

SECTION	GENERAL			
ITEM:	PRIVACY POLICY			ITEM No: G-001
ISSUED:	14-5-07 (Board Approved)			PAGES: 13
RESPONSIBILITY:	College Board			VERSION: 2020.1

REVISED:	28/05/2014	30/11/2016	30/01/17	27/5/2020	
NEXT REVIEW:	2017	2019	2020	2021	

1. PURPOSE

This policy outlines Brisbane Christian College’s policy on how Brisbane Christian College uses and manages personal information provided to or collected by the College online and offline.

Brisbane Christian College is bound by the Australian Privacy Principles contained in the Commonwealth *Privacy Act (1988)*. This policy outlines the privacy standards of the College and describes how the College uses and manages personal information provided to or collected by it.

2. SCOPE

This 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, and to whom the information is disclosed, and how the information may be accessed.

3. SOURCES

- *Privacy Act 1988 (Cth)*
- *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and accompanying Regulations.
- *Privacy Amendment (Notifiable Data Breaches) Bill 2016 (Cth)*
- Australian Privacy Principles

4. DEFINITIONS

- **Personal Information:** Information or an opinion about an identifiable individual or an individual who is reasonably identifiable whether the information is true or not, and whether the information is recorded in a material form or not. It includes all personal information regardless of its source.
- **Sensitive Information:** This is a type of personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information.
- **Eligible Data breach:** An eligible data breach occurs if:

- There is unauthorised access to, unauthorised disclosure of or loss of personal information held by an organisation and the loss is likely to result in *serious harm* to any of the individuals to whom the information is related; or
- The unauthorised access to or unauthorised disclosure of the information is likely to occur and if the breach did occur, a reasonable person would conclude that the access or disclosure would conclude that the access or disclosure would be likely to result in *serious harm* to any of the individuals to whom the information relates.

5. POLICY

This Privacy Policy sets out how Brisbane Christian College manages personal information provided to or collected by it. Brisbane Christian College is bound by the Australian Privacy Principles contained in the Privacy Act Brisbane Christian College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Brisbane Christian College's operations and practices and to make sure it remains appropriate to the changing school environment.

What kind of personal information does Brisbane Christian College collect and how does Brisbane Christian College collect it?

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

- students and parents and/or guardians ('Parents') 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 school and religion;
 - parents' education, occupation and language background;
 - medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
 - conduct and complaint records, or other behaviour notes, and school reports; information about referrals to government welfare agencies;
 - counselling reports;
 - health fund details and Medicare number;
 - any court orders;
 - volunteering information; and
 - photos and videos at school 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 school events;
 - workplace surveillance information;

- work emails and private emails, when using work email address, as well as Internet browsing history when using the College ICT services and devices.
- other people who come into contact with the School including name and contact details and any other information necessary for the particular contact with the school.

Information provided by digital communications interaction:

Brisbane Christian College will generally collect information about how users interact with digital communications; including but not limited to email, SMS, e-newsletters, social media. When the communication is directed to an individual, this information is collected and stored securely and treated in the same manner as that provided by forms or face-to-face meetings.

Information provided by website interaction:

Brisbane Christian College will generally collect information on all visitors to websites that we operate, this information will be in the form of IP address, of which general location and returning visits can be deducted. General information about the time on the website, pages visited and interaction with all website elements will be recorded and stored. Third-party vendors, including Google, are utilised to collect and manage this information using cookies and other web technologies.

Personal Information you provide:

Brisbane Christian 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, and telephone calls. On occasions people other than parents and students provide personal information.

Personal Information provided by other people:

In some circumstances Brisbane Christian College may be provided with personal and sensitive information about an individual from a third party, for example a report provided by a medical professional or a reference from another College.

Exception in relation to employee records:

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

How will Brisbane Christian College use the personal information you provide?

Brisbane Christian 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, or to which you have consented.

Website Visitors:

Information collected about website visitors will be used for remarketing to similar audiences and to aid online advertising efforts along with the continual improvement of the website.

Visitors can opt-out of Google's use of cookies by visiting Google's [Ads Settings](#). Alternatively, visitors can opt out of a third-party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

Students and Parents:

In relation to personal information of students and parents, Brisbane Christian College's primary purpose of collection is to enable Brisbane Christian College to provide schooling for the student enrolled at the College, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all activities of the College. This includes satisfying both the needs of parents, the needs of the student and the needs of Brisbane Christian College throughout the whole period the student is enrolled at the College.

The purposes for which Brisbane Christian College uses personal information of students and parents include:

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

In some cases, where Brisbane Christian College requests personal information about a student or parent, if the information requested is not provided, Brisbane 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.

On occasions information such as academic and sporting achievements, student activities and similar news is published in College newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. The College will obtain permissions from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos, or other identifying material, in our promotional material or otherwise make this material available to the public such as on the internet.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, Brisbane Christian 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 Brisbane Christian College uses personal information of job applicants, staff members and contractors include:

- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for Brisbane Christian College;
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

Volunteers:

Brisbane Christian College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, to enable the College and the volunteers to work together.

Marketing and fundraising:

Brisbane Christian 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 be 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.

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.

If you would like to opt-out of direct marketing, please contact the College Head of Marketing on 07 3719 3111.

