KING'S CHRISTIAN COLLEGE

Privacy Policy

Foundational Values			
Purpose:	This Privacy Policy describes how King's Christian College handles personal information provided to or collected by the College for the purposes of our obligations under the *Privacy Act 1988* (Cth) (**Privacy Act),** including the Australian Privacy Principles (**APP**).		
Scope:	This policy applies to Board members, employers, employees, volunteers, parents/guardians, students, contractors and visitors. This policy outlines the type of information the school collects,		
Status:	Approved	**Supersedes**: December 2022	
Authorised by:	College Board	**Date of Authorisation**: November 2025	
Relevant Legislation, Standards and Codes:	• *Privacy Act 1988* (Cth) • Australian Privacy Principles		
Related Documents:	Policies:	• Child Protection Policy • Disabilities Discrimination Policy • Complaints Handling Policy	
	Procedures:		
	Guidelines:	• Queensland Education and Training Sector retention and disposal schedule	
	Templates:		
	Forms	• Standard Collection Notice • Employment Collection Notice	

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Review Cycle:	Annually, or as appropriate, to take account of new laws and technology, changes to school's operations and practices and to make sure it remains appropriate to the changing environment.	**Next Review Date**: December, 2026
Policy Author:	Gayle Coulter and ISQ Template	
Policy Owner:	College Board	

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1. Introduction

This Policy details how we protect your privacy and how we comply with the requirements of the *Privacy Act 1988* (Cth) (**Privacy Act),** including the Australian Privacy Principles (**APP**) while reflecting our commitment to Christian values and ethical stewardship.

2. Definitions

Australian Privacy Principles ('APPs')	Means the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth): Schedule 1.
Automated decision making ('ADM')	Where computer programs are used directly or substantially to do a thing or make a decision that could be reasonably expected to significantly affect the rights or interests of an individual. For example, an automated system marking an exam and deciding an individual's grade.
Personal Information	Means information or an opinion about an identified individual, or an individual who is reasonably identifiable: a) whether the information or opinion is true or not; and b) whether the information or opinion is recorded in a material form or not.
Sensitive Information	Is 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.
Personally Identifiable Information (PII)	Information enabling an individual to be identified, contacted or located.
King's Christian College	Is used interchangeably with the College, King's, and King's Christian College, We/we, Us/us.
Use	means to handle or conduct an activity with personal information within the organisation's control.
Disclose	means to share personal information with another person or organisation outside the entity that originally collected the information.

3. Policy Statement

3.1 Statement

This Privacy Policy describes how King's Christian College ("the College" or "the School") handles personal information provided to or collected by the College for the

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purposes of our obligations under the *Privacy Act 1988* (Cth) (**Privacy Act),** including the Australian Privacy Principles (**APP**).

3.2 Exception in Relation to Employee Records

The Australian Privacy Principles do not apply to certain personal information held by King's within an employee record. The exemption applies where King's act or practice directly relates to either a current or former employment relationship between King's and the employee, or an employee record held by King's relating to the individual.

Some parts of this privacy policy will apply to personal information held by King's about its employees to a limited extent.

3.3 Kinds of information the College collects

The College collects various types of information based on your interactions with us. The type of information the College collects and holds includes, but is not limited to, information about:

a. Students and their parents and/or guardians (**parents**), before, during and after the course of a student's enrolment at the College;

b. Job applicants;

c. Staff members;

d. Volunteers;

e. Contractors; and

f. Other individuals who come into contact with the College.

3.4 Kinds of personal and sensitive information collected

3.4.1. Students and their parents and/or guardians (parents) before, during and after the course of a student's enrolment at the College:

a. Name;

b. Contact details (including next of kin);

c. Date of birth;

d. Gender;

e. Language background;

f. School reports;

g. Previous school and religion;

h. Parents' education, occupation and language background;

i. Medical information (e.g. details of disability and/or allergies, absence notes, medical reports and names of doctors);

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j. Health fund details and Medicare number;

k. Conduct and complaint records, or other behaviour notes;

l. Information about referrals to government welfare agencies;

m. Counselling reports;

n. Any court orders;

o. Volunteering information;

p. Photos and videos at school events;

q. Grades and transcripts;

r. Progress reports;

s. Personalised learning plans;

t. Internet protocol (IP) addresses; and

u. Location information from mobile devices.

