



Saint Stephen's College

CRICOS Provider Number 01938G

# PRIVACY POLICY

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## 1. Purpose

Saint Stephen's College (the College) collects, uses and discloses and holds personal information for the primary purpose of providing educational services and long daycare centre services. The College also collects, uses, discloses and holds personal information to carry out certain business functions, such as assessing suitable candidates for career opportunities within the College.

The policy observes the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth), including amendments introduced by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, the *Privacy Amendment (Notifiable Data Breaches) Act 2017* and the *Privacy and Other Legislation Amendment Act 2024* (Cth) (together referred to as "the Privacy Act"). In relation to health information, the College manages records in accordance with the Australian Privacy Principles, as there is no separate health records legislation in Queensland for private sector entities.

The College is committed to complying with the Act in relation to all personal information it collects. This commitment is demonstrated in this Policy. The Act incorporates the Australian Privacy Principles. The Australian Privacy Principles set out the way in which personal information must be treated. Personal information held by the College will be treated in accordance with the Australian Privacy Principles.

This policy is designed to be published on the College's public website, referenced in other mediums as appropriate, and used in the ongoing training of College Board members, staff, volunteers, contractors and third party and educational service providers.

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, practices and to make sure it remains appropriate to the College's authorising environment as it may change from time to time.

## 2. Scope

This Policy applies to the management of personal information collected at the College in the course of College operations, including that which is collected by solicited and unsolicited means, and is applicable to the management of any personal information which is held by the College.

### Australian Privacy Principles

- APP 1: Open and transparent management of personal information
- APP 2: Anonymity and pseudonymity
- APP 3: Collection of solicited personal information
- APP 4: Dealing with unsolicited personal information
- APP 5: Notification of the collection of personal information
- APP 6: Use or disclosure of personal information
- APP 7: Direct marketing
- APP 8: Cross-border disclosure of personal information
- APP 9: Adoption, use or disclosure of government related identifiers
- APP 10: Quality of personal information
- APP 11: Security of personal information
- APP 12: Access to personal information
- APP 13: Correction of personal information

This policy applies to the College environment, virtual environments and other locations provided by the College and to all College employees board members, students, parents and carers, third party service providers, educational service providers, volunteers and contractors in connection with the College environment or College activities.

This policy is not applicable to information which is under the control of any third party to which the College provides personal information in accordance with this policy, except where the College has the right or power to deal with the information in the hands of the third party (for example, some technology service providers).

Under the *Privacy Act 1988* (Cth), the Australian Privacy Principles (APPs) there is **an exception in relation to Employee Records**. The *Privacy Act 1988* (Cth), the Australian Privacy Principles (APPs) 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. In these circumstances, the College complies with other applicable laws, including the *Fair Work Act 2009* (Cth) and its regulations. The College handles staff health records in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth), and relevant obligations under Queensland law.

### 3. Policy Principles

#### 3.1. What kind of personal information does the College collect?

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

- students before, during and after the course of a student's enrolment at the College or Early Learning Centre:
  - name, contact details (including next of kin), date of birth, gender, language background, 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;
  - information obtained during counselling;
  - passport and visa information;
  - any court orders and parenting plans;
  - photos and videos at College events including footage from any security systems located at the College;
  - student emails and private emails (when using College issued email address) and internet browsing history.
- parents, carers and students' families before, during and after the course of a student's enrolment at the College or Early Learning Centre:
  - name, address and contact details
  - education, occupation and language background
  - health fund details and Medicare number
  - financial and business information
  - credit information in relation to payment plans, deferred terms of payment, scholarships and/or bursaries
  - any court orders, parenting plans or other parenting and access arrangements
  - volunteering information (including Working with Children Checks)

- photos and videos at College events and on College premises including footage from any security systems located at the College.
- job applicants, staff members, volunteers and contractors:
  - name, contact details (including next of kin), date of birth, and religion;
  - information on job application;
  - skills and qualifications;
  - 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 College events;
  - workplace surveillance information;
  - work emails and private emails (when using work email address) and internet browsing history;
  - sensitive information such as health information, criminal history, membership of professional or trade associations and membership of trade unions;
  - blue card application status.
- Staff of College suppliers:
  - name and contact details
  - position held
- 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.

