



Privacy of Information

Board Policy 5.1	First Issued	19/3/06
	Last Review and Approved	3 June 2024
	Next Review Due	2025

1. Introduction

- 1.1. Citipointe Christian College (the College) is first and foremost a Christian school. Citipointe Christian College understands the divine power of honour and the importance of showing proper respect to everyone (1 Peter 2:17). By having strong principles of privacy the College is honouring the Citipointe College Community.
- 1.2. 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. The current version of this Privacy Policy is published on the College's website.

2. Purpose

- 2.1. This Privacy Policy sets out how the College manages personal information and people's rights in relation to their personal information, including how to complain and how the College deals with complaints.
- 2.2. The College is bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (Privacy Act). In relation to health records, the College is also bound by the Information Privacy Act 2009 (Qld).

3. Scope of the Policy

- 3.1. 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 College collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.
- 3.2. Certain acts or practices directly relating to employee records are exempt from the scope of the Privacy Act. As a result, this Privacy Policy does not apply to the College's treatment of an employee record held by the College, where the treatment is directly related to a current or former employment relationship between the College and the employee.¹

4. Policy

4.1. Kinds of personal information the College collects

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

- a) students before, during and after the course of a student's enrolment at the school:

¹ Privacy Act 1988 (Cth) S6(1)

- I. name, contact details (including next of kin), date of birth, gender, language background, country of birth, birth certificate, biometric templates, previous school and religion;
 - II. medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);
 - III. conduct and complaint records, or other behaviour notes, and school reports;
 - IV. information about referrals to government welfare agencies;
 - V. counselling reports;
 - VI. health fund details and Medicare number;
 - VII. court orders;
 - VIII. criminal records;
 - IX. volunteering information; and
 - X. photos and videos at school events.
- b) parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the school:
- I. name, contact details, date of birth;
 - II. religion, country of birth and nationality
 - III. vehicle registration details;
 - IV. occupation;
 - V. marital status;
 - VI. custody details;
 - VII. other children's details;
 - VIII. donation history;
 - IX. maiden name;
 - X. alumni year;
 - XI. whether alumni had further education;
 - XII. professional;
 - XIII. experience; and
 - XIV. personal news.
- c) job applicants, staff members, volunteers and contractors:
- I. name, contact details (including next of kin), date of birth, country of birth, nationality and religion;
 - II. Trade union membership;
 - III. criminal record check
 - IV. religious education
 - V. relevant child protection law information
 - VI. education and professional development history;
 - VII. professional association memberships;
 - VIII. salary and payment information, including superannuation details;
 - IX. medical information (e.g. details of disability and/or allergies, and medical certificates);
 - X. complaint records and investigation reports;
 - XI. leave details;
 - XII. photos and videos at school events;
 - XIII. workplace surveillance information;

- XIV. work emails and private emails (when using work email address) and Internet browsing history
 - XV. any other information on job application;
- d) 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 school.

4.2. How the College collects personal information

- a) *Personal information you provide:* The College generally collects personal information about an individual directly from the individual (or their Parent in the case of students). This includes by way of forms, face-to-face meetings and interviews, emails and telephone calls.
- b) *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, a reference from another school or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.
- c) *Personal information from other sources:*
 - I. The College may also collect personal information through surveillance activities (such as CCTV security cameras) and student email and College network use monitoring.
 - II. The College uses 'cookies' on its websites to ensure quality of experience. Consent to the use of cookies is assumed if users do not change their settings. Users can change cookie settings on their device to suit their preferences. When collecting data regarding a user, for example, who submits personal data online to register for a College Tour, residents of the UK, EU or Switzerland will be alerted to the fact that the College uses 'cookies' to track their data for the purposes of Tour follow up only. Users should update their preferences concerning cookies prior to entering personal data to register for a College Tour.

4.3. Purposes for which the College collects, uses and discloses personal information

The purposes for which the College collects, uses and discloses personal information depend on our relationship with you and include the following:

- a) Students and Parents:
 - I. providing schooling and school activities;
 - II. satisfying the needs of Parents, the needs of students and the needs of the College throughout the whole period a student is enrolled at the College;
 - III. making required reports to government authorities;
 - IV. keeping Parents informed about matters related to their child's schooling, through correspondence, the College's Learning Management System, apps and College publications;
 - V. day-to-day administration of the College;
 - VI. looking after students' educational, social and health wellbeing;

- VII. for marketing purposes and seeking donations for the College (see Marketing and Fundraising section of this Policy); and
 - VIII. to satisfy the College's legal obligations and allow the College to discharge its duty of care.
- b) Volunteers:
 - I. to contact individuals about, and administer, volunteer positions;
 - II. for insurance purposes; and
 - III. satisfying the College's legal obligations, for example, in relation to child protection legislation.
 - c) Job applicants and contractors:
 - I. assessing and (if successful) engaging the applicant or contractor;
 - II. administering the individual's employment or contract;
 - III. for marketing purposes and seeking donations for the College (see Marketing and Fundraising section of this Policy);
 - IV. for insurance purposes; and
 - V. satisfying the College's legal obligations, for example, in relation to child protection legislation.

