



Privacy Policy

Purpose:	Northpine Christian College operating under the Seventh-day Adventist Schools (South Queensland) Limited is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the school and describes how the school uses and manages personal information provided to or collected by it.	
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the school site; and describes the type of information the school collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.	
References:	<ul style="list-style-type: none"> • Australian Privacy Principles • Privacy Act 1988 (Cth) • Privacy Amendment (Enhancing Privacy Protection) Act 2012 • Privacy Compliance Manual April 2023 (Association of Independent Schools) • Child Protection Policy • Disabilities Policy 	
Authorised by:	Principal	Date: 24 May 2023
Review Date:	Annually	Next Review Date: Term 3 - 2024
Policy Owner:	Northpine Christian College operating under the Seventh-day Adventist Schools (South Queensland) Limited	

Exception in Relation to Employee Records

Under the Privacy Act 1988, 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 Northpine Christian 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.

Policy

This Privacy Policy sets out how Northpine Christian College manages personal information provided to or collected by it. Northpine Christian College is bound by the Australian Privacy Principles contained in the Privacy Act.

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

What kinds of personal information does the school collect and how does the school collect it?

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

- **Students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the school**

- o name, contact details (including next of kin), emergency contact, date of birth, country of birth, nationality, gender, language background, previous school, religion, date and place of baptism, whether Aboriginal or Torres Strait, correspondence with parents and absentee notes
- o parents' name, address and phone number, email address, marital status, date of birth, country of birth, nationality, religion, education, occupation, language background, learning disabilities, other children's details
- o medical information (e.g. details of disability and/or allergies, medical reports and names of doctors), immunisation records, medical treatments, medical certificates, accident reports,
- o school reports; information about referrals to government welfare agencies
- o health fund details and Medicare number
- o any court orders
- o photos and videos at school events and on social media
- **Job applicants, staff members, volunteers and contractors:**
 - o name, contact details (including next of kin), date of birth, and religion
 - o information on job application
 - o professional development history
 - o professional qualifications details
 - o teacher registrations and blue card numbers
 - o driver licence details (car and bus)
 - o salary and payment information, including superannuation details
 - o medical information (e.g. details of disability and/or allergies, and medical certificates)
 - o complaint records and investigation reports
 - o leave details
 - o photos and videos at school events
 - o workplace surveillance information
 - o work emails and private emails (when using work email address) and Internet browsing history.
- **Other people who come into contact with the school including name and contact details and any other information necessary for the particular contact with the school, including copies of drivers licence, contractor licenses/registrations, public liability and current workers compensation certificate**

Personal Information you provide:

Northpine Christian College will generally collect personal information held about an individual by way of paper forms and electronic/online forms filled out by parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions, people other than parents and students provide personal information.

Personal Information provided by other people:

In some circumstances, Northpine Christian 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.

How will the school use the personal information you provide?

Northpine 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 by you, or to which you have consented. The primary purpose of collecting personal information is to enable the College to use the information for all

actions connected with education our students.

Students and Parents

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

The purposes for which Northpine 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 of the school
- looking after student's educational, social and medical wellbeing
- to satisfy the school's legal obligations and allow the school to discharge its duty of care.

In some cases where the college requests personal information about a student or parent, 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 school 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 school will obtain permissions [annually] from the student's parent or guardian (and from the student if appropriate) if we would like 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.

Job applicants, Staff Members and Contractors

In relation to personal information of job applicants, staff members and contractors, Northpine 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 the school 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
- to satisfy the school's legal obligations, for example, in relation to child protection legislation.

Volunteers

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

Marketing and Fundraising

Northpine Christian College treats marketing for the future growth and development of the school as an important part of ensuring that the school continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the school may be disclosed to organisations that assist in the school's fundraising, for example, the college's Parents and Friends Association, with permission from parents and guardians.

Parents, staff, contractors and other members of the wider School community may from time to time receive fundraising information. School publications, like newsletters and magazines, which include personal information, may be used for marketing purposes.

Who might the school disclose Personal Information to?

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

- another school
- government departments (including for policy and funding purposes)
- medical practitioners
- people providing educational, support and health services to the school, 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) 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 school
- recipients of School publications such as newsletters and magazines
- parents or guardians of Northpine students
- anyone you authorise the college to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Sending Information Overseas

Northpine 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, 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
- notifying when overseas cloud services are used and giving details of which country and what information is stored,
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Sensitive Information

In referring to 'sensitive information', Northpine Christian 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 required by law.