### **3.2. How does the College collect personal information?**

#### **3.2.1. Personal information provided**

The College will generally collect personal information through a number of ways, including but not limited to:

- forms filled out by staff, students, parents or carers;
- in-person and over the phone, including interviews;
- interactions between College staff and students, for example in classroom and other learning environments;
- electronic means including emails and telephone calls;
- through College portals and other digital platforms;
- consent forms;
- written communication to the College;
- photographs, videos and recordings taken by or supplied to the College, including through any CCTV cameras located at the College;
- in some circumstances, through authorised information sharing arrangements with other services.

#### **3.2.2. Indirect collection of personal and sensitive information**

The College may collect personal information including sensitive information, indirectly from publicly available sources or from third parties such as:

- an authorised representative; or
- medical professional or allied health service provider; or
- other schools or Early Learning Centres; or

- enrolment or job applicants, complainants, respondents to a complaint, investigation, incident or data breach notification; or
- government agencies and regulatory bodies, including those related to child protection or work, health and safety.

The College would ordinarily collect personal information in this way, for example, when the College handles a complaint, incident, data breach notification, review or investigation.

### **3.2.3. Unsolicited Information**

From time to time, the College may receive personal information without having actively sought the information, such as misdirected emails. The College will only retain such information if it could have been collected in the usual way. Otherwise, the information will be securely destroyed or de-identified in line with the Australian Privacy Principles.

### **3.2.4. Device Information**

When visiting any of the College's digital platforms, the College may collect information about a device and activity. This includes IP addresses, login information, browser type and version, time zone setting, operating system and platform, and the type of device.

### **3.2.5. Online Information**

- Website

The College's web server will keep a record of all visits to the College website and may log information on users' online experience for statistical purposes only. Information collected does not identify individual users, but does identify the computer used to access the site, including:

- Visitor server IP addresses and domain names;
- The times and dates the site was visited;
- The pages accessed and files downloaded; and
- Visitors' browsers and operating systems.

In the event of an investigation, a law enforcement or government agency may exercise its legal authority to have access to the College's web server logs.

- Cookies

The College website may use cookies, which are small text files that are generated by the College web server and stored onto the user's computer, to allow recognition of returning users and to register preferences.

A cookie is sent from the Cookie web server and automatically placed on the user's computer without notification. Personal preferences or information may be stored in the cookie, which is then sent back to the server on completion of the session. Cookies may be turned off within the user's browser. However, this may make some sections of the College website unusable.

### **3.2.6. Anonymity**

Individuals may interact with the College anonymously or under a pseudonym where it is lawful and practicable to do so. For example, where contact is made over the phone via College Reception with a general enquiry, a name may not need to be provided unless it is necessary to appropriately respond to the request.

However, in most interactions with the College, it will be necessary to collect the name of the person making an enquiry, contact details, and sufficient information relevant to the matter to ensure it is managed fairly and efficiently.

Please note that anonymity is not possible during the student enrolment process or throughout a student's engagement with the College following successful enrolment.

#### **4. How will the College use personal information?**

##### **4.1. Students, parents and carers**

The College will generally use personal information it collects for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection (or in the case of sensitive information, directly related to the primary purpose of collection) and reasonably expected by the relevant individual. The College will otherwise use personal information where it has received the consent of the individual, where it is required or authorised by law, or otherwise in accordance with the *Privacy Act*.

In relation to the personal information of students, parents and carers, the primary purposes for which the College collects personal information are generally to provide schooling to students enrolled at the College (including educational and support services for the student), exercise its duty of care and perform necessary associated administration activities which will enable students to take part in the activities of the College. This includes satisfying the needs of parents and carers, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College and in some cases, before or after the time of their enrolment.

