

PRIVACY POLICY

Faith Diligence Love

SUNCOAST
CHRISTIAN COLLEGE



Document Information

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Christian Outreach Centre
t/a Suncoast Christian College
CRICOS Provider No: 00539J

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Policy

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

Purpose

This statement outlines the privacy policy of the College and describes how the College uses and manages personal information provided to, or collected by the College.

Scope

This policy applies to board members, employers, employees, volunteers, parents/guardians, students, contractors and visitors to 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.

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.

Reference

Privacy Act 1988 (Cth)

Privacy Amendment (Enhancing Privacy Protection) Act 2012

Child Protection Policy

Disabilities Policy

Review & version control

The Principal is considered the owner of this policy.

An annual review of this policy is recommended. The College, from time to time, may review and update this policy, subject to new laws and technology, changes to College operations and practices and to make sure it remains appropriate to the changing environment.

Collection of personal information

The information collected and held by the College includes (but is not limited to) personal information, including health and other sensitive information, about:

- students and parents/guardians before, during and after the students' 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, visitors 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; and
 - work emails and private emails (when using work email address) and Internet browsing history.
 - other people who come in contact with the College including name and contact details and any other information necessary for the particular contract with the College.

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

The College may receive personal information about an individual from a third party, such as a report provided by a medical professional or a reference from another school.

Use of personal information

Students and parent/guardians

The College will use personal information it collects for the primary purpose of collection and for such secondary purposes that are related to the primary purpose of collection and as reasonably expected, or to which the person concerned has consented.

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

The purpose of use of personal information of student/s and parents/guardians may include:

- to keep parents/guardians informed about matters related to the student's education, through correspondence, newsletters and magazines;
- day-to-day administration of the College;
- looking after student/s educational, social and medical well-being;
- to satisfy Government reporting requirements;
- seeking donations and marketing of 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/guardian, 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.

Job applications, staff members and contractors

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

The College uses personal information of job applicants, staff members and contractors:

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

Volunteers

The College 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.

Marketing and fundraising

The College treats marketing and the seeking of 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 an organisation that assists in the College's fundraising (for example, the College's foundation or alumni organisation, or, on occasion, external fundraising organisations).

Parents/guardians, 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.

Use of personal information

The College may, from time to time, engage outside agencies to assist in the day to day running of the College and to provide a better service to the parents/guardians, (i.e. Flexischools, School Seconds etc.). The College will not share personal details with these agencies and recommend that the privacy policy of these agents be reviewed prior to supplying personal details.

Disclosure of personal information

The College may disclose personal information, including sensitive and health information, about an individual for educational, administrative and support purposes. This may include to:

- another school or staff at another school;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the College including specialists visiting teachers, sport 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 Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);

- people providing administrative and financial services to the College;
- recipients of College publications such as newsletters and magazines;
- students' parents/guardians;
- visitors to the College website;
- anyone to whom a person authorises the College to disclose information; and
- anyone to whom the College is required or authorised to disclose the information to by law, including child protection laws.

Sending and storing information overseas

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, the College will not send personal information about an individual outside Australia without:

- obtaining the consent or implied consent of the individual; or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

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 external providers to authenticate users that access these 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 Microsoft Office 365.

Treatment of 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; health information and biometric information about that individual.

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

Management and security of personal information

The College staff are required to respect the confidentiality of student/s and parent/guardian/s personal information it collects and the privacy of individuals.

The College has in place steps to protect the personal information it 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.

Updating personal information

The College endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update personal information held by contacting the College at any time.

The College will request that parent/guardian's and volunteers update details annually.

Access and correction of personal information

Under the *Commonwealth Privacy Act*, an individual has the right to obtain access to any personal information which the College holds and to advise the College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access personal information through the parents/guardians, however Senior students may seek access and correction personally.

There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or to update any personal information the College holds, a written request may be made to the Principal. If the College cannot provide the information requested advice will be made in writing explaining the reason/s for refusal.

The College may require the person to verify identity and specify the information required. The College may charge a fee to cover the cost to locate, retrieve, review and copy any material requested. If the information sought is extensive, the College will advise the likely cost in advance.

Access to personal information of students

The College respects every parent/guardian's right to make decisions concerning the student's education.

Generally, the College will refer any request for consent and notices in relation to the personal information of a student to the student's parents/guardians. The College will treat consent given by parents/guardians as the consent on behalf of the student and notice to parents/guardians will act as notice to the student.