4.4. Full and frank disclosure by parents of information

- a) Full and frank disclosure by parents of information sought is necessary to the formation of a contractual relationship between the College and parents.
- b) In some cases, where the College requests personal information about a student or parent, if the information requested is not obtained, the College may not be able to enrol or continue the enrolment of the student.

4.5. Who we disclose personal information to

The College may disclose personal, including sensitive information, for educational, care and administrative purposes and to seek support and advice. This may include to:

- a) other schools or staff at another school, including a new school to which a student transfers to facilitate the transfer of the student;
- b) government departments (including for policy and funding purposes);
- c) medical practitioners;
- d) people providing educational, support and health services to the College, including specialist visiting teachers, sports coaches and counsellors;
- e) organisations that assist us with marketing and fundraising (see Marketing and Fundraising section of this Policy)
- f) providers of specialist advisory services and assistance to the College, including in the area of Human Resources, child protection, students with additional needs and for the purpose of administering Microsoft applications (see further the section below 'Sending and storing information overseas');
- g) providers of learning assessment tools;
- h) 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);

- i) agencies and organisations to whom the College is required to disclose personal information for education, funding and research purposes;
- j) the provider of the College's information management and storage systems and other information technology services
- k) people providing administrative and financial services to the College;
- l) recipients of College publications, such as newsletters and magazines
- m) the students' parents or guardians;
- n) anyone the individual authorises the College to disclose their information to; and
- o) anyone to whom the College is required or authorised to disclose the information to by law, including child protection laws.

4.6. How we store personal information

- a) The College stores personal information in hard copy and electronically. The College also may use information management and storage systems provided by third party service providers. Personal information is stored with and accessible by the third party service providers for the purpose of providing services to the School in connection with the systems.
- b) The College may use online or 'cloud' service providers² to store personal information and to provide services to the College that involve the use of personal information. See further the section 4.7 - "Sending and storing information overseas".

4.7. Sending and storing information overseas:

- a) The College may disclose personal information about an individual to overseas recipients in certain circumstances.
- b) If the College needs to disclose personal information for a particular purpose in specific circumstances (eg a particular overseas excursion) the College will seek consent prior to the disclosure for that particular purpose³.
- c) The College may use online or 'cloud' service providers to store⁴ 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 and provide technical support. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia. For the purposes of storage and/or routing of data external to Australia all reasonable steps will be taken to ensure security is safeguarded⁵.

² For example: Microsoft Cloud, EdSmart

³ p112 *Privacy Compliance Manual* (2023) Independent Schools Australia and National Catholic Education Commission

⁴ This requirement only applies to a likely disclosure of personal information. It does not apply to a use of personal information that does not constitute a disclosure. For example, routing personal information, in transit, through servers located outside Australia would usually be considered a 'use' and not a 'disclosure'. This is the case when parents enter information via a form (EdSmart) that is transmitted to the college for storage (on Synergetic).

⁵ This includes ensuring the overseas recipient complies with the APPs when handling the personal information.

- d) An example of such a cloud service provider the College uses is Microsoft Cloud. Microsoft Cloud provides services, and stores and processes limited personal information. College personnel 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 and ensuring its proper use.

4.8. Marketing and Fundraising

- a) The College treats marketing and seeking donations for the future growth and development of the school 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 fundraising foundations within the College, for example, the Cardo Foundation and/or, on occasions, external fundraising organisations.
- b) If individuals do not want to receive marketing and/or fundraising communications from the College they can contact the College's Marketing and Communications Office <devoffice@citipointe.qld.edu.au> .
- c) College activities and news (including student achievements) are frequently published in the College's journals, newsletters and magazines, the College's website, on the College's Learning Management System, or otherwise shared with the School community (current, future and past students, parents and teachers). This may include personal information (including photographs and videos) of students and parents involved in College activities such as academic and sporting events and achievements, concerts and plays, school camps and school excursions. The College will obtain permissions annually if it would like to include photographs or videos or other identifying material of students (or parents) in its promotional material or otherwise make this material available to the public such as on the internet.
- d) If personal information is utilised for specific marketing campaigns⁶ the College will ensure consent is informed, current and specific.

