



The Springfield Anglican College

Privacy Policy

Document Approval and Version Control			
Version:	2.0	Approved by:	<i>Principal</i>
Last amended:	<i>September 2023</i>	Date Approved:	<i>September 2023</i>
Contact Officer:	<i>Risk and Compliance Manager</i>	Next Review Due:	<i>September 2026</i>



1 Policy statement

The Springfield Anglican College (**College**), as part of the Anglican Church Southern Queensland is committed to protecting and managing Personal Information in accordance with the *Privacy Act 1988* (Cth) (**Act**) and the Australian Privacy Principles (**APPs**).

2 Special note

This policy should be read together with the Protecting Children and Young People in Anglican Education Policy, Guidelines and Procedures which deal with matters of harm, sexual abuse or inappropriate behaviour and must be kept at the forefront when considering and implementing the contents of this policy. In the event that reasonable suspicions exist that harm, and/or sexual abuse has occurred or is likely to occur, the Protecting Children and Young People in Anglican Education Policy, Guidelines and Procedures must be followed.

3 Scope

This policy applies to all staff, students, parents, Board and Council members, volunteers, contractors, prospective employees and other individuals involved with the College.

4 Defined terms

- 4.1 **Health Information:** is a subset of Sensitive Information and is any information or an opinion about the health (including disability or injury) of an individual, the individual's expressed wishes about the future provision of health services or a health service provided or to be provided to an individual. Health information also includes personal information collected in the course of providing a health service.
- 4.2 **Personal Information:** is information or an opinion about an identified individual or an individual who is reasonably identifiable whether the information is true or not or whether the information is recorded by the College in any material form or not, regardless of its source.
- 4.3 **Privacy Officer:** Steven Morris – Principal – smorris@tsac.qld.edu.au



4.4 Sensitive Information is a type of personal information and 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 and biometric information.

5 Type of information collected

- 5.1** The type of Personal Information, including Health Information and other Sensitive Information collected by the College depends upon an individual's relationship with the College.
- 5.2** Personal Information collected from students and parents/guardians before, during and after the course of a student's enrolment at the College typically includes (but is not limited to):
- (a) name, contact details (including next of kin), date of birth, gender, language, background, previous school and religion;
 - (b) parent's education, occupation, language spoken at home, nationality and country of birth;
 - (c) health information (e.g. details of disability, allergies, dietary requirements, absence notes, immunisation details, medical reports, names of doctors);
 - (d) results of assignments, tests and examinations;
 - (e) conduct and complaint records or other behaviour notes and College reports;
 - (f) information about referrals to government welfare agencies;
 - (g) counselling reports;
 - (h) health fund details and Medicare number;
 - (i) any Family Court orders;
 - (j) criminal records;
 - (k) volunteering information; and
 - (l) photos and videos at College events.



5.3 Personal Information collected from job applicants, volunteers and contractors, typically includes (but is not limited to):

- (a) name, contact details (including next of kin), date of birth and religion;
- (b) information on job application;
- (c) professional development history;
- (d) salary and payment information, including superannuation details;
- (e) health information (e.g. details of disability, allergies and medical certificates);
- (f) complaint records and investigation reports;
- (g) leave details;
- (h) photos and videos at College events;
- (i) workplace surveillance information; and
- (j) emails and internet browsing history.

5.4 Personal Information collected from other people who come into contact with the College typically includes (but is not limited to) name and contact details and any other information necessary for the particular contact with the College.

5.5 Under the Act, the APPs do not apply to current or former employee records. Employee records are a record of Personal Information relating to the employment of the employee and include records such as the:

- health of the employee;
- engagement, training, disciplining or resignation of the employee;
- termination of the employment of the employee;
- terms and conditions of employment of the employee;
- employee's personal and emergency contact details;
- employee's performance or conduct;
- employee's hours of employment;
- employee's salary or wages;
- employee's membership of a professional or trade association;
- employee's trade union membership;



- employee's annual, long service, personal, parental or other leave; and
- employee's taxation, banking or superannuation affairs.

5.6 The employee records exemption does not apply to prospective employees, contractors, consultants or volunteers.

5.7 Despite the employee records exemption, the College takes reasonable steps to protect employee records so that they are only used for employment related purposes.

6 How information is collected

6.1 The College generally collects Personal Information about an individual directly from the individual (or their parent in the case of a student). This includes by way of forms, face-to-face meetings and interviews, emails, letters, telephone calls and financial transactions.

