



Saint Stephen's College

CRICOS Provider Number 01938G

# PRIVACY POLICY

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# 1. Introduction

Saint Stephen's College (ABN: 31 071 134 024) (the College) collects, uses, discloses and manages personal information for the primary purpose of providing educational services and long daycare centre services. The College also collects, uses, discloses and manages personal information to carry out certain business functions, such as assessing suitable candidates for career opportunities within the College. The specific functions and activities can include:

- Generating statistical data and reports for policy and funding purposes;
- Organising and managing events/functions;
- For insurance purposes, internal accounting and administration;
- For publications such as magazines and newsletters, including publication of that material (both physically and online);
- Seeking donations and marketing for the College;
- Enabling the College to comply with reporting requirements;
- Reporting to educational and Government authorities.

## 2. Purpose

The purpose of this Privacy Policy is to explain how Saint Stephen's College collects, uses, discloses, manages and protects personal information in accordance with 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.

## 3. Scope

This policy applies to students, parents and/or guardians, job applicants, alumni, volunteers, homestay providers, contractors, third party providers, visitors, website users and other people with whom the College ordinarily interacts.

This policy does not apply to employees or employee records, as the handling of employee records by a private sector employer is exempt from the *Privacy Act* if it is directly related to the employee's current or former employment relationship. However, if you do have questions regarding the handling of your employee records, you can contact our Privacy Officer on the details below for assistance.

## 4. Policy Principles

Saint Stephen's College is committed to complying with the *Privacy Act 1988* (Cth), including the Australian Privacy Principles.

### 4.1. What personal information is collected and held?

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

#### **4.1.1 Students**

Students before, during and after the course of a student's enrolment at the College or Early Learning Centre:

- full name, contact details (including next of kin and emergency contacts), date of birth, gender, nationality, language background and previous school
- conduct and complaint records, or other behaviour notes, and school reports (including attendance and engagement)
- information about referrals to government welfare agencies
- immunisation records and counselling reports
- Health fund details and Medicare number
- Birth certificates
- Residency, visa status/citizenship
- Passport and/or visa information
- Dietary information for catering
- any court orders and parenting plans
- photos and videos at College events including footage from any security systems located at the College
- photos and/or videos of student's artwork or assessment pieces
- student emails and private emails (when using College issued email address) and internet browsing history.

The College may also collect the following types of sensitive information about students only where necessary or appropriate, or the student or parent has otherwise consented:

- racial or ethnic origin (including if students identify as Aboriginal or Torres Strait Islander)
- religious background
- sexual orientation (if it becomes known to the College)
- health information (disabilities/allergies/mental health/medical certificates, etc)
- biometric information to the extent used by the College to recognise staff, student and alumni faces in photos or videos to ensure all necessary consents are obtained before use.

#### **4.1.2 Parents and Guardians**

Parents, Guardians and students' families before, during and after the course of a student's enrolment at the College or Early Learning Centre:

- full name, date of birth, gender, address and contact details
- education, occupation, nationality and language spoken
- 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 (such as intervention and restraining orders), parenting plans or other parenting and access arrangements
- volunteering information (including Working with Children Checks)
- Dietary information for catering
- photos and videos at College events and on College premises including footage from any security systems located at the College.

The College may also collect the following types of sensitive information about parents only where necessary or appropriate, or the parent has otherwise consented:

- racial or ethnic origin (including if the parents identify as Aboriginal or Torres Strait Islander)
- Religious background.

#### **4.1.3 Job Applicants, Alumni, Volunteers, Homestay Providers, Third Party Providers and Contractors**

- name, contact details (including next of kin and emergency contact) and date of birth
- nationality and languages spoken

- information on job application
- skills and qualifications
- professional development history
- salary and payment information, including superannuation details
- complaint records and investigation reports
- leave details
- photos and videos at College events
- workplace surveillance records
- work emails and private emails (when using work email address) and internet browsing history
- blue card application status.

The College may also collect the following types of sensitive information only where necessary or appropriate, or you have otherwise consented:

- racial or ethnic origin (including if you identify as Aboriginal or Torres Strait Islander)
- medical information (e.g. details of disability and/or allergies, and medical certificates)
- religious background
- criminal record
- membership of professional or trade associations
- membership of trade unions

#### **4.1.4 Website Users and Others**

- The College may also collect information about you when you access the College's website using a technology called 'cookies'. That information includes the pages viewed and the information downloaded, the IP address of the computer or mobile used to visit the website, the page from where the individual visited the website, the type of browser used, unique device identifiers and information about websites visited before the individual visited the College's website. You can configure your browser to disable cookies, but some parts of the website may not function properly (or at all) if cookies are disabled.
- 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.

