



## PRIVACY POLICY

### 1. Purpose

This Privacy Policy sets out how Calvary 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 Privacy Act 1988 (*Cth*). 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.

### 2. Scope

The policy applies to College Council members, employees, volunteers, parents/carers, 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.

#### 2.1 References

- *Privacy Act 1988 (Cth)*
- *Privacy Amendment (Enhancing Privacy Protection) Act 2012*
- Australia Privacy Principles
- Child Protection Policy
- *Notifiable Data Breach Policy*
- *Complaints Handling Policy*

### 3. Review Date

This policy will be reviewed annually, or more frequently as appropriate, to take account of new laws and technology, changes to College's operations and practices, and to ensure it remains appropriate to the changing environment.

### 4. Exception in relation to employee records

Under the *Privacy Act 1988 (Cth)*, 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 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.

### 5. Privacy Officer

The Principal and CEO (Principal) will appoint a Privacy Officer to ensure compliance with this policy and the relevant legislation.

### 6. Personal information

Personal information means information or an opinion about an identified 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.



In other words, if the information or opinion identifies an individual or allows an individual to be identified, it will be 'personal information' within the meaning of the Privacy Act 1988 (Cth). It can range from very detailed information, such as medical records, to other less obvious types of identifying information, such as an email address.

Health Information means 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.

### **6.1 What kinds of personal information does the College collect and how does the College collect it?**

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

- students and parents and/or carers ('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/carers' education, occupation and language background;
- medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
- student email and computer use monitoring via a program called Linewize
- 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) 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.



## **6.2 Personal Information provided by parents/guardians and families**

The College will generally collect personal information 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. On occasions people other than parents/carers and students provide personal information.

## **6.3 Personal Information provided by other people**

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

## **6.4 Personal Information generated by artificial intelligence (AI) systems**

The 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 clause 6.1 'What kinds of personal information does the College collect and how does the College collect it?'.

## **6.5 Personal Information from other sources**

The College may collect personal information through surveillance activities (such as CCTV security cameras) and email monitoring.

## **6.6 How will the College use the personal information provided?**

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

## **7. 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 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.

## **8. Students, Parents and Carers**

In relation to personal information of students, parents and carers, the College's primary purpose of collection is to enable the Principal to provide schooling to students enrolled at the College, exercise Privacy Policy (2025)



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/carers, the needs of the student and the needs of the College throughout the period the student is enrolled at the College.

**8.1 The purposes for which the College uses personal information of students and parents/carers include:**

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

In some cases, where the College requests personal information about a student or parent/carer, 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.

On occasions information such as academic and sporting achievements, student activities and similar news is published in College publications, on our intranet, College managed social media sites and on the College website. This may include photographs and videos of student activities such as sporting events, College camps and excursions. The College will obtain permissions at the time of enrolment from the student's parent/carer to include such photographs or videos or other identifying material in our promotional material or otherwise make this material available to the public.

The Standard Collection Notice is attached as Appendix 1.

**9. Job applicants, Staff Members and Contractors**

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

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

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

The Employment Collection Notice and Contractor/Volunteer Collection Notice are attached as Appendices 2 and 3.



## 10. Volunteers

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

The Contractor/Volunteer Collection Notice are attached as Appendix 3.

## 11. Marketing and Fundraising

The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that it continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the alumni organisation. The Standard Alumni Association Collection Notice is attached as Appendix 4.

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

If you would like to opt-out of direct marketing, please contact the Administration Office.

## 12. Who might the College disclose personal information to?

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

- another school or staff at another school;
- government departments (including for policy and funding purposes);
- medical practitioners;
- transport companies;
- 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 the College;
- recipients of College publications, such as newsletters and journals, students' parents/carers
- anyone the individual authorises the College to disclose information to
- anyone to whom the College is required or authorised to disclose the information to by law, including child protection laws.
- third party providers of the AI systems or schools use



### 13. Sending Information Overseas

The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with 'cloud' service providers which are situated outside Australia or to facilitate a school exchange. Under the Privacy Act, the College is required to take reasonable steps to ensure that any overseas recipient does not breach the Australian Privacy Principles (APPs).

However, the College will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The 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.

### 14. Management and security of personal information

The College's staff are required to respect the confidentiality of students', parents'/carers' personal information and the privacy of individuals. The College has in place organisational and technical measures to protect the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure.

### 15. Data Breach

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**)
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result
- the information is lost in circumstances where:
  - unauthorised access to, or unauthorised disclosure of, the information is likely to occur
  - assuming unauthorised access to, or unauthorised disclosure of, the information were 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.

Should the College experience a data breach, the College will enact the Notifiable Data Breach Policy.

#### 15.1 Eligible data breach assessment/investigation



If the 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 the 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, the College will publish a copy of the statement on its website or publicise it in another manner.

### **15.2 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.

## **16. 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 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 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 access or update any personal information the College holds, please contact the College in writing. The 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.