In particular, the purposes for which the College collects and uses the personal information of students, parents and carers include but are not limited to:

- enrol a student either at the Early Learning Centre or the Prep to Year 12 campus;
- after enrolment, providing education and any associated functions relating to the education of the student;
- providing for, protecting and accommodating a students' health and wellbeing including educational, social, emotional and medical wellbeing;
- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of the College;
- process job applications;
- carry out analytics, business improvement and reporting.
- seeking donations and marketing for the College;
- satisfying the College's administrative and regulatory requirements, including those of the Queensland Department of Education (Non-State Schools Accreditation Board), the Queensland Curriculum and Assessment Authority, the Queensland College of Teachers, and any other relevant statutory oversight bodies; 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, 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.

##### **4.2. Achievements, work samples, photographs and images of students**

On occasions information such as academic and sporting achievements, work samples, student activities and similar news are used internally or published in College newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such

as sporting events, College camps and College excursions and the College will obtain annual consent.

Where students' images are prominently featured, the College will seek separate specific consent from affected students' parents or carers prior to each publication of promotional material for the College, or otherwise, where the College are making it available to the public such as on the Internet, including through social media.

### **4.3. 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;
  - providing, as far as practicable, a safe workplace, including in relation to questions of fitness for duty, making adjustments for workers with disabilities, and discharging occupational health and safety and duty of care obligations to others
  - for insurance purposes;
- seeking donations and marketing for the College; and
- to satisfy the College's legal obligations, for example, in relation to its commitment to provide child safe environments.

### **4.4. Volunteers**

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as Parents and Friends, Friends of the Arts (FOTA) or Old Scholar Associations, to enable the College and the volunteers to work together.

This information is collected to assess volunteer suitability, contact volunteers, and to administer the volunteer position, as well as for insurance purposes and to satisfy the College's legal obligations, for example, in relation to its commitment to provide child safe environments.

### **4.5. Counsellors**

The College contracts or employs internal counsellors and/or external providers to provide counselling and/or psychology services for some students. The Principal may require the Counsellor and/or Psychologist to inform him or her or other staff of any issues the Principal or the Counsellor and/or Psychologist believe may be necessary for the College to know for the safety, wellbeing or development of the student who is counselled or other students at the College.

### **4.6. 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 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 College's Parents and Friends Association.

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 opt-out of direct marketing please contact the Marketing Team ([marketing@ssc.qld.edu.au](mailto:marketing@ssc.qld.edu.au)).

#### **4.7. Disclosure Exception**

In certain circumstances, such as a declared emergency or disaster situation, the College may be authorised by law to collect, use, or disclose personal information in ways that would not ordinarily be permitted under the Australian Privacy Principles. Such disclosures will only occur where an official declaration has been made by the Australian Government or relevant authority and where the disclosure is reasonably necessary to respond to the emergency.

### **5. Who might the College disclose personal information to and why?**

#### **5.1. Individuals' information**

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

- people providing educational support, such as specialist visiting teachers and supervisors, placement teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools;
- organisations and persons who support the College by providing consultative services or undertaking assessments for the purpose of educational programming or providers of health services such as counsellors, psychologists, College health services, or dental vans. Specific consent is obtained (except where otherwise required or permitted by law) to collect and disclose sensitive information, such as health information, as part of a service request which may include release of relevant medical or allied health reports and educational planning and evaluation documents such as personalised learning/behaviour/medical management
- another school or staff at another school;
- government departments (including for policy and funding purposes);
- medical practitioners;
- organisations that assist the College with fundraising including the Parents and Friends Association and Friends of the Arts (FOTA);
- assessment and educational authorities, including the Australian and/or Queensland governments, 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 College;
- people providing records management and storage and other information technology services;
- recipients of College electronic and print publications, such as newsletters and magazines;
- students' parents or caregivers;
- debt collection agencies engaged by the College, if payment obligations are not met;
- anyone specifically authorised for the College to disclose information to; and
- anyone to whom the College are required or authorised to disclose the information to by law, including child protection laws.

The College recognises the importance of safeguarding personal information and respecting the privacy of individuals. A statutory tort for serious invasion of privacy under the *Privacy and Other Legislation Amendment Act 2024* (Cth) has commenced and the College is committed to ensuring that personal information is collected, used, stored, and disclosed in a lawful and respectful manner. This includes taking reasonable steps to prevent unauthorised access, misuse, or disclosure of

personal information that could constitute a serious breach of privacy. The College will continue to monitor legislative developments and update its privacy practices accordingly.