Parents/guardians may seek access to personal information held by the College, by making a written request to the Principal. Access to personal information may be denied by the College if the release of the information would have an unreasonable impact on the privacy of others or 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 the student access to information held by the College about them, or allow the student to give or withhold consent to the use of personal information, independently of the parents/guardians. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Enquiries & complaints

If further information about the way the College manages personal information held is required, or a complaint about a belief that the College has breached the Australian Privacy Principles contact the College Principal (principal@suncoastcc.qld.edu.au).

The College will investigate any complaint made and notify decision in relation to the complaint as soon as is practicable after the complaint has been received.

The College website

The College website incorporates a Privacy Statement about information collected and how this information is used. It also provides individuals with alternative means of providing personal information other than by telephone calls and written correspondence.

The College service provider will record each visit to the site and log the user's server address, the user's top level domain name, the date and time of the visit.

The information will be collected for statistical purposes only. No attempt will be made to identify users or their browsing activities except in the event of an investigation in which a law enforcement agency exercises a warrant to inspect the service provider's logs.

The following text will appear on the College website and on email addresses when individuals email the College:

- The College service provider makes a record of any visit and logs server address, top level domain name and the date and time of the visit to this site. No attempt will be made to identify browsing activities except in the event of an investigation in which a law enforcement agency exercises a warrant to inspect the service provider's logs.
- The College will only record the email address if a message is sent. The email address will only be used for the purpose for which it is provided it and will not be added to a mailing list. We will not use the email address for any other purpose nor disclose it, without consent.

Collection notices

A variety of collection notices will be used to ensure an individual is reasonably aware of privacy requirements in the Australian Privacy Principles and also to obtain consent for use/s and disclosure/s of personal information that may not be regarded as being for primary or secondary purposes to the collection.

The Standard Collection Notice (FORM 1) will be:

- reproduced in enrolment packages;
- contained in this Policy;
- located on the College's website; and;
- printed in the Parent Handbook, given to all new and existing parents/guardians and updated annually.

The **Alumni Association Collection Notice (FORM 2)** will be sent to all past students, where possible.

The **Employment Collection Notice (FORM 3)** will be sent to all job applicants with an acknowledgement of receipt of an application for employment at the College.

The **Contractor/Volunteer Collection Notice (FORM 4)** will be sent to all contractors (including instrumental music teachers) and volunteers. NB: *For volunteers the form is printed on the back of the Application for Volunteering & the Confirmation of Volunteering forms.*

Code of practice

All staff, who have access to personal information, need to read and abide by this policy. The policy is one of a list of College Policies that are presented to staff on employment and annually.

Such training for teaching staff is monitored by the Principal and for general staff monitored by the Business Manager.

APPENDIX 1 – Standard Collection Notice**STANDARD COLLECTION NOTICE**

- 1 Suncoast Christian College, (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, 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, administrative and support purposes. This may include to:
 - other schools and teachers at those schools;
 - government departments (including for policy and funding purposes);
 - International Network of Churches;
 - medical practitioners;
 - people providing educational, support and health services to the College, including specialist visiting teachers, sports coaches, SunArts teachers, 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 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 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 online or 'cloud' service providers is contained in the College's Privacy Policy.
- 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 the 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 at the time of enrolment from the student's parent or guardian (and from the student if appropriate) 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 parents/guardians' contact details in a class list and College directory.
- 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.
- 14 The information provided by an overseas 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 of Practice*.

IMPORTANT: Unless and until you advise us in writing that you do not consent to our use and disclosure of your personal information in the manner described in this notice, we will act on the basis that we have your consent to each such use and disclosure.

For further information on the College's Privacy Policy or to view a copy please contact the **Business Manager**.



APPENDIX 2 – Alumni Association Collection Notice

ALUMNI ASSOCIATION COLLECTION NOTICE

- 1 Suncoast Christian College, (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 the 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 Suncoast Alumni.
- 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 newsletters, magazines, on the intranet and on the College website. If you do not agree to this you must advise us now.
- 5 The College's Privacy Policy, accessible on the College 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

EMPLOYMENT COLLECTION NOTICE

- 1 In applying for this position you will be providing Suncoast Christian College, ('the College'), with personal information. We can be contacted by main PO Box 5254, SUNSHINE COAST MC QLD 4560 or email info@suncoastcc.qld.edu.au or telephone (07) 5451 3600.
- 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 website (www.suncoastcc.qld.edu.au), 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 and 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.