## **4.2. How personal information is collected?**

### **4.2.1. Personal information provided**

The College may collect personal information in a number of ways about an individual directly from that individual, where practical to do so, including but not limited to the examples listed below:

- electronic or paper documents (including forms, letters and invoices), face-to-face meetings and interviews, emails, telephone or videoconferencing calls
- from the College website using various technologies, including 'cookies'
- interactions between College staff and students, for example in classroom and other learning environments
- online tools (including apps and other software used by the College)
- polls, surveys and/or questionnaires
- photographs, videos and other recordings
- from other parties (such as education agencies, medical practitioners or other schools) to enable the College to discharge its duty of care
- from medical forms, incident reports, documents about work health and safety or workers compensation requirements (e.g. capacity to work certificates), Queensland College of Teachers or Working with Children Check requirements, provided by the applicant, or any other third party authorised by the applicant
- from other parties (such as recruiters, job applicants, representatives or referees, or social media sites)
- from publicly available sources.

#### **4.2.2. Personal information generated by artificial intelligence (AI) systems**

The College may collect personal information that is generated, inferred or derived through approved AI-enabled systems or digital tools used in connection with College operations, and only where such use is consistent with the College's Digital Governance Policy, privacy obligations and information security requirements.

#### **4.2.3. Personal information from other sources**

The College may collect personal information through surveillance activities (such as CCTV security cameras) and email monitoring.

#### **4.2.4. 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.

#### **4.2.5. 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.

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

The College will use personal information it collects for the primary purpose of collection. Personal information may also be used for a secondary purpose that is related to the primary purpose of collection, where this would be reasonably expected or has been consented to.

### **5.1. Students, parents and guardians**

In relation to the personal information of students, parents and guardians, the College's primary purpose of collection is to enable the provision of schooling to enrolled students; fulfil the College's legal obligations including duty of care; and perform administration activities. This includes satisfying the needs of students, parents/guardians, and the College, throughout the whole period a student is enrolled at the College.

In cases where the College requests personal information about a student or parent/guardian, and 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.

Personal information such as academic and sporting achievements, student activity details and similar news, including photographs and videos, may be published in the College's newsletters and magazines, or on the College's web portal and/or College website, or for marketing purposes (see below).

The College will obtain permission annually from the student's parent and/or guardian (and for the student if appropriate) to include photographs or videos and other identifying information in promotional material or other make publicly available.

## 5.2. Job Applicants, Third Parties and Contractors

In relation to personal information of job applicants, third parties and contractors, the College's primary purpose of collection is to assess suitability and (if successful) engage with the individual.

The purposes for which the College uses personal information of job applicants, third parties and contractors, includes:

- Administration of the individual's employment or contract
- Insurance
- To satisfy the College's legal obligations, e.g. in relation to its commitment to provide child safe environments.

## 5.3. Volunteers

The College collects personal information about volunteers who assist the College's functions or conduct associated activities, such as Parents and Friends, Friends of the Arts (FOTA) or Old Scholar Associations, as well as other activities. 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.

## 5.4. 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.

## 5.5. Fundraising

The College may collect personal information from parents, staff, alumni, contractors and members of the College when seeking donations or undertaking fundraising activities. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, e.g. the College's Old Scholar's Association or, on occasions, external fundraising organisations.

## 5.6. Marketing

The College may use or disclose the personal information that it holds about an individual, including students, staff, parents, volunteers, alumni and other members of the College community, for the purpose of direct marketing, with the consent of the relevant parties. Personal information in this context may include photographs and videos featured in College publications, such as newsletters, magazines, online and social media, and other marketing collateral. To opt-out of direct marketing or change previous preferences please contact the Marketing Team ([marketing@ssc.qld.edu.au](mailto:marketing@ssc.qld.edu.au)).

## 5.7. Artificial Intelligence

The College may use personal information in connection with an AI tool and other emerging technologies to support learning, administration and communication with the students and parents. The kinds of personal information that may be generated by AI systems include those set out above, under section 4.2 *How personal information is collected*. Personal information will not be entered into publicly available AI platforms. Where we use AI tools in connection with personal information, we will take reasonable steps to ensure that such use is consistent with the APPs and the Privacy Act, including by reviewing the terms of any third-party AI tools to understand how personal information may be handled. All use of AI will comply with the APPs and the College will ensure responsible use and management oversight.

