to third parties for their own marketing purposes without your consent.

APPENDIX 2

Employment Collection Notice

1. In applying for this position, you will be providing Townsville Christian College personal information. We can be contacted [insert address, email address, telephone number, and any other personal information that will be collected.
2. If you provide us 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's Privacy Policy, accessible on the College's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted. We usually disclose this kind of information to the following types of organisations e.g. support vendors that provide services around staff administration systems.
5. The College may use online or 'cloud' service providers to store personal information and to provide services to the College 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 College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
6. The College uses centralised information management and storage systems (Systems) provided by third party service providers. Personal information is stored with an accessible by the third party service providers for the purpose of providing services to the College in connection with the Systems.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.

APPENDIX 3

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the College, you will be providing [name of College] with personal information. We can be contacted [insert address, email address, telephone number, and any other personal information that will be collected].
2. If you provide us 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. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for [insert amount of time].
4. The College's Privacy Policy, accessible on the College's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
5. We will not disclose this information to a third party including third party providers of the AI systems we use, without your consent unless otherwise permitted to. / We usually disclose this kind of information to the following types of organisations e.g. support vendors that provide services around administration systems. These third parties may be located outside Australia.
6. The College may use online or 'cloud' service providers to store personal information and to provide services to the College 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 College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
7. The College uses centralised information management and storage systems (Systems) provided by third party service providers. Personal information is stored with an accessible by the third party service providers for the purpose of providing services to the College in connection with the Systems.
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.