Privacy policy

Purpose

This statement outlines Parklands Christian College (here in after referred to as the 'College') policy on how the College uses and manages personal information provided to or collected by it. The College is bound by the National Privacy Principles contained in the Commonwealth Privacy Act. 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 school environment.

Definitions

List the definitions of terms used within the policy.

Term	Definition
Personal information	Personal information means information or an opinion whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.
Sensitive information	In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Scope

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

Obligations

The College is required to comply with the Australian Privacy Principles (APPs) in the *Privacy Act 1988* (Cth) (Privacy Act). The APPs direct the way in which personal information is processed throughout its life cycle, from collection, to use and disclosure, storage, accessibility and disposal.

Exception in relation to employee records:

Under the Privacy Act, 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 school's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the College and employee. However, the College takes seriously the handling of all employee information and will manage it in accordance with any other relevant laws, industrial instruments or internal policies.

Policy

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

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

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

- Pupils and parents and/or guardians ('Parents') before, during and after the course of a pupil's enrolment at the College;
- Job applicants, staff members, volunteers and contractors; and
- Other people who come into contact with the College.

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.

Personal Information provided by other people:

In some circumstances the College may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school.

How will the College use the personal information you provide?

The College will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

Pupils and parents

In relation to personal information of pupils and Parents, the College's primary purpose of collection is to enable the College to provide schooling 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 school.

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

- To look after pupil's educational, social and medical well-being;
- To keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- Day to day administration of the College;
- To seek 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.

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.

The purposes for which the College uses personal information of job applicants, staff members and contractors include:

- To administer the individual's employment or contract, as the case may be;
- To look after the wellbeing of an individual who enters an employment contract;
- For insurance purposes;
- To seek 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 alumni associations. This information is collected to enable the College and the volunteers to work together more effectively and to ensure the safety and wellbeing of our volunteers while on campus.

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 Foundation or alumni organisation (or, on occasions, external fundraising organisations).

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 parents do not wish to receive fundraising communications or have their personal information used for marketing purposes, they may opt out at any time by contacting the College in writing.

To whom might the college disclose personal information?

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

- Another school or staff at another school;
- Government departments (including for policy and funding purposes);

- Medical practitioners;
- People providing services to the Parklands Christian College, including specialist visiting teachers, counsellors, sports coaches, volunteers and providers of learning and assessment tools;
- Education and Assessment 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 Parklands Christian College;
- Recipients of Parklands Christian College publications, such as newsletters and magazines;
- A student's parents or guardians;
- Anyone you authorise the Parklands Christian College to disclose information to; and
- Anyone to whom we are required to disclose the information by law, including child protection laws.

Sending and storing information overseas

The College may disclose personal information about an individual to overseas recipients, for instance, when facilitating a school exchange or when storing personal information with 'cloud' service providers which are situated outside Australia.

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.

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 be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for Education' (GAPE) including Gmail, 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 GAPE and ensuring its proper use.

Sensitive information

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

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

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 protected computerised records, both with limited access rights.

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, financial and reputational harm.

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

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

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

Exception to notification obligation:

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

- there is no unauthorised access to, or unauthorised disclosure of, the information; and
- there is no serious harm to affected individuals, and because 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 make corrections themselves.

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

To make a request to access or update any personal information the College holds about you or your child, please contact the College Principal in writing. The College may require you to verify your identity and specify what information you require. The College may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

The 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

Parklands Christian College respects every parent's right to make decisions concerning their child's education. Generally, the College will refer any requests for consent and notices in relation to the personal information of a 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 (College Principal). However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the College's duty of care to the student.

The College may, at its discretion, on the request of a pupil grant that pupil access to information held by the Parklands Christian 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 circumstance warrant it.

Enquiries and complaints

If you would like further information about the way the Parklands Christian College manages the personal information it holds or wish to complain that you believe that the College has breached the Australian Privacy Principles please contact the College Principal on (07) 3380 4200. The College will investigate any complaint and will notify you of its decision in relation to your complaint as soon as is practicable after it has been made.

Category	☒	Business excellence and governance	BEG
	☐	People, health & well-being	PHW
	☐	Students	STU
	☐	Infrastructure, material resources & environment	INF
	☐	Staff	STA
	☐	Learning	LEA
	☐	School community	COM
	☐	Emergency response	EMR

Related procedures		N/A
Related forms		

Legislation and other requirements

Privacy Act 1988 (Cth)

Australian privacy Principles

Privacy Amendment (Enhancing Privacy Protection) Act 2012

Child Protection Policy

Disabilities Policy

Policy owner	College Board	**Authorised by**	Board Chair
		Signature	
Date	24 July 2025	**Next review date**	June 2026

Distribution	☒ Board members	☒ Teaching staff	
	☒ Administration staff	☒ Student services	

Risk category	**HIGH**	MEDIUM	LOW
Revision cycle	**1 year**	2 years	3 years

Revision history	Version number	Date	Version number	Date
	0.1		3.0	
	1.0	June 2024	4.0	
	2.0	June 2025	5.0	