4.9. Security of personal information

- a) 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.
- b) These steps include:
 - I. Restricting access to information on the College's School Management System on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
 - II. Ensuring all staff are aware that they are not to reveal or share personal passwords.
 - III. Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable

⁶ for example if a student's photo is used on a billboard or an advertisement in a newspaper or marketing brochure.

rooms. Access to these records is restricted to staff on a need to know basis.

- IV. Implementing physical security measures around the School buildings and grounds to prevent break-ins.
- V. Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- VI. Implementing human recourse policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- VII. Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

4.10. **Access and correction of personal information**

- a) Under the Privacy Act, an individual has the right to seek and obtain access to, and/or correction of, any personal information which the College holds about them. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.
- b) There are some exemptions to these rights set out in the applicable legislation.
- c) To make a request to access or to update any personal information the College holds about you or your child, please contact the Compliance Officer at mail@citipointe.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.
- d) If the College decides to refuse the request, it will provide the requester with written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to submit a complaint. Please note that complaints are only necessary if the requester wishes to challenge the decision.
- e) The College will respond to a request for access to personal information within a reasonable period after the request is made⁷.

4.11. **Consent and rights of access to the personal information of students**

- a) The College respects every parent's right to make decisions concerning their child's education.
- b) 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. Generally, 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.

⁷ This is generally 30 days. The obligation is to acknowledge the access request, not to make the access decision, within a reasonable period. See 'ZG' and Sydney Catholic Schools Ltd (Privacy) [2021] AICmr 89 and 'ZN' and a School (Privacy) [2021] AICmr 95 (17 December 2021).

- c) Parents may seek access to personal information held by the College about them or their child by contacting the Compliance Officer at mail@citipointe.qld.edu.au in writing. However, there will be occasions when access is denied. Such occasions may include (but are not limited to) where the College believes the student has capacity to consent and the College is not permitted to disclose the information to the Parent without the student's consent, 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 a student.
- d) 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 warrant it.

4.12. **Liaison with Queensland Police Service (QPS)**

- a) Images may be released to QPS or other law enforcement agencies in compliance with the Information Privacy Act 2009 (Qld). All requests made by the QPS or other law enforcement agencies should be referred to the Principal who will arrange request management. Matters involving child protection and student behaviour that involve notification and consultation with QPS and possible footage disclosure shall be overseen by the Principal.
- b) Information will not be given to any other person or agency unless authorised or required by law or if applied for under the Right to Information Act 2009 (Qld) or the Information Privacy Act 2009 (Qld)⁸.
- c) Where footage is disclosed for law enforcement or other purposes, a record of the disclosure shall be made and recorded along with the record of the request for disclosure.

5. **Process**

5.1. **Privacy breach**

All breaches or suspected breaches of privacy are to be reported to the Principal and/or the Director of IT or their delegate for immediate investigation and/or intervention. If the breach pertains to **eligible data**, the incident of the breach must be reported to the Privacy Commissioner within 30 days and to the police authority also, if it is of a criminal intent.

5.2. **Enquires and complaints**

- a) If individuals would like further information about the way the College manages the personal information it holds, or wish to complain that they believe that the College has breached the Australian Privacy Principles please contact the Compliance Office by email, post or telephone⁹. 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.

⁸ Information Privacy Act 2009 (Qld) Chapter 3

⁹ Attention: Compliance Officer

Email: mail@citipointe.qld.edu.au

Post: [322 Wecker Rd, Carindale, QLD 4152, Australia](#)

Phone: [07 3555 2700](tel:0735552700)

- b) If an individual is not satisfied with the College's response, then they may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

6. Legislative Provisions and Related Documentation

6.1. Legislative Provisions

- Freedom of Information Act 1982 (Cth)
- Privacy Act 1988 (Cth)
- Information Privacy Act 2009 (Qld)
- Right to Information Act 2009 (Qld)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
- Work Health and Safety Act 2011 (Qld)
- Australian Privacy Principles 2014 (Cth)

6.2. This policy is to be read in conjunction with other policies and College guidelines i.e.

- 4.3 Information Management and Security
- 4.3.1 Email
- 4.3.2 Staff Cyber and Social Media Policy
- 4.3.3 Record Keeping, Retention and Disposal Policy
- 4.3.4 Access and Management of College information
- 4.3.5 College Information and Database Access
- 4.3.6 Digital Technology Policy
- 4.3.7 Information Recovery (Contingency Planning)
- 4.3.8 Communication Policy
- 4.8 Intellectual Property and Copyright
- 4.7 Legal Compliance Policy
- 6.1.4 College Mobile Phone Policy
- 7.1 Student Protection
- 11.1 Staff Code of Conduct
- 11.4 Community Complaints and Feedback
- 11.6 Complaints Handling and Feedback Policy (Staff) (ver9.1 2023)
- Acceptable Use guidelines
- Cyber Acceptable Use Agreement for Students
- Citipointe Christian College Standard Collection Notice (Parents and Students)
- Citipointe Christian College Employment Collection Notice (for job applicant)
- Citipointe Christian College Contractor Collection Notice