3.4.2. Job applicants, staff members, volunteers and contractors:

a. Name;

b. Contact details (including next of kin);

c. Date of birth;

d. Religion;

e. Information on job application;

f. Professional development history;

g. Salary and payment information, including superannuation and tax file details;

h. Medical information (e.g. details of disability and/or allergies, and medical certificates);

i. Complaint records and investigation reports;

j. Leave details;

k. Photos and videos at school events;

l. Workplace surveillance information; and

m. Work emails and private emails (when using work email address) and internet browsing history.

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3.4.3. 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.

3.5. How we collect personal information

3.5.1. Personal Information people provide:

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, emails and telephone calls. On occasions, people other than parents and students provide personal information.

3.5.2. 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 reference from another school. 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.

3.5.3. Personal information from other sources:

We may also collect personal information through surveillance activities such as CCTV security cameras, and student email or device monitoring. We also collect information from our website, https://www.kingscollege.qld.edu.au, using tracking pixels.

3.6. Purposes for which we collect, use and disclose personal information

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

3.6.1. Students and Parents/Guardians

a. providing schooling and school activities;

b. satisfying the needs of Parents, the needs of students and the needs of the King's throughout the whole period a student is enrolled at King's;

c. making required reports to government authorities;

d. keeping Parents informed about matters related to their child's schooling, through correspondence, apps, newsletters and magazines;

e. day-to-day administration of King's;

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f. looking after students' educational, social and health wellbeing;

g. seeking donations for the College (see the 'Fundraising' section of this Privacy Policy); and

h. to satisfy King's legal obligations and allow King's to discharge its duty of care.

3.6.2. Volunteers:

a. to contact you about, and administer, the volunteer position;

b. for insurance purposes; and

c. satisfying the College's legal obligations, for example, in relation to child protection legislation.

3.6.3. Job applicants and contractors:

a. assessing and (if successful) engaging the applicant or contractor;

b. administering the individual's employment or contract;

c. seeking donations for the College (see the 'Fundraising' section of this Privacy Policy);

d. for insurance purposes; and

e. satisfying the College's legal obligations, for example, in relation to child protection legislation.

3.6.4. Marketing:

a. For direct marketing purposes to encourage future enrolments.

3.7. Automated Decision Making

We use personal information in the operation of computer programs to make, or assist us in making, certain decisions (automated decisions). The personal information we use for this purpose includes:

a. Full Name

b. Gender

c. Educational support requirements

The decisions we make using this information in the operation of computer programs are as follows:

a. Class selection;

b. Other decisions as notified by us from time to time.

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3.8. Who we disclose personal information to

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

a. other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;

b. people providing educational, support and health services to the College, including specialist visiting teachers, [sport] coaches, volunteers, tutors and counsellors;

c. government departments (including for policy and funding purposes);

d. medical practitioners;

e. providers of learning and assessment tools;

f. 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);

g. 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 365 and ensuring its proper use (see further the section below 'Sending and storing information overseas);

h. people providing administrative and financial services to the College;

i. students' parents or guardians;

j. anyone you authorise the College to disclose information to;

k. agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;

l. the provider of our information management and storage system and other information technology services;

m. the provider of our enrolment system;

n. recipients of the College publications, such as newsletters and magazines;

o. third-party providers of photographs for the College, such as event photographers and external imaging services;

p. organisations that assist us with fundraising (see the 'Fundraising' section of this Privacy Policy); and

q. anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

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3.9. How we store personal information

The College stores your personal information electronically and in hard copy. We use information management and storage systems provided by third-party service providers. Personal information is stored with and is accessible by the third-party service providers for the purpose of providing services to the College in connection with the systems.

The College may use online or 'cloud' service providers to store personal information and to provide services to store personal information and to provide services to the College that involve the use of personal information. See further the section below 'Sending and storing information overseas.'

3.10. Sending and storing information overseas

The College may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate a school exchange, or tour.

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, King's 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, King's continues to assess and ensures that any overseas recipient handles personal information in accordance with the APPs.