To whom might Brisbane Christian College disclose personal information?

Brisbane Christian College may disclose 'personal' information, including 'sensitive' information, held about an individual for educational, legal, administrative, marketing and support purposes. This may include to:

- another school or staff at another school;
- government departments;
- 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) and NAPLAN Test Administration (who will disclose it to the entity that manages the online platform for NAPLAN);
- people providing administrative and financial services to the College;
- student's parents or guardians;
- recipients of Brisbane Christian College publications, like newsletters and magazines; (limited in these cases to 'personal' information only, such as name and year level attached to a student in a photo);
- anyone you authorise Brisbane Christian College to disclose information to; and
- anyone to whom we are required or authorised to disclose information to by law, including child protection laws.

Sending information overseas:

Brisbane Christian College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Brisbane 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); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Brisbane Christian 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 be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

The College also uses Microsoft 365 and Azure services. The College have specified that these applications remain hosted in Australia.

Another cloud service provider the College uses is Google. Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. College personnel 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.

How does Brisbane Christian College treat sensitive information?

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

Brisbane Christian College's staff is required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. Brisbane Christian College has in place steps to protect the personal information the College holds from misuse, loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

Data Breaches

It will be deemed that an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (the affected individuals); or
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result; and
- the information is lost in circumstances where:
 - unauthorised access to, or unauthorised disclosure of, the information is likely to occur; or

- assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

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

What must the school do in the event of an 'eligible data breach'?

If Brisbane Christian College suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then Brisbane Christian College will be required to lodge a statement to the Australian Privacy Commissioner. Where practical to do so, the College will also notify the affected individuals. If it is not practicable to notify the affected individuals, the 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; and/or
- 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.

Updating personal information

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information that Brisbane Christian College holds about them and to advise the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally have access to their personal information through their parents.

To make a request to access any information the College holds about you or your child, please contact the College Principal in writing.

Brisbane Christian College may require you to verify your identity and specify what information you require. The College may charge a fee to cover the cost of verifying your 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 we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

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

Brisbane Christian College respects every parent's right to make decisions concerning their child's education.

Generally, Brisbane Christian 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.

Parents may seek access to personal information held by the College about them or their child by contacting the College Principal. 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.

Overseas Students

Overseas students, who are enrolled at Brisbane Christian College, should be made aware that information provided, by the student to the College, may be made available to Commonwealth and State agencies and the Fund Manager of the ESOS Assurance Fund, pursuant to obligations under the ESOS Act 2000 and the National Code 2018. Acknowledgement of this disclosure would be in the form of signature of acceptance on the College's enrolment form; which should clearly state the above.

Enquiries and complaints

If you would like further information about the way the College manages the personal information it holds, or wish to make a complaint about Brisbane Christian College's breach of the Australian Privacy Principles, please contact the College Principal in writing or use the feedback form located on the College website. Brisbane Christian College will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.

6. RELATED DOCUMENTS

- Appendix 1 Standard Collection Notice
- Appendix 2 Alumni Association Collection Notice
- Appendix 3 Employment Collection Notice
- Appendix 4 Contractor/Volunteer Collection Notice
- G-006.1 Complaints Handling Procedure
- CPP-000 & CPP-001 Brisbane Christian College Child Protection Strategy and Policy
- ST- 006 Brisbane Christian College Students with Disabilities Policy
- http://www.corneyandlind.com.au/resource-centre/not-for-profit/schools/changes-privacy-act-1988-cth-implications-schools/?utm_source=UPDATE+-+Charities+%7C+Privacy+%7C+Director+Liability+%7C+Family+Law+Parenting+Webinar&utm_campaign=Jan+Update&utm_medium=email

APPENDIX 1

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 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.
2. 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.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
4. 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.
5. The College may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
 - other schools and teachers at those schools;
 - government departments (including for policy and funding purposes);
 - medical practitioners;
 - people providing educational, support and health services to the School, including specialist visiting teachers, sports coaches, volunteers, and counsellors;
 - 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);
 - 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.
6. Personal information collected from students is regularly disclosed to their parents or guardians.
7. 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.
8. 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.
9. 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.

10. 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. We 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 our intranet and on our website this may include photographs and videos of student activities such as sporting events, school camps and school excursions. The College will obtain permissions from the student's parent or guardian (and from the student if appropriate) if we would like to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet.
12. We may include students' and students' parents' contact details in a class list and College directory. The College will seek specific consent in these instances.
13. 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 College may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of Brisbane Christian College and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of the Alumni Association.
3. As you know, from time to time we engage 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 us now.
4. The College may publish details about you in our publications and our College website. If you do not agree to this, you must advise us now.
5. The College's Privacy Policy, accessible on the College's website, contains details of how you may seek access to and correction of your personal information which the College has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
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 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.
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

Employment Collection Notice

1. In applying for this position, you will be providing Brisbane Christian College with personal information.
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.
5. We are required to conduct a criminal record check collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.
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 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.
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 4

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the College, you will be providing Brisbane Christian College with personal information. We can be contacted at office@briabanechristiancollege.com.au or (07) 3719 3111.
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.
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 School 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 without your consent unless otherwise permitted to.
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. 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.