

NAMBOUR CHRISTIAN COLLEGE LTD

PRIVACY POLICY

College Policy 15.0

ISSUED	Oct 2003	LOCATED	Website, Staff Portal, Parent Lounge, Board Portal, Visitor Inductions T:\Admin\Policies		
REVISED	29 July 2008	26 July 2011	October 2012	25 March 14	July 2017 - aligned with GCC 9/16. Still under Review due to continual law changes
	27 February 2018 (updated from ISQ January 2018 policy to include data breach)	Approved at Board 27 October 2020	8/12/2021 COVID vaccination details included in item 12. Approved by GV	Approved at Board 22 February 2022	March 2023 – Aligned with ISQ and approved at Exec. Approved at Board 28 March 2023
	Approved at Exec 30 July 2026	Approved by the Board 13 Aug 2026			
REVISION SCHEDULE	Annually or as required		APPROVED BY	NCC Board / College Executive	
DOCUMENT OWNER/S	Head of Business Operations, Director of IT, Director of Marketing, Head of People and Culture				

POLICY

1. Introduction

Nambour Christian College is bound by the Australian Privacy Principles (APP) contained in the Privacy Act 1988 (Cth). This statement outlines the privacy policy of the College and describes how the College uses and manages personal information to or collected by it.

2. Scope

The policy applies to Board members, employers, employees, job applicants, volunteers, parents/guardians, students, contractors and people visiting the College 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. Related Documents

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (<https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference/>)
- Application Forms
- Admission/Enrolment Contract
- Enrolment Policy
- Student Safety and Wellbeing Policies and Procedures
- Inclusion and Disability Policy
- Complaints Policy
- AI Policy
- Other relevant College Policies

4. Exception in Relation to Employee Records

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

5. Definitions

Australian Privacy Principles (at July 2026)

<https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference/>

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

Breach means unauthorized access and unauthorized disclosure of personal information of individuals including in circumstances where there has been a possible unauthorized access or disclosure which compromises personal data.

Disclose means to share personal information with another person or organisation outside the entity that originally collected the information.

Eligible data refers to personal information of a sensitive (confidential) nature which could result in significant harm / damage or risk to those affected by a breach.

Examples of eligible data breaches include:

- Disclosures of Medicare numbers or financial accounts; and
- Disclosure of mental illness, disability, or residential address of "protected people".

The consequences of eligible data breaches can include:

- Threat to emotional wellbeing
- Damage to reputation; and
- Defamation

Employee means all employees employed by the College, including applicants and prospective employees.

Employee Record means a record as defined by the Privacy Act. (Employment Records are exempt from Privacy Protection)

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.

Health Service includes an activity performed to assess, record, maintain or improve an individual's health, to diagnose an illness or disability, to treat an individual, or the dispensing on prescription of a drug or medicinal preparation by a pharmacist.

Mandatory Notification means that the College must notify the Australian Information Commissioner when an eligible breach has occurred.

Parent is the parent / guardian / carer of a student.

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 is defined as information relating to a person's racial or ethnic origin, political opinions, religion, trade union, or other professional, or trade association membership, sexual preferences, biometric information or criminal record that is also classified as personal information about an individual.

Student means prospective, current, or past student of the College.

Use means to handle or conduct an activity with personal information within the organisation's control.

Within this policy **Nambour Christian College** uses the terms "School", "College" and "Nambour Christian College" interchangeably to refer to Nambour Christian College.

In this policy personal information refers to personal information, sensitive information and health information collectively unless otherwise specified.

6. What Personal Information is Collected

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

- Students and parents and/or guardians (herein called 'parents') before, during and after the course of a student's enrolment at the College:
 - Name, contact details (including next of kin), date of birth, gender, language background, previous school and religion
 - Parents' education, occupation and language spoken at home, nationality and country of birth
- Health information (e.g. details of disability and/or allergies, absence notes, medical reports, immunisation details, 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
 - 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
 - Working with Children Check (Blue Card), Exemption Card and/or Teacher Registration details
 - 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 College, including name and contact details and any other information necessary for the particular contact with the College.

7. How Personal Information is Collected

7.1. Personal information provided by students and families

The College will generally collect personal information held about an individual by way of forms filled out by parents or students, face-to-face meetings and interviews, photos and video recordings, observations, emails and telephone calls.

7.2. 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 transfer note from another school.

7.3. Personal information from other sources

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

7.4. How Personal Information is Used

The College will use personal information it collects from you 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.

8. Students and Parents

In relation to personal information of students and parents, 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 administrative activities. This includes satisfying the needs of students, parents and the College, throughout the whole period the student is enrolled at the College.

In cases where the College requests personal information about a student or parent, if the information requested is not provided, the College may not be able to enroll 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 College newsletters, magazines and on our website, or for marketing purposes (See Section 11. Marketing).

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

9. Job Applicants and Potential Contractors

In relation to personal information of job applicants and potential contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor.

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

- administration of the individual's employment or contract
- To undertake referee checks and to confirm information provided in job applications
- For insurance purposes
- To satisfy the College's legal obligations, e.g., in relation to child protection legislation.

10. Volunteers

The College collects personal information about volunteers who assist the College's functions or conduct associated activities, such as alumni associations. The purposes for which the College uses personal information of volunteers includes:

- to contact the volunteer, and administer, the volunteer position
- for insurance purposes
- to satisfy the College's legal obligations, e.g., in relation to child protection legislation.

11. 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 Foundation or alumni organisation or, on occasions, external fundraising organisations.