However, the College will not send personal information about an individual outside Australia without:

a. Obtaining consent of the individual (in some cases this consent will be implied)

b. Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The College may use other online or 'cloud' service providers to store personal information and to provide online 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'

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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 Microsoft 365. Microsoft Office 365 provides applications such as Outlook, and stores and processes limited personal information for that purpose. The College personnel and the service providers may have the ability to access, monitor, use or disclose emails, communications, for example Teams or instant messaging, documents and associated administrative data for the purposes of administering Microsoft 365 and ensuring its proper use.

3.11. Countries your data may be transferred to

The College takes reasonable steps to ensure that personal data is processed and stored within Australia wherever possible. However, in the course of delivering our services, it is sometimes necessary to engage third-party providers whose data storage infrastructure may be located overseas. For example, 3P Learning Ltd (providers of ABC Reading Eggs, Mathletics, and ABC Mathseeds) uses Amazon Web Services (AWS), which hosts data in Australia, the United States, and Europe.

Additionally, our teaching staff may use various educational applications to support curriculum delivery. Some of these tools may store or process data in jurisdictions outside of Australia, depending on their operational setup. While the College aims to partner with reputable providers, we cannot always control the exact location of data storage by these third parties.

3.12. Marketing and Fundraising

The College treats 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 used for the purposes of encouraging future enrolments, or to send information about upcoming Fundraising events such as Carnival Days. From time to time we may send information about events such as Tours or Open Days, or general information about enrolling into the College to people who have previously expressed interest.

An option to opt-out of receiving this material will be routinely available within the specific marketing material.

The College uses tracking pixels and similar tools to gather data on user interactions with our website and marketing content. These tools help us understand user behaviour, measure the effectiveness of our campaigns, and deliver more relevant ads. By analysing

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this data, we can refine our strategies to better serve user interests and improve overall marketing performance.

In some instances, the College and associated Parent and Friends Association (P&F) uses third-party providers such as Humanitix, to provide ticketing services.

If you do not want to receive fundraising communications from us, please contact our Privacy Officer at privacy@kingscollege.qld.edu.au.

3.13. Management and Security of personal information

The College has in place steps to protect the personal information the school 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.

These steps include:

a. Restricting access to information on the College databases on a need-to-know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.

b. Ensuring all staff are aware that they are not to reveal or share personal passwords.

c. Ensuring where personal and health information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need-to-know basis.

d. Implementing physical security measures around the College buildings and grounds to prevent break-ins.

e. Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.

f. Implementing human recourses 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.

g. 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.

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3.14. Data Breaches

King's will deem an 'eligible data breach' has occurred if:

a. there has been unauthorised access to, or unauthorised disclosure of personal information, or a loss of personal information, held by the school

b. 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.

3.14.1. Eligible data breach assessment/investigation

If King's 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 King's will be required to lodge a statement to the Privacy Commissioner (Commissioner). Where practical to do so, the school will also notify the affected individuals. If it is not practicable to notify the affected individuals, King's will publish a copy of the statement on its website or publicise it in another manner.

3.14.2. 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:

a. there is no unauthorised access to, or unauthorised disclosure of, the information

b. 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.

3.15. Access and correction of personal information

Under the *Privacy Act 1988* (Cth) an individual has the right to seek access to, and/or correction of, any personal information which the College holds about them and to advise the College of any perceived inaccuracies. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.

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

To make a request to access, update or correct any personal information the College holds about you or your child, please contact the Privacy Officer by email at

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privacy@kingscollege.qld.edu.au, post or telephone. Contact details are provided in the Enquiries and complaints section.

The College may require you to verify your identity and specify what information you require. The College may charge a reasonable fee for giving access to your personal information (but will not charge for the making of the request or to correct your personal information). 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 the any personal information is accurate, up to date, complete, relevant and not misleading. Routine personal information such as contact details and relevant student medical details are available for parents to review and update in the Parent Lounge of the web portal.

3.16. 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.

Parents may seek access to personal information held by the College about them or their child by contacting the Privacy Officer at privacy@kingscollege.qld.edu.au, by telephone or in writing (details in the section above 'Access and correction of personal information').

However, there may 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 the 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.

3.17. Enquiries and complaints

If you would like further information about the way the College manages the personal information it holds, or wish to complain that you believe that the College has breached the Australian Privacy Principles please contact the Privacy Officer by email, post or telephone at:

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Attn: Privacy Officer

King's Christian College

68 Gemvale Road,

Reedy Creek, QLD 4227

Ph: (07) 5587 7600

Email: privacy@kingscollege.qld.edu.au

Alternatively, a Complaint can be made via our Complaints form on our website at King's Christian College.

