



Toowoomba
Christian College
EST. 1979

Privacy Policy



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A Christian School in the Liberal Arts Tradition

07 4630 8444 | 10852 New England Hwy, Highfields QLD 4352 | tccollege.qld.edu.au | ABN: 98 296 380 577

1 Your Privacy is important

This Privacy Policy sets out how Toowoomba Christian 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 1988.

The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to College operations and practices and to make sure it remains appropriate to the changing school environment.

2 What kind 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:

- Pupils and parents and/or guardians ('Parents') before, during and after the course of a pupil's enrolment at the College, including:
 - name, contact details (including next of kin), date of birth, previous school and religion
 - medical information (e.g., details of disability and/or allergies, absence notes, medical reports and names of doctors)
 - conduct and complaint records, or other behaviour notes, and school reports
 - information about referrals to government welfare agencies
 - counselling reports
 - health fund details and Medicare number
 - any court orders
 - volunteering information; and
 - photos and videos at School events
- Job applicants, staff members, volunteers and contractors; including:
 - 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, COVID-19 vaccination status)
 - leave details
 - photos and videos at School events
 - work emails and private emails (when using work email address) and Internet browsing history; and
- 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.

3 Personal Information you provide

The College will generally collect personal information about an individual by way of forms filled out by Parents or pupils, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and pupils provide personal information.

4 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.

5 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 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.

6 How will the College use the personal information you provide?

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 COVID-19 Public Health Direction Privacy Statement

The College may collect, hold, use and disclose information about the vaccination status of all workers (including employees, contractors, volunteers), and those applying for work, at the College, to comply with laws and public health directives regarding COVID-19 and its variants, and as reasonably necessary for the College's functions and activities including compliance with legislative and common law work, health and safety, and duty of care obligations.

Toowoomba Christian College will not store or disclose COVID-19 certificates or vaccination records that show Individual Healthcare Identifiers, and the College will either redact Individual Healthcare Identifiers (if any) or securely destroy the document containing Individual Healthcare Identifiers after the contents of the document have been viewed and noted by the College, consistent with the College's obligations under public health directions.

8 Pupils and Parents

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

The purposes for which the College uses personal information of pupils and Parents include:

- To keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines
- Day-to-day administration of the College
- Looking after pupils' educational, social and medical well-being
- 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 the College requests personal information about a pupil or parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the pupil or permit the pupil to take part in a particular activity.

9 Job applicants and contractors

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

The purposes for which the College uses personal information of job applicants 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

10 Volunteers

The 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.

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 the College continues to provide a quality learning environment in which both pupils and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising. Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

If you would like to opt-out of direct marketing, please contact the School Principal, **Mr Richard Brown** on 07 4630 8444,

12 With whom might the College disclose personal information, and store your information?

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

- Other schools and teachers at those schools
- Government departments
- Medical practitioners
- People providing educational, support and health services to the College, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools
- Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority
- People providing administrative and financial services to the College
- Recipients of College publications, like newsletters and magazines
- Pupils' parents or guardians
- Anyone you authorise the College to disclose information to, and
- Anyone to whom we are required or authorized to disclose the information to by law, including child protection laws.

The College does not release credit information to third parties, nor does it receive credit information from Credit Reporting Bodies.

Query – our debt collection policy? How does this fit with releasing credit info to third party?

Excerpt from Debtors Policy

13 ENGAGING DEBT COLLECTION AGENCIES

The school will not generally refer current families to Debt Collection Agencies, unless specified by the School Board or Principal in exceptional circumstances. Past families will be referred as approved by the School Board, and only after all other measures have been exhausted.

Commented [SH1]: Not from ISQ, but from ISCA Privacy Compliance Manual and subsequent phone call to one of their professionals.

14 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 School 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 School 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.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. School personnel and the AIS and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g., instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.

15 How does the College treat sensitive information?

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

16 Management and security of personal information

The College's staff is required to respect the confidentiality of pupils' and Parents' personal information and the privacy of individuals.

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.

17 Data Breaches

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

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (**the affected individuals**)
- 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, and
 - assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals

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

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

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

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then the College will be required to lodge a statement to the Privacy Commissioner (**Commissioner**). Where practical to do so, the school entity will also notify the affected individuals. If it is not practicable to notify the affected individuals, the College will publish a copy of the statement on its website or publicise it in another manner.

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and, as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information, or
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm

18 Access and correction of personal information

Under the Commonwealth Privacy Act an individual has the right to see and obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. Pupils will generally be able to access and update their personal information through their Parents, but older pupils may seek access and correction themselves.

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

To make a request to access or update any personal information the College holds about you or your child, please contact the College Principal 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 School will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

19 Consent and rights of access to the personal information of pupils

The College respects every parent'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 pupil to the pupil's Parents. The College will treat consent given by Parents as consent given on behalf of the pupil, and notice to Parents will act as notice given to the pupil.

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

The College may, at its discretion, on the request of a pupil grant that pupil access to information held by the College about them or allow a pupil 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 pupil and/or the pupil's personal circumstances warrant it.

20 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 Principal in writing. The College will investigate any complaint and will notify you of the making of a decision in relation to your complaint as soon as practicable after it has been made.