Management and Security of Personal Information

Northpine Christian College's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. The school has in place steps to protect the personal information the school 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.

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:
 - o unauthorised access to, or unauthorised disclosure of, the information is likely to occur

- o 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 Northpine Christian 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 school 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
- 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.

Access and Correction of Personal Information

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

To make a request to access or update any personal information Northpine Christian College holds about you or your child, please contact the school in writing. The school may require you to verify your identity and specify what information you require. The school 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, Northpine Christian 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.

Consent and Rights of Access to the Personal Information of Students

Northpine Christian 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 student to the student's parents or guardians. The school will treat consent given by parents/guardians as consent given on behalf of the student, and notice to parents/guardians will act as notice given to the student.

As mentioned above, parents/guardians may seek access to personal information held by the school about them or their child by contacting the school 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 school's duty of care to a student.

The school may, at its discretion, on the request of a student grant that student access to information held by the school 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.

Enquiries and Complaints

If you would like further information about the way Northpine Christian College manages the personal information it holds or wish to make a complain about the school's breach of the Australian Privacy Principles, please contact the school Principal. The school will investigate any complaint 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.

APPENDIX 1

Standard Collection Notice

1. The school collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the school. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the school to provide schooling to students and to enable students to take part in all the activities of the school.
2. Some of the information we collect is to satisfy the school's legal obligations, particularly to enable the school 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 school from time to time discloses personal and sensitive information to others for administrative and educational purposes, including to facilitate the transfer of a pupil to another school. This includes to other schools, government departments, [Seventh-day Adventist Schools (South Queensland) Ltd, and the school's local Conference, other Conferences, Schools within other Conferences]* medical practitioners, and people providing services to the school, 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 school may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia **
8. The School's Privacy Policy sets out how parents or pupils 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 school's duty of care to the student, or where students have provided information in confidence.
9. The School's Privacy Policy also sets out how you may complain about a breach of privacy and how the school will deal with such a complaint.
10. As you may know the school 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 school'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 School 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 school will obtain permissions [annually] from the student's parent or guardian prior to publication.
12. We may seek specific permission to include students' and students' parents' contact details in a class list and School directory. †
13. If you provide the School 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 School and why, that they can access that information if they wish and that the School does not usually disclose this information to the third parties.

* *As appropriate*

** *If applicable*

† *Schools may wish to seek specific consent to publish contact details in class lists and School directories*

APPENDIX 2

Alumni Association Collection Notice

1. [The Alumni Association/We] 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 Northpine Christian 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 [the Alumni Association].
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 Northpine Christian College to assist in its fundraising activities.] [If you do not agree to this, please advise us now.]
4. [The Alumni Association/We] may publish details about you in our school magazine [and our/the school's website]. If you do not agree to this, you must advise us now.
5. The School's Privacy Policy contains details of how you may seek access to personal information collected about you or how you may complain about a breach of the APPs.
6. The school may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.*
7. If you provide us personal information to us about others, we encourage you to inform them of the above matters.

** If applicable, see School Privacy Policy*

APPENDIX 3

Employment Collection Notice

1. In applying for this position, you will be providing Northpine Christian College with personal information. We can be contacted 29 Hughes Road East, Dakabin or office@northpine.qld.edu.au; Ph: (07) 3204 6511.
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 School's Privacy Policy contains details of how you may complain about a breach of the APPs or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
4. We will not disclose this information to a third party without your consent unless otherwise permitted. We usually disclose this kind of information to the following types of organisations [insert list e.g. support vendors that provide services around staff administration systems].
5. [We are required to [conduct a criminal record check] 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 school may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
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 school and why, that they can access that information if they wish and that the school does not usually disclose the information to third parties*

** If applicable, see School Privacy Policy.*

APPENDIX 4

Contractor/Volunteer Collection Notice

1. In applying or agreeing to provide services to the school, you will be providing Northpine Christian College with personal information. We can be contacted 29 Hughes Road East, Dakabin or office@northpine.qld.edu.au; Ph: (07) 3204 6511.
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 [insert amount of time].
4. The School's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the APPs.
5. We will not disclose this information to a third party without your consent unless otherwise permitted to. / We usually disclose this kind of information to the following types of organisations [insert list e.g. support vendors that provide services around administration systems].
6. [We are required to [conduct a criminal record check] 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. *]
7. The school may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia. *
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the school and why, that they can access that information if they wish and that the school does not usually disclose the information to third parties.

** If applicable, See School Privacy Policy*