### **5.2. Sending and Storing Information Overseas**

The College may disclose personal information to service providers or partners located outside Australia, including for administrative, technological, or educational purposes including facilitating a school exchange or a student overseas tour. In doing so, the College takes reasonable steps to ensure that any overseas recipient handles the information in accordance with the Australian Privacy Principles (APPs), as required by APP 8. However, the College will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual; or
- otherwise complying with the Australian Privacy Principles or other privacy legislation.

The College may from time to time use the services of third-party online service providers which may be accessible by parents. Some personal information, including sensitive information, may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.

The College makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed and stored outside Australia, in connection with any third-party services and where practical will endeavour to ensure personal information controlled by the College is located in countries with substantially similar protections as the Australian Privacy Principles.

The Australian Government now has the authority to maintain a whitelist of overseas jurisdictions that are deemed to have privacy protections substantially similar to those under Australian law. Where personal information is disclosed to a recipient in a whitelisted jurisdiction, the College may rely on this status to satisfy its obligations under APP 8.1. Until such a whitelist is formally established and published, the College will continue to assess overseas disclosures on a case-by-case basis to ensure appropriate safeguards are in place.

### **5.3. 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 preferences or practices or criminal record, that is also personal information; health information about an individual; and biometric information that is used for the purpose of automated biometric verification or identification, or biometric templates.

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

### **5.4. Quality of personal information**

The College will take reasonable steps to ensure the quality of personal information obtained, including at the time of first collection and at the point of time the information is used or disclosed. To ensure that the personal information collected by the College is accurate, up-to-date and complete, the College records information in a consistent format and promptly adds updated or new personal information to existing records.

Where a parent, carer, alumni, employee or third party engaged by the College has changed personal information or otherwise believes the information held by the College may be inaccurate, updated

information can be provided to the College through the relevant digital platform or other reasonable means of communications.

### **5.5. Access and Correction of Personal Information**

Under the *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. Students will generally be able to access and update their personal information through their parents, but older students 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, please contact the Privacy Officer via [privacyofficer@ssc.qld.edu.au](mailto:privacyofficer@ssc.qld.edu.au). The College may require identity verification and specific information about the request. The College will respond to a request within 30 days. The College may charge a fee to cover the cost of searching for, locating, retrieving, reproducing and sending any material requested. If a charge will be imposed the College will advise the likely cost in advance. If the College cannot provide access to the requested information, the College will provide a written notice explaining the reasons for refusal within the same 30-day period.

The College will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

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

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 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.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the Privacy Officer. However, there will be occasions when access is denied. Such occasions could include:

- that the College reasonably believes that giving access would pose a serious threat to the life, health or safety of an individual, or to public health or public safety
- giving access would have an unreasonable impact on the privacy of other individuals
- the request for access is frivolous or vexatious
- the information relates to existing or anticipated legal proceedings between the College and the individual, and would not be accessible by the process of discovery in those proceedings
- 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
- giving access would be unlawful
- denying access is required or authorised by or under an Australian law or a court/tribunal order
- the organisation has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the College's functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body
- giving access would reveal evaluative information generated within the College in connection with a commercially sensitive decision-making process.

The 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 warranted it.

#### **5.7. Management and Security of Personal Information**

The College takes reasonable steps to protect the personal information it holds from misuse, interference, loss and unauthorised access, modification or disclosure.

The College recommends that all individuals, including parents and caregivers and the College community, adopt secure practices to protect themselves. It is recommended that all passwords are strong and regularly updated and that log-in details are kept secure. Personal information should not be shared with another party without first verifying their identity and organisation. Where personal information has been compromised, please contact the College immediately.

The College has in place steps to protect the personal information the College holds from:

- misuse, interference and loss; and
- from unauthorised access, modification or disclosure

by use of various methods including locked storage of paper records and password access rights to computerised records.

It is a criminal offence under Australian law to publicly share an individual's personal information with the intent to cause harm, distress, or harassment — commonly referred to as "doxxing." The College does not tolerate this behaviour and takes all reasonable steps to prevent the unauthorised disclosure of personal information, in line with the Australian Privacy Principles and applicable legislation.