## 5.8. Automated Decision-Making

The College may use personal information in approved automated technologies to assist staff in making certain administrative, educational, operational, safety and consent management decisions. These technologies may support, for example, the matching of photographs of staff or students against consent records to assist with image and publication consent management. The personal information used for these purposes may include photographs, names, student or staff identifiers and relevant consent records. The College does not rely solely on automated decision-making to make decisions that have legal or similarly significant effects on an individual, or that could significantly affect an individual's rights or interests. Automated technologies are used to support College staff and do not replace human review, judgement or oversight. If the College's use of automated decision-making changes in the future, the College will update this policy and, where required, notify affected individuals. Individuals may contact the Privacy Officer if they have questions about the College's use of automated decision-making.

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

## 6.1. 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:

- another school or staff at another school
- government departments, including for policy and funding purposes
- medical practitioners
- people providing educational, support and health services to the College, including specialist visiting teachers,, placement teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools
- assessment and educational authorities, including the Australian and Queensland governments, the Australian Curriculum, Assessment and Reporting Authority (ACARA), the Queensland Curriculum and Assessment Authority (QCAA) and NAPLAN Test Administration Authorities, who will disclose information to the entity that manages the online platform for NAPLAN
- people providing administrative and financial services to the College
- recipients of College electronic and print publications, such as newsletters and magazines
- students' parents/carers or guardians
- anyone parents/guardians authorise the College to disclose information to
- anyone to whom the College is required or authorised to disclose the information to by law, including child protection laws.

For international students, it may also include:

- education agents
- homestay providers or accommodation services
- VET or pathways providers
- Tutors or learning support providers
- Health or wellbeing professionals.

## 6.2. Sending and Storing Information Overseas

The College may disclose your personal information to overseas recipients in the course of providing services. Under the *Privacy Act*, the College is required to take reasonable steps to ensure that any overseas recipient does not breach the Australian Privacy Principles (APPs).

In some cases, the Australian Government may designate certain countries or international frameworks as having substantially similar privacy protections to those in Australia. If a recipient is located in a country that has been officially whitelisted by the Minister, the College may rely on that designation to satisfy our obligations under the *Privacy Act*.

As of the date of this policy, no countries have been formally whitelisted. Therefore, the College continues to assess and ensures that any overseas recipient handles personal information in accordance with the APPs.

The College may disclose personal information about an individual to overseas recipients, for example to facilitate a school exchange or overseas tours and/or support international students. 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)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging, learning management, education and assessment applications, administrative systems, records management, information storage and other technology service. Personal information may be disclosed, when necessary, to these service providers to enable authentication of users that access their services. This personal information may be stored in the 'cloud' which means it may reside on a cloud service provider's server, which may be situated outside Australia.

The College uses centralised information management and storage systems (Systems) provided by third party service providers. Personal information is disclosed and stored with third party service providers for the purpose of providing services to the College in connection with the Systems.

Microsoft provides Microsoft 365 including Outlook, and stores and processes limited personal information for this purpose. College personnel and the AIS and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering Microsoft 365 and ensuring its proper use.

The data centres where the personal information is likely to be kept are located within the Australian region or the United States.

## 6.3. Management and Security of Personal Information

The College staff are required to respect the confidentiality of students' and parent/guardian personal information and the privacy of individuals. The College has in place steps, including technical and organisational measures, to protect the personal information held, from misuse, interference and loss; unauthorised access; and modification or disclosure by use of various methods, including locked storage of paper records, and password access rights to computerised records.

# 7. Data Breaches

The College will deem an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of personal information, or a loss of personal information, held by the College
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result.

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

### 7.1. Eligible data breach assessment/investigation

If the College suspects that an eligible data breach has occurred, it will take reasonable steps to assess/investigate 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 publicise it in another manner.

### 7.2. 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.

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

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 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. A reasonable fee may be charged to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the likely cost will be advised in advance. If access to that information cannot be provided, written notice explaining the reasons for refusal will be provided. The College will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

### 8.1. 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, but are not limited to:

- giving access would have an unreasonable impact on the privacy of other individuals
- where the College believes the student has capacity to consent and the College is not permitted to disclose the information to the parent/guardian without the student's consent
- where the release may result in a breach of the College duty of care to a student.

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.

