

SECTION	GENERAL				
ITEM:	PRIVACY POLICY			ITEM No:	G-001
ISSUED:	14-5-07 (Board Approved)			PAGES:	6
RESPONSIBILITY:	Principal			VERSION:	2017.1
REVISED:	28/05/2014	30/11/2016	30/01/17		
NEXT REVIEW:	2017	2019	2020		

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)* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

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 Brisbane Christian College environment.

2. SCOPE

This policy applies to all staff, volunteers and contractors of Brisbane Christian College.

3. SOURCES

Legislative references:

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

This policy was prepared with the assistance of NCISA the peak national body for the independent colleges sector, Independent Schools Queensland and advice from Corney & Lind Lawyers.

- <http://isca.edu.au/wp-content/uploads/2011/03/Privacy-Compliance-Manual-Amended-September-2013.pdf>
- 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

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

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:

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

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 the Australian Privacy Principles do not apply to an employee record. 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. This includes satisfying both the needs of parents and the needs of the student 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;
- 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 obtained, Brisbane Christian College may not be able to enrol or continue the enrolment of the student.

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, such as [alumni associations], 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 an organisation that assists in the College's fundraising, for example, the College's Foundation or alumni organisation.

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.

To whom might Brisbane Christian College disclose personal information?

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

- another college;
- government departments;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers and sports coaches;
- assessment and educational authorities, including the Australian Curriculum Assessment and Reporting authorities;
- people providing administrative and financial services to the College;
- student's parents or guardians
- recipients of Brisbane Christian College publications, like newsletters and magazines; parents;
- anyone you authorise Brisbane Christian College to disclose information to; and
- anyone to whom we are required to disclose information to by law.

Sending information overseas:

Brisbane Christian 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. 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.

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, sexual preferences 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

Where an *eligible data breach* has occurred, the Commissioner must be notified. The College must make a notification if it has *reasonable grounds* to believe the breach has happened, or is directed to do so by the Commissioner.

Not all data breaches are due to criminal hacks or other subversive conduct. They can occur from simple human behaviour leading to accidental loss or disclosure of personal information such as:

- lost or stolen laptops or misplaced paper records or employees accessing;
- or disclosing personal information outside the requirements or authorisation of their employment.

Where there is a suspected data breach, the organisation must carry out a reasonable and expeditious assessment within 30 days of the suspected breach.

Those who are personally affected by the breach will be individually notified.

Updating personal information

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

The Australian Privacy Principles require the College not to store personal information longer than necessary.

You have the right to access and check what personal information Brisbane Christian College holds about you

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, but older students may seek access themselves.

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.

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.

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

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. Acknowledgement of this disclosure would be in the form of a student signature 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 complain that you believe the school has breached the Australian Privacy Principles, please contact the College Principal in writing. Brisbane Christian College will investigate any complaint within a reasonable time of approx. 30 days, 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. If you feel that the College has not adequately dealt with your complaint, then the complaint may be taken to an External Dispute Resolution scheme or subsequently to the Office of the Australian Information Commissioner.

6. RELATED DOCUMENTS

- GSD-001.1 Breach of Privacy & Complaint Procedure
- GSD-001.2 Information Life Cycle
- Privacy Form 1 – Standard Collection Notice
- Privacy Form 2 – Counselling Disclosure Notice