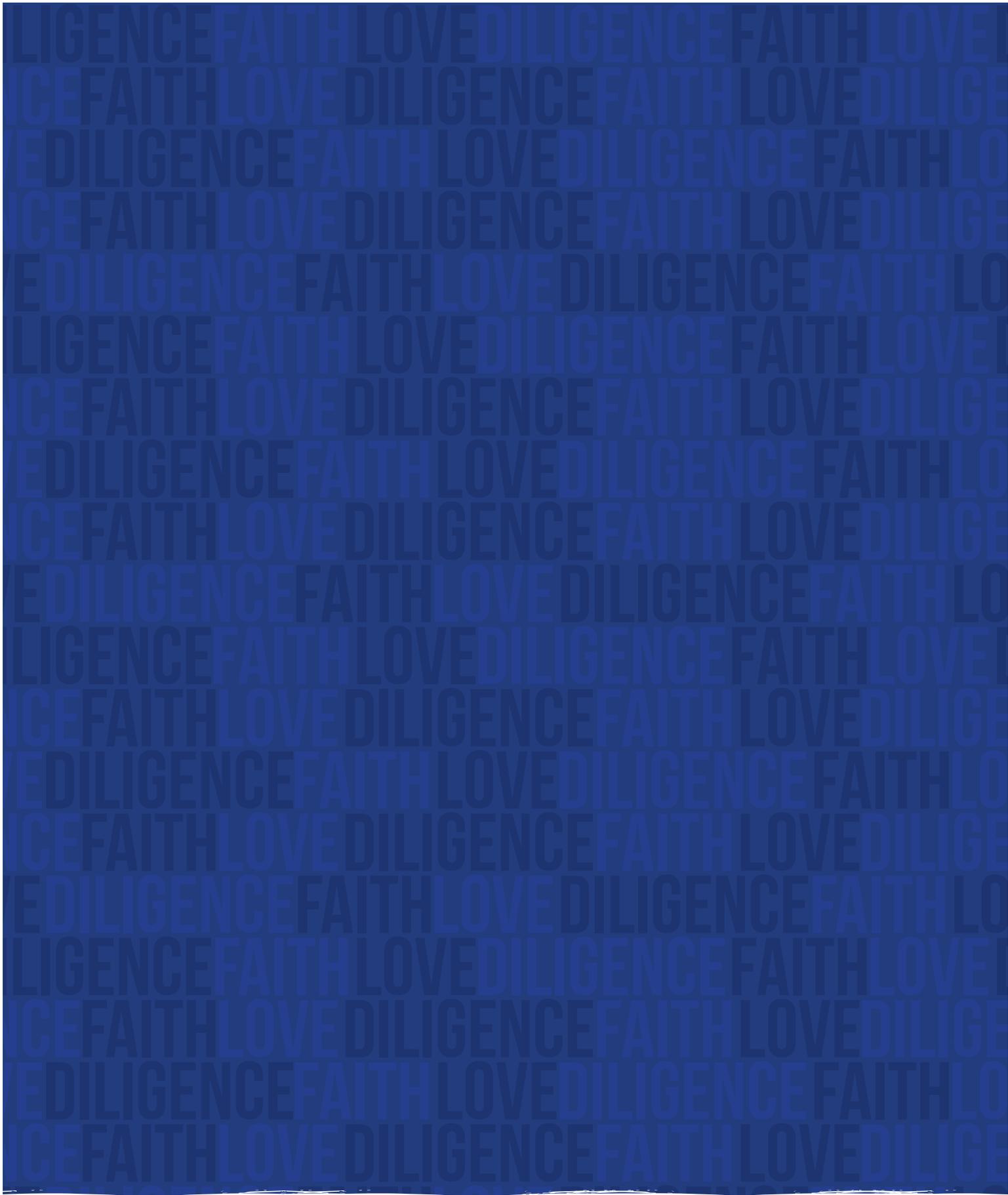


APPENDIX 4 – Contractor / Volunteer Collection Notice

CONTRACTOR / VOLUNTEER COLLECTION NOTICE

- 1 In offering, applying or agreeing to provide services to Suncoast Christian College, ('the College'), you will be providing the College with personal information. We can be contacted at PO Box 5254, SUNSHINE COAST MC QLD 4560, email info@suncoastcc.qld.edu.au or telephone (07) 5451 3600.
- 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 the term of the contract and thereafter, as required by the College.
- 4 The College's Privacy Policy, accessible on the College 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 without your consent unless otherwise permitted to.
- 6 We are required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect other personal information about you in accordance with these laws.
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SUNCOAST
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