6.2 The College may collect Personal Information about an individual from a third party. Examples of Personal Information collected from a third party include (but are not limited to):

- (a) a report provided by a medical practitioner;
- (b) Family Court orders;
- (c) a reference from another school;
- (d) a referee for a job applicant; or
- (e) information from another school if a student is transferring from that school to the College.

6.3 The College also collects Personal Information through surveillance activities such as the use of CCTV security cameras, drones or if required, access to email accounts.

6.4 Any Personal Information that is unsolicited will be dealt with in accordance with the APPs.



7 Use of information

- 7.1** The College uses Personal Information collected 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 the individual, or to which the individual has consented.
- 7.2** The purposes will depend upon the College's relationship with the individual and typically includes (but are not limited to) the following:

Students and parents

- (a) providing schooling and school activities;
- (b) satisfying the needs of Parents, the needs of students and the needs of the College throughout the whole period a Student is enrolled at the College;
- (c) making required reports to government authorities
- (d) keeping Parents informed about matters related to their child's schooling, through correspondence, apps, newsletters and magazines (including electronic versions);
- (e) day to day administration of the College;
- (f) supporting a Student's educational, social and health wellbeing;
- (g) seeking donations and/or marketing for the College; and
- (h) satisfying the legal obligations of the College.

Volunteers

- (i) to contact the individual and administer the volunteer position;
- (j) for insurance purposes; and
- (k) satisfying the College's legal obligations.



Job applicants and contractors

- (l) assessing and (if successful) engaging the applicant or contractor;
- (m) administering the individual's employment or contract;
- (n) for insurance purposes; and
- (o) satisfying the College's legal obligations.

7.3 If the College requests an individual to provide personal information and the request is not complied with, the College may be unable to:

- (a) in the case of a student – enrol a prospective student or continue enrolment of a current student;
- (b) in the case of a volunteer – engage the volunteer to work at the College; or
- (c) in the case of a job applicant or contractor – assess and (if successful) engage the job applicant or contractor to work at the College.

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

8 Disclosure of information

8.1 The College may disclose Personal Information, including Sensitive Information, for educational, care and administrative purposes and to seek support and advice. This may include to:

- (a) other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
- (b) government departments;
- (c) medical practitioners;
- (d) persons providing educational, support and health services to the College, including specialist visiting teachers, coaches, volunteers and counsellors;



- (e) providers of specialist advisory services and assistance to the College including in the area of Human Resources, child protection and students with additional needs;
- (f) providers of learning and assessment tools;
- (g) 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);
- (h) agencies and organisations to whom we are required to disclose Personal Information for education, funding and research purposes;
- (i) recipients of College publications, such as newsletters and magazines;
- (j) students' parents;
- (k) the Corporation of Synod of the Diocese of Brisbane for administrative and management purposes including insurance, child protection and professional standards;
- (l) anyone the individual concerned (or in the case of a student their parent) authorises the College to disclose information to; and
- (m) anyone to whom the College is required or authorised to disclose the information to by law, including child protection laws.

9 Management and security of information

- 9.1** College staff are required to respect the confidentiality of all Personal Information collected and the privacy of every individual.
- 9.2** The College stores Personal Information in hard copy and electronically.



- 9.3** The College has in place steps to protect the Personal Information the College 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. These steps include (but are not limited to):
- (a) restricting access to Personal Information on the College databases on a need-to-know basis;
 - (b) ensuring that hard copy records of Personal Information are stored in locked storage either onsite or offsite and restricting access to authorised College employees;
 - (c) ensuring all staff are aware that they are not to reveal or share their passwords;
 - (d) implementing physical security measures around the College buildings and grounds to prevent break-ins (e.g. perimeter fencing and entrance gate, security alarms, CCTV security surveillance);
 - (e) implementing ICT security systems, policies and procedures, to protect Personal Information storage on the College computer network;
 - (f) implementing policies and procedures to ensure staff follow correct protocols when handling Personal Information; and
 - (g) undertaking due diligence with respect to third party service providers who may have access to Personal Information to ensure as far as practicable they are compliant with the APPs.

9.4 The College takes all reasonable steps to securely destroy or de-identify Personal Information that is no longer required.

10 Sending and storing Personal Information overseas

10.1 The College may disclose Personal Information about an individual to overseas recipients in certain circumstances, for example to facilitate a school exchange.



- 10.2** The College will not send Personal Information about an individual outside of Australia, unless such disclosure is required or authorised by law without:
- (a) obtaining the consent of the individual (noting that in some cases this consent will be implied); or
 - (b) otherwise being reasonably satisfied that the recipient complies with the APPs or substantially similar privacy laws and mechanisms exist for the individual to enforce those laws.
- 10.3** 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, 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 and provide technical support. 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.

