



Privacy Policy

Privacy Statement

Saint Stephen's College (the College) is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. The College collects personal and sensitive information from you for the primary purpose of providing educational services. All information collected by Saint Stephen's College is treated as confidential and is stored in a secure location. The information collected may be passed onto another association or organisation, a government department; a medical practitioner; and/or anyone you authorise the College to disclose information to. You may access personal information held about you by contacting the Assistant to the Headmaster - Administration and Compliance in writing.

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 and practices and to make sure it remains appropriate to the changing College environment.

Scope

The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the College site. It describes the type of information the College collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.

References

Privacy Act 1988 (Cth)
Privacy Amendment (Enhancing Privacy Protection) Act 2012
Child Protection Policy
Disability Policy

Personal Information Collection and how it is Collected

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;
- job applicants, staff members, volunteers and contractors; and
- other people who come into contact with the College.

Exception in Relation to Employee Records:

Under the *Privacy Act 1988* (Cth), 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 the College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Saint Stephen's College and employee.

Personal Information you provide

The College will generally collect personal information held 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.



Developing character, inspiring hope

The type of information the College 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:
 - name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
 - parents' education, occupation and language background;
 - 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:
 - 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);
 - complaint records and investigation reports;
 - leave details;
 - photos and videos at school events;
 - workplace surveillance information;
 - 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.

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 College.

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 an educational program for the pupil. 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; 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 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.

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.

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;
- 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.

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 or old scholar associations, to enable the College and the volunteers to work together.

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, 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. If you would like to opt-out of direct marketing please contact Jane Howe by email (jhowe@ssc.qld.edu.au).

Disclosure of Personal Information

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

- another College;
- government departments;
- medical practitioners;
- people providing services to the College, including specialist visiting teachers, counsellors and sports coaches;
- recipients of College electronic and print publications, such as newsletters and magazines;
- parents or guardians;
- anyone you authorise the College to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

Sending Information Overseas

The College may disclose personal information about an individual to overseas recipients, for instance, when storing personal information with Microsoft 'cloud' services which are situated outside Australia or to facilitate a College exchange; however, the College will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

How the College treats Sensitive Information

In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, and health information about an individual.

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

Management and Security of Personal Information

The College's staff are 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.

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
 - 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.

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.

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 it in another reasonable manner. The Data Breach Executive is Bob Nicol (bnicol@ssc.qld.edu.au).

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 authorised 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 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 and/or your child, please contact the Assistant to the Headmaster Administration and Compliance, Bob Nicol (bnicol@ssc.qld.edu.au) 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 College 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 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.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the Assistant to the Headmaster - Administration and Compliance; 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 warranted it.

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 Assistant to the Headmaster - Administration and Compliance. (bnicol@ssc.qld.edu.au) The College 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.

Policy Review

This policy will be reviewed every two years.
Last review February 2020.



Standard Collection Notice

1. Saint Stephen's College (the College) is bound by the National Privacy Principles contained in the Commonwealth Privacy Act. The College collects personal information, including sensitive information about children and parents or guardians before and during the course of a child'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 School to provide schooling to students enrolled at the school, 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 and regulations governing or relating to the operation of the College require certain information to be collected and disclosed. These include relevant Education and Accreditation Acts, and Public Health and Child Protection laws;
4. Health information about children is sensitive information within the terms of the Australian Privacy Principles under the Privacy Act. We may ask you to provide medical reports about your child from time to time;
5. The College from time to time discloses personal and sensitive information to others for administrative and educational purposes, including facilitating the transfer of a child to another school. This also includes government departments, medical practitioners, and people providing services to the College, including specialist visiting teachers, coaches, tutors, advisors, volunteers and counsellors;
6. Personal information collected from children is regularly disclosed to their parents or guardians;
7. 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 reside on a cloud service provider's servers which may be situated outside Australia. The College makes every reasonable attempt to ensure these services comply with the Privacy Principles in the Act;
8. The College's Privacy Policy, located on the College website, sets out how parents or children 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 College's duty of care to the child, or where the child has provided information in confidence;
9. The College's Privacy Policy also sets out how you may complain about a breach of privacy and how the College will deal with such a complaint;
10. The College, from time to time, engages in fundraising activities. Information received from you may be used to make an appeal to you. We will not disclose your personal information to third parties for their own marketing purposes without your consent;
11. On occasions information such as achievements, activities and news is published electronically and in print on campus, newsletters, and magazines and on our website. Photographs of children in activities and excursions may be taken for publication in classwork, newsletters, magazines and on our website;
12. We may include parents' contact details in a class list and directory after obtaining specific permission;
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, that they can access that information if they wish and that the College does not usually disclose this information to third parties.



Developing character, inspiring hope