The College acknowledges the establishment of the Children's Online Privacy Code, which is expected to commence in December 2026. While the Code is not yet in effect, the College will monitor regulatory guidance and consider any required changes to its privacy practices, digital governance arrangements, online services and third-party technology provider assessments to support timely alignment when the Code commences.

## 9. Enquiries and Complaints

For further information about the way the College manages personal information, contact the Privacy Officer:

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 Policy and 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, Australia  
Telephone: 1300 363 992

## 10. Definitions

| Term                  | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Disclose              | Means to share personal information with another person or organisations outside the entity that originally collected the information.                                                                                                                                                                                                                                                                                                      |
| Health information    | Is defined as including information or opinion about a person's physical, mental or psychological health, or disability, which is also classified as personal information. This includes information or opinion about a person's health status and medical history, whether recorded or not.                                                                                                                                                |
| Personal information  | Means information or opinion that is provided or recorded in any form and, whether true or not, about an individual whose identity is apparent, or can reasonably be determined from the information or opinion. For example, this includes all paper and electronic records, photographic and video recordings.                                                                                                                            |
| Sensitive information | A subset of personal information that includes information or an opinion about an individual's: <ul style="list-style-type: none"><li>• racial or ethnic origin;</li><li>• political opinions;</li><li>• membership of a political association;</li><li>• religious beliefs or affiliations;</li><li>• philosophical beliefs;</li><li>• membership of a professional or trade association;</li><li>• membership of a trade union;</li></ul> |

| Term | Definition                                                                                                                                                                                                   |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | <ul style="list-style-type: none"> <li>• sexual preferences or practices;</li> <li>• criminal record;</li> <li>• health or genetic information;</li> <li>• some aspects of biometric information.</li> </ul> |
| Use  | Means to handle or conduct an activity with personal information within the College's control.                                                                                                               |

## 11. 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)*

*Australian Education Act 2013 (Cth)* and associated regulations

*Education Services for Overseas Students Act 2000 (Cth)*

*Education and Care Services National Law (Queensland)*

*Education and Care Services National Regulations*

*Invasion of Privacy Act 1971 (Qld)*

*Criminal Code Act 1899 (Qld)*

## 12. Related Policies and Procedures

Saint Stephen's College Staff Code of Conduct

Saint Stephen's College Student Code of Conduct

Saint Stephen's College Parent Code of Conduct

Saint Stephen's College Student Safety and Wellbeing Policy

Saint Stephen's College Child Safety and Wellbeing Policy and Procedure – ELC

Saint Stephen's College Student Safety and Wellbeing - Staff Code of Conduct

Saint Stephen's College Student Safety and Wellbeing – Raising and Responding to Concerns Policy and Procedure

Saint Stephen's College Student Safety and Wellbeing – Recruitment, Screening and Engagement Policy and Procedure

Saint Stephen's College Digital Governance Policy

Saint Stephen's College Complaint Resolution Policy and Procedure

Saint Stephen's College Cyber Security Policy

Saint Stephen's College Records Management Policy

Saint Stephen's College Risk Management Policy and Procedure

Saint Stephen's College Student Disability Discrimination Policy and Procedure

Saint Stephen's College Whistleblower Policy

## 13. References

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

## 14. Document Administration

| Version | Date        | Author                                       | Amendments                                                                                                                                                                                                                                                                                                                                                      |
|---------|-------------|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| V2.1    | June 2026   | J. Burford – Director of Risk and Compliance | Updated to reflect relevant legislative changes under the <i>Privacy and Other Legislation Amendment Act 2024</i> (Cth), including enhanced transparency requirements for automated decision-making and the introduction of the Children’s Online Privacy Code.                                                                                                 |
| V2.0    | August 2025 | J. Burford – Director of Risk and Compliance | Updated to reflect relevant legislative changes under the <i>Privacy and Other Legislation Amendment Act 2024</i> (Cth), including the introduction of a new statutory tort for serious invasions of privacy and a new criminal offence for doxxing, and to provide further detail on how the College collects, stores, uses and protects personal information. |
| V1.2    | August 2022 | B. Nicol                                     | Specific amendment details are not available from the College’s historical policy records.                                                                                                                                                                                                                                                                      |
| V1.1    | 2018        | B. Nicol                                     | Updated to reflect relevant legislative changes under the <i>Privacy Amendment (Notifiable Data Breaches) Act 2017</i> (Cth).                                                                                                                                                                                                                                   |