If the College no longer needs to hold personal information about an individual for any purpose it was collected, and it is not part of a Commonwealth record and the College is not required by or under an Australian law, or court/tribunal order to retain the information, the College will take reasonable steps to destroy or de-identify the personal information.

#### **5.8. Privacy Officer**

The responsibilities of the Privacy Officer include:

- ongoing review of the College's practices and procedures to ensure that the College complies with this Privacy Policy, current legislation and best practice;
- reviewing this Privacy Policy and advising and educating the Principal, College Leadership and College Board as well as other staff of their responsibilities under this Policy;
- the receipt of requests for information held under privacy legislation;
- the receipt and investigation of complaints relating to breaches of privacy; and
- the receipt and management of complaints received under this policy.

#### **5.9. Complaints**

If any individual wishes to complain that the College has interfered with their privacy because of an alleged breach of the Australian Privacy Principles, they should contact the College's Privacy Officer in writing at:

Privacy Officer  
Risk and Compliance

Saint Stephen's College  
PO Box 441  
Oxenford QLD 4210

OR

[privacyofficer@ssc.qld.edu.au](mailto:privacyofficer@ssc.qld.edu.au)

The College will investigate the complaint in accordance with the College's Complaints Resolution Procedure. If the individual is not satisfied with the College's decision, they may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are:

GPO Box 5288,  
Sydney, NSW 2001  
Telephone: 1300 363 992

Certain incidents might be covered by the College's **Whistleblower Policy**. The Principal is responsible for ensuring that material breaches of this Policy and underlying policies, guidelines and procedures are dealt with as soon as possible.

**A breach of this Policy by a staff member or contractor may lead to disciplinary action** including possible termination of employment or appointment and/or referral to the appropriate authorities.

#### **5.10. Access to the Privacy Policy**

Access to the College's Privacy Policy will be made available on the College website and intranet for staff and students. If a person would prefer the Privacy Policy in a particular form, a request can be made in writing to the Privacy Officer (details included above under the Enquiries and Complaints section).

### **6. Notifiable Data Breaches**

#### **6.1. Eligible data breach**

Under APP 11 (security of personal information), schools are required to take reasonable technical and organisational measures to protect information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. These steps include but are not limited to staff training, password protocols and two factor authentication. The Notifiable Data Breach Scheme will require schools to notify the Office of the Australian Information Commissioner (OAIC) and the affected individual(s), in the event of a notifiable data breach.

The Office of the Australian Information Commissioner (OAIC) has regulatory powers under the *Privacy Act 1988* (Cth) to issue infringement notices, compliance notices, or directions where it identifies a failure to comply with privacy obligations. In cases of serious or repeated non-compliance, civil penalties may apply. The College takes its privacy responsibilities seriously and implements appropriate systems and safeguards to ensure ongoing compliance with the Australian Privacy Principles.

A data breach occurs when personal information is lost or subject to unauthorised access, modification, disclosure, or other misuse or interference.

Pursuant to section 26WE of the *Privacy Amendment (Notifiable Data Breaches) Act 2017*, an eligible data breach, which would require notification, occurs in circumstances where:

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 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.

### **6.2. Response of the College 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 using the Data Breach Response Plan.

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.

### **6.3. 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.

## **7. Source of Obligation**

*Privacy Act 1988 (Cth)*

*Australian Privacy Principles (Cth)*

*Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)*

*Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)*

*Privacy and Other Legislation Amendment Act 2024 (Cth)*

*Telecommunications (Interception and Access) Act 1979 (Cth)*

## **8. Related Policies and Procedures**

Saint Stephen's College Staff Code of Conduct

Saint Stephen's College Parent Code of Conduct

Saint Stephen's College Child Protection Policy

Saint Stephen's College Complaint Resolution Policy and Procedure  
 Saint Stephen's College Cyber Security Policy  
 Saint Stephen's College Risk Management Framework  
 Saint Stephen's College Student Disability Discrimination Policy and Procedure  
 Saint Stephen's College Whistleblower Policy