12. 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 school publications, such as newsletters, magazines, online and social media, and other marketing collateral.

To opt-out of direct marketing or change previous preferences contact the College via info@ncc.qld.edu.au

When the College collects personal information from a third party, this information will only be used for the purposes of direct marketing, with the consent of the relevant parties. In this case, the College will provide an opt-out option.

13. Automated Decisions

The College does not use personal information to make decisions solely through automated processes or computer programs. All decisions that may significantly affect an individual's rights, interests, or opportunities are reviewed and made by appropriately authorised College staff. While technology may be used to support administrative processes, personal information is not used by automated systems to make decisions about individuals without meaningful human involvement.

14. Artificial Intelligence (AI) Systems

The College may use AI tools as outlined in the Nambour Christian College AI Policy.

15. Disclosure and Storage of Personal Information

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

This may include:

- Another school or staff at another school for the purpose of student transfer
- Government departments (including for policy and funding purposes)
- Medical practitioners
- People providing educational, support and health services to the College, including specialist visiting teachers, sport coaches, volunteers, counsellors and providers of learning and assessment tools

- Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- People providing administrative and financial services to the College
- Recipients of College publications, such as newsletters and magazines
- Students' parents or guardians
- Anyone parents authorise the College to disclose information to
- Anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

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 school in connection with the Systems.

15.1. Disclosure and storage of information overseas

The College may disclose personal information about an individual 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 e.g., to facilitate a school exchange. However, the College will not send personal information about an individual outside Australia without:

- Obtaining the consent of the individual (in some instances 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. 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.

15.2. Management and security of personal information

The College's staff are required to respect the confidentiality of students' and parents' 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.

16. 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, or a loss of personal information, held by the College about one or more individuals
- 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.

16.1. Eligible data breach assessment/investigation

If the College suspects that an eligible data breach has occurred, it will carry out 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 (mandatory notification) 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.

16.2. 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.

In the event of a data breach see: *Critical Incident Procedure: Privacy Data Breach*

17. Access and Correction of Personal Information

Under the Privacy Act, an individual has the right to seek and 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 this right set out in the Privacy Act. 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 any information the College holds, (if you are unable to update/view the information yourself through the Parent Lounge or Parent Orbit App), please contact:

Executive Principal or Head of Business Operations
PO Box 500, Nambour, QLD, 4560
Phone: 5451 3333
Email: info@ncc.qld.edu.au

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 a request for access is refused, in accordance with the APP, the College will provide written reasons why the request was refused. Details on how to make a complaint will also be included in this response.

18. 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, any requests for consent and notices in relation to the personal information of a student will be referred 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 about them or their child by contacting the Executive Principal. However, there will be occasions when access is denied. Such occasions may include (but are not limited to):

- where release of the information would have an unreasonable impact on the privacy of others
- 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 the release may result in a breach of the College's 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 warrant it.

19. Enquiries and Complaints

For further information about the way the College manages personal information, contact the Executive Principal.

To make a complaint about a breach of the Australian Privacy Principles refer to Nambour Christian College's Complaints Policy.

Further information is available from the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

Annexure A

Alumni Collection Notice

1. We may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of Nambour Christian College and to keep alumni members informed about other members.
2. From time to time we may engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by the College to assist in its fundraising activities. If you do not agree to this, please advise us now.
3. We may publish details about you in our Harvest Weekly, Harvest Review or the College's website. If you do not agree to this, you must advise us now.
4. The College's Privacy Policy, accessible on the College's website, contains details of how you may seek access to and correction of your personal information which the College has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
5. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
6. The College uses centralised information management and storage systems (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 College in connection with the Systems.
7. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.

Annexure B

Employment Collection Notice

1. In applying for this position, you will be providing Nambour Christian College (the College) with personal information. We can be contacted at PO Box 500, Nambour 4560 or by email at employment@ncc.qld.edu.au or by telephone on 07 5451 3333.
2. If you provide us with personal information, for example, your name and address or information contained on your resume, we will collect the information in order to assess your application for employment. We may keep this information on file, if your application is unsuccessful in case another position becomes available, for a period of no longer than 12 months.
3. The College's Privacy Policy, accessible on the College's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We may disclose this kind of information to the following types of organisations e.g. support vendors that provide services around staff administration systems or applicant assessment services for select positions.
5. You may be required to provide the College with a criminal record check and a Working with Children Check (Blue Card) under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as email services. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
7. The College uses centralised information management and storage systems (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 College in connection with the Systems.
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.

Annexure C

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the College, you will be providing Nambour Christian College with personal information. We can be contacted at PO Box 500, Nambour 4560 or by email at info@ncc.qld.edu.au or by telephone on 07 5451 3333.
2. If you provide us with personal information, for example your name and address, we will collect the information in order to assess your application. We may also make notes and prepare a confidential report in respect of your application. You agree that we may store this information.
3. The College's Privacy Policy, accessible on the College's website, contains details of how you may complain about a breach of the Australian Privacy Principles and how you may seek access to and correction of your personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others. Any refusal will be notified in writing with reasons if appropriate.
4. We will not disclose this information to a third party without your consent unless otherwise permitted to.
5. We are required to collect information such as a Working with Children Check (Blue Card) under Child Protection law. We may also collect other personal information about you in accordance with these laws.
6. The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the College's use of on online or 'cloud' service providers is contained in the College's Privacy Policy.
7. The College uses centralised information management and storage systems (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 College in connection with the Systems.
8. If you provide us with the personal information of others, we encourage you to inform them that you are disclosing that information to the College and why.