## **17. Consent and Rights of Access to the Personal Information of Students**

The College respects every parent's/carer's right to make decisions concerning their child's education. Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to that student's parents/carers. The 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 by the College about them or their child by contacting the College. However, there will be occasions when access is denied. Such occasions would include (but are not limited to):



- where release of the information would have an unreasonable impact on the privacy of others
- where the school believes the student has the capacity to consent and the school 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 the student.

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

## 18. Enquiries and Complaints

If you would like further information about the way the College manages the personal information it holds or wish to complain that you believe that the College has breached the Australian Privacy Principles please contact the College. Complaints will be handled in accordance with the College's Complaints Policy, which is available on College website. If you are not satisfied with the outcome of your complaint, you may also contact the Office of the Australian Information Commissioner (OAIC).

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## Appendix 1

### Standard Collection Notice

1. Calvary 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 College might also use artificial intelligence (AI) systems to generate your personal information. The primary purpose of collecting this information is to enable the College to –
  - i keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines
  - ii managing day-to-day administration of the College
  - iii look after students' education, social and medical wellbeing
  - iv seek donations and marketing for the College;
  - v provide schooling to the student and to enable them 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 and meeting government requirements.
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 under the Privacy Act. We may ask you to provide medical reports about students from time to time.
5. The College from time to time discloses personal and sensitive information to others for administrative and educational purposes, including to facilitate the transfer of a student to another school. This includes to other schools, government departments, medical practitioners, and people providing services to the College, including specialist visiting teachers, [sports] coaches, volunteers and counsellors.
6. Personal information collected from students is regularly disclosed to their parents or guardians.
7. The College may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia. 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.
8. The College's Privacy Policy, available on the College's website, sets out how parents or students may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have



an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the student, or where students have provided information in confidence. Any refusals will be notified in writing with appropriate reasons.

9. The College's Complaints Handling Policy, available on the College's website, also sets out how you may complain about a breach of privacy and how the College will deal with such a complaint.
10. The College from time to time engages in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the College's fundraising activities solely for that purpose. 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 the College newsletters, website, Facebook and magazines. Photographs of student activities such as sporting events, camps and excursions may be taken for publication in College newsletters, magazines, Facebook, school App (ParentOrbit) and on our website. The College will obtain separate permissions from the student's parent or guardian prior to publication.
12. The College uses centralised information management and storage systems (Systems) provided by third party service providers. Personal information is stored with and 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, the College is required to take reasonable steps to ensure that any overseas recipient does not breach the Australian Privacy Principles (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.
15. 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, that they can access that information if they wish, and that the College does not usually disclose this information to third parties.



## Appendix 2

### Employment Collection Notice

1. In applying for this position, you will be providing Calvary Christian College (the College) with personal information. We can be contacted at [HR@calvarycc.qld.edu.au](mailto:HR@calvarycc.qld.edu.au).
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 and Complaints Handling Policy, available on the College's website, contain details of how you may complain about a breach of the Australian Privacy Principles (APPs) or 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 which 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. The College will not disclose this information to a third party without your consent; unless otherwise permitted.
5. The College may be required to conduct a criminal 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. The College 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 service 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.
7. The College uses centralised information management and storage systems provided by third party service providers. Personal information is stored with and 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 the College with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.



## Appendix 3

### Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to Calvary Christian College (the College), you will be providing the College with personal information. We can be contacted at [info@calvarycc.qld.edu.au](mailto:info@calvarycc.qld.edu.au).
2. If you provide the College with personal information, for example your name and address or information contained on a proposal, the College will collect the information in order to assess your application. The College may also make notes and prepare a confidential report in respect of your application.
3. You agree that the College may store this information for twelve months.
4. The College's Privacy Policy and Complaints Handling Policy, available on the College's website, contain details of how you may complain about a breach of the Australian Privacy Principles (APPs) or 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. The College will not disclose this information to a third party without your consent, unless otherwise permitted.
6. The College may be required to conduct a criminal 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. The College may also collect personal information about you in accordance with these laws.
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 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 service which may be situated outside Australia.
8. If you provide the College with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish and that the College does not usually disclose the information to third parties.



## Appendix 4

### Alumni Association Collection Notice

1. Cavalry 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. As you know, from time to time the College engages in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the College to assist in its fundraising activities. If you do not agree to this, please advise us now.
3. The College may publish details about you in our Journal, College publications and the College website. If you do not agree to this, you must advise us now.
4. The College's Privacy Policy and Complaints Handling Policy, accessible on the College website, contains details of how you may seek access to personal information collected about you or how you may complain about a breach of the Australian Privacy Principles.
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 server which may be situated outside Australia. Further information about the College's use of an 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 and accessible by the third party service providers for the purpose of providing services to the College in connection with the Systems.
7. 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.
8. If you provide personal information to the College about other people, we encourage you to inform them that you are disclosing that information to the College and why.