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.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) via the OAIC website, www.oaic.gov.au.

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4. Appendix

Appendix 1 – Standard Collection Notice

KING'S CHRISTIAN COLLEGE

Standard Collection Notice

How and Why the School Collects Personal Information

1. King's Christian College collects personal information, including sensitive information about students and parents or guardians before and during the course of a student's enrolment at the School. This may be in writing or in the course of conversations. We might also collect personal information by using AI systems to generate it. The kinds of personal information that may be generated by AI systems include those set out in the King's Privacy Policy under the heading 'Kinds of personal and sensitive information we collect'.
2. The primary purpose of collecting this information is to enable the King's to provide schooling to students enrolled at the school, exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable students to take part in all the activities of the School.
3. Some of the information we collect is to satisfy the School's legal obligations, particularly to enable the School to discharge its duty of care.
4. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and Public Health and Child Protection laws.
5. Health information about students is sensitive information within the terms of the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988*. We may ask you to

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provide medical reports about students from time to time.

6. A student's enrolment may be delayed or prevented if the School cannot collect certain personal information. This is particularly so where the information is relevant to the health and safety of the student, other students and/or staff.
7. If you provide the School with personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the School and why.

To Whom Does the School Disclose Information

8. The School may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
    - other schools and teachers at those schools;
    - government departments (including for policy and funding purposes);
    - medical practitioners;
    - people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
    - 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);
    - third-party providers of our information management and storage systems (for the purpose of the providers providing services to the School in connections with the systems);
    - people providing other information technology services to the School;
    - people providing administrative and financial services to the School;
    - anyone you authorise the School to disclose information to; and
    - anyone to whom the School is required or authorised by law, including child protection laws, to disclose the information.
9. Personal information collected from students is regularly disclosed to their parents or guardians.

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10. On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our intranet and on our website. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. At enrolment, parents are asked to sign consent for their child(ren)'s images to be used in school publications for marketing purposes. If consent is not given, parents will be asked to nominate the specific uses for which their child's image should not be used.
11. The School may include students' and students' parents' contact details in a class list and school directory.

Overseas Storage and/or Disclosure

12. The School may use online or 'cloud' service providers to store personal information and to provide services to the School that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
13. The School 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 School in connection with the Systems.
14. The School may disclose your personal information to overseas recipients in the course of providing our services. Under the Privacy Act, King's Christian 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 School may rely on that designation to satisfy our obligations under the Privacy Act. As of the date of this notice, no countries have been formally whitelisted. Therefore, the School continues to assess and ensures that any overseas recipient handles your personal information in accordance with the APPs.
15. The School uses AI systems that are provided by third parties. These third parties may store or have access to personal information input into, and/or generated by,

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these AI systems. These third parties may be located outside of Australia, including in the United States, Canada, Europe, India, Japan, Singapore, and South Korea

Your Rights and How to Complain

16. The School's Privacy Policy, accessible on the School's website, sets out how parents or students may seek access to and correction of their personal information which the School 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, where access may result in a breach of the School's duty of care to a student, or where students have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
17. The School's Privacy Policy also sets out how parents and students can make a complaint about a breach of the APPs and how the complaint will be handled.

Fundraising

18. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you.
19. King's will not disclose your personal information to third parties for their own marketing purposes without your consent.

CRICOS Provider 00341A

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Appendix 2 – Employment Collection Notice

KING'S CHRISTIAN COLLEGE

Employment Collection Notice

1. In applying for this position, you will be providing King's Christian College with personal information. We can be contacted at:
   Address: Reedy Creek Campus
   68 Gemvale Road, Reedy Creek
   Email: hr@kingscollege.qld.edu.au
   Phone: (07) 5587 7600
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.
3. The College's Privacy Policy, accessible on the College 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 School 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.
5. Child Protection Legislation requires us to collect information regarding your suitability to work with children. 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 School that involve the use of personal information, such as email services. Some limited personal information may also be provided to these

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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 Privacy Policy.

7. The College uses centralised information and storage systems (Systems) provided by 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.

CRICOS Provider 00341A

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5. Document Control

Communication/Access:	Document Audience