6.3. References

- *Privacy Compliance Manual* (2023) Independent Schools Australia and National Catholic Education Commission

7. Policy Review

- 7.1. The policy will be reviewed annually or as otherwise required. The College may, from time to time, review and update this Privacy Policy, outside of the annual review to take account of new laws and technology, changes to College's operations and practices and to make sure it remains appropriate to the changing school environment.



Policy Review, Modification and Amendments

PRIVACY OF INFORMATION 5.1

Date	Section	Authorised By	Details
2/7/10	5.1.1		Amended 5.1.1 "The College is bound..." deleted "not". Addition: "The policy will be reviewed and updated in accordance to changes in legislative requirements and appropriateness to the College environment"
2/7/10	5.1.4		Addition: "Current changes can be requested through the College Administration department in writing or in person. An annual request for update of personal information will be sent to all students and staff at the beginning of each academic year."
2/7/10	Policy Circulation for Approval		Persons responsible for data collection Deleted " WHS Officer" replaced with " Business Manager and Registrar"
Mar 2014	All		Re-written with the introduction of the new APP – Australian Privacy Principles with input from Suzanne Brooks
Jan 2018			Incorporating amendment to privacy breaches, privacy act 2017 – mandatory reporting if privacy breach concerns "eligible" data. Included the members who make up the response team.
Sept 2018	All	Compliance Officer	Formatting – Line spacing and page breaks
Mar 2020	All	Compliance Officer	Logo position updated
Mar 2020	All	Compliance Officer	Paragraph numbering system updated in line with policy 2.1 Policies Framework
Mar 2020	All	Compliance Officer	College Executive members' titles updated
Mar 2020	1 Introduction	Compliance Officer	Addition of paragraph outlining connection of policy to Citipointe's Christian Worldview.
Mar 2020	3 Scope of Policy	Compliance Officer	Creation of Scope of Policy section in line with policy 2.1 Policies Framework
Mar 2020	6 Legislative Provisions and Relevant or Related Documentation	Compliance Officer	Section up-dated
May 2021	All	Compliance Officer	"take all possible measures" changed to "take all reasonable steps" inline with APP terminology
May 2021	4 Policy	Compliance Officer	Section up-dated to incorporate third-party vendors, cookies, overseas storage and routing of personal information
May 2021	6 Legislative Provisions and Relevant or	Compliance Officer	Section up-dated

	Related Documentation		
May 2023	Purpose	Compliance Officer	Updated to be in line with ISQ recommendations
May 2023	Scope of Policy	Compliance Officer	Updated to be in line with ISQ recommendations
May 2023	Policy	Compliance Officer	Sections 4.2, 4.5, 4.7, 4.9 added in line with ISQ recommendations
May 2023	Policy	Compliance Officer	Sections 4.6.3 added in line with ISQ recommendations
May 2023	Policy	Compliance Officer	Sections 4.10, 4.14 and 4.13 updated to be in line with ISQ recommendations
May 2023	Process	Compliance Officer	Sections 5.1.3 and 5.1.5 added in line with ISQ recommendations
May 2023	Process	Compliance Officer	Sections 5.2 and 5.3 added in line with ISQ recommendations
May 2023	Legislative Provisions and Related Documentation	Compliance Officer	Updated to include relevant Legislation and Policy
May 2023	Policy Review	Compliance Officer	Updated to be in line with ISQ recommendations
July 2023	Introduction	College Board	Amendments made to introduction – addition of section 1.3
May 2024	All	Compliance Officer	Complete rewrite to bring policy in line with new <i>Privacy Compliance Manual</i> (2023) Independent Schools Australia and National Catholic Education Commission

PRIVACY OF INFORMATION 5.1
Policy Circulation for Approval



CIRCULATED TO:	Approved	Date	Signature
Principal	Yes	27/3/24	Ruth Gravestein
Assistant Principal	Yes	27/3/24	Chris Eustace
Head of Primary	Yes	27/3/24	Kim Piercey
Head of Secondary	Yes	27/3/24	Cameron Ivres
Head of International	Yes	27/3/24	Lillian Myers
Business Manager	Yes	27/3/24	Dan Joy
Other -			
Approved by Board	Yes	6/6/24	John Ryan