## 9. References

Office of the Australian Information Commission (OAIC) Guide to developing an APP privacy policy

## 10. Document Administration

Status	Delegated Policy Owner	Approver	Approval Date	Version Number	Last Reviewed	Review Frequency	Next Review Date
Approved	College Principal	College Board	13 August 2025	V2.0	August 2022	Annually	August 2026
Approved	College Board	College Board	August 2022	V1.2	2018	Triennially	August 2025
Approved	College Board	College Board	2018	V1.1	Not applicable	Triennially	2022

## Appendix One Standard Collection Notice

1. The College collects personal information, including sensitive information about students and parents or caregivers 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 primary purpose of collecting this information is to enable the College to provide schooling to students enrolled at the College (including the Early Learning Centre), exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable students 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.
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 College may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
  - other schools and teachers at those schools;
  - government departments (including for policy and funding purposes);
  - medical practitioners;
  - people providing educational, support and health services to the College, including specialist visiting teachers, sports coaches, music tutors, volunteers, and counsellors;
  - 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 College;
  - anyone you authorise the College to disclose information to; and
  - anyone to whom the College is required or authorised by law, including child protection laws, to disclose the information.
6. Personal information collected from students is regularly disclosed to their parents or caregivers.
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 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 reside on a cloud service provider's servers 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.
8. The College's Privacy Policy, accessible on the College's website, sets out how parents or students may seek access to and correction of their 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, where access may result in a breach of the College's duty of care to a student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
9. The College's Privacy Policy also sets out how parents and students can make a complaint about a breach of the APPs and how the complaint will be handled.
10. The College may engage 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 our College newsletter, on our intranet, and on our website and associated social media pages. This may include photographs and videos of student activities such as sporting events, College camps and College excursions. The College will obtain permissions annually from the student's parent or caregiver (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.



12. We may include students' and students' parents' contact details in a class list and College directory.
13. 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.

## **Appendix Two Old Scholars Collection Notice**

1. 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 Saint Stephen's College Limited 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 Saint Stephen's College Limited to assist in its fundraising activities. If you do not agree to this, please advise us now.
4. We may publish details about you in our [name of publication] [and our/the College's website]. If you do not agree to this, you must advise us now.
5. The College's Privacy Policy, accessible on the College's website, contains details of how you may seek access to and correction of your personal information which the College has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
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 servers 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. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.

## Appendix Three Employment Collection Notice

1. In applying for this position, you will be providing Saint Stephen's College Limited with personal information. We can be contacted at 31 Reserve Road, Upper Coomera, QLD, 4209, 07 5573 8600 or [info@ssc.qld.edu.au](mailto:info@ssc.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, accessible on the College's website, contains details of how you may complain about a breach of the Australian Privacy Principles and 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.
4. We will not disclose this information to a third party without your consent unless otherwise permitted. The College usually disclose this kind of information to the following types of organisations such as Microsoft, Employment Hero, SinePro, MaintainX and other administration systems.
5. We are required to validate and/or link your blue card or Queensland College of Teachers (QCT) registration as per our obligations under the College's Child Risk Management Strategy. We may also collect other personal information about you in accordance with Child Protection legislation.
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 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.
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 College and why.

## Appendix Four Contractor / Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the College, you will be providing Saint Stephen's College Limited with personal information. We can be contacted at 31 Reserve Road, Upper Coomera, QLD, 4209, 07 5573 8600 or [info@ssc.qld.edu.au](mailto:info@ssc.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. 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 90 days after your engagement ends.
4. The College's Privacy Policy, accessible on the College's website, contains details of how you may complain about a breach of the Australian Privacy Principles and 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. We will not disclose this information to a third party without your consent unless otherwise permitted to. The College usually disclose this kind of information to the following types of organisations such as Employment Hero, SinePro, MaintainX and other administration systems.
6. We are required to validate and/or link your blue card as per our obligations under the College's Child Risk Management Strategy. We may also collect other personal information about you in accordance with Child Protection legislation.
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 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 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. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.



# Saint Stephen's College

CRICOS Provider Number 01938G

*Developing character, inspiring hope*

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