11 Access to Personal Information

- 11.1** An individual has the right to obtain access to Personal Information which the College holds about them unless an exception applies.
- 11.2** Students will generally be able to request access their Personal Information through their Parents, but older Students may request access themselves.
- 11.3** The College requires that a request to access Personal Information be made in writing to the College's Privacy Officer. No fee is charged by the College for making a request to access Personal Information.
- 11.4** The College will respond to a request to access Personal Information within a reasonable period – usually not exceeding 30 days.



- 11.5** If the College grants the request to access Personal Information, the College will, if it is practical and reasonable to do so, provide access in the manner requested. The College may charge a fee to recover the reasonable costs associated with providing access to the Personal information sought.
- 11.6** If the College refuses a request to access Personal Information the College will give written notice of the reasons for refusal and details on how a complaint about the refusal can be made.
- 11.7** Exceptions to an individual's right to access Personal Information are as follows:
- (a) the College reasonably believes that providing access would pose a serious threat to the life, health or safety of any individual or to public health or safety;
 - (b) giving access would unreasonably impact on the privacy of other individuals;
 - (c) the request for access is frivolous or vexatious;
 - (d) the information relates to existing or anticipated legal proceedings between the parties and the information would not be accessible through discovery;
 - (e) giving access would reveal the intentions of the College in relation to negotiations with the individual in such a way as to prejudice those negotiations;
 - (f) giving access would be unlawful;
 - (g) denying access is required or authorised by or under an Australian law or a court or tribunal order;
 - (h) the College has reason to suspect that unlawful activity or misconduct of a serious nature that relates to its functions or activities has been engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
 - (i) giving access is likely to prejudice enforcement related activities conducted by or on behalf of an enforcement body; and
 - (j) giving access is likely to reveal evaluative information generated with the College in connection with commercially sensitive decision-making processes.



12 Updating and correction of Personal Information

- 12.1** If the College is satisfied that it holds Personal Information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, it will take reasonable steps to update or correct that Personal Information.
- 12.2** An individual has the right to request that Personal Information which the College holds about them is corrected or updated.
- 12.3** Students will generally be able to request a correction or update to their Personal Information through their Parents, but older Students may request a correction or update to their Personal Information themselves.
- 12.4** The College requires that a request to correct or update Personal Information be made in writing to the College's Privacy Officer. No fee is charged by the College for requesting a correction or update to Personal Information.
- 12.5** The College will respond to a request to correct or update Personal Information within a reasonable period – usually not exceeding 30 days.
- 12.6** If the College grants the request to correct or update Personal Information, the College will take such reasonable steps required to correct or update the Personal Information so that the Personal Information is accurate, up-to-date, complete, relevant and not misleading. No fee is charged by the College for correcting or updating Personal Information.
- 12.7** If the College refuses a request to correct or update Personal Information, the College will give written notice of the reasons for refusal and details on how a complaint about the refusal can be made.
- 12.8** If the College corrects Personal Information that it has previously supplied to a third party and a person requests us to notify the third party of the correction, the College will take such steps as are reasonable to give that notification unless impracticable or unlawful to do so.



13 Marketing and fundraising

- 13.1** The College engages in marketing and fundraising as a means to promote future growth and sustain and improve the educational environment for Students.
- 13.2** Personal information collected may be used to make a marketing or fundraising appeal. The College will abide by any direction from an individual not to disclose Personal Information to third parties for marketing purposes.
- 13.3** The College also allows individuals to 'opt out' through the enrolment agreement.

14 Data Breach

- 14.1** A data breach occurs when Personal Information is lost or subjected to unauthorised access, modification, disclosure, misuse or interference.
- 14.2** The way in which the College manages data breaches or suspected data breaches is detailed in the College's Data Breach Procedure & Response Plan.

15 Complaints

- 15.1** If an individual requires further information about the way the College manages Personal Information or believes that the College has breached the APPs, the individual may contact the College's Privacy Officer.
- 15.2** A complaint that the College has breached the APPs should be made in writing and sent to the College's Privacy Officer.
- 15.3** The College will investigate any complaint in a timely manner and respond in writing as soon as practicable.
- 15.4** If an individual is not satisfied with the College's response, a complaint can be lodged with the Office of the Australian Information Commissioner on the following website
<https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>



16 Policy administration

This policy will be reviewed 3 years from the date of the approval shown herein unless circumstances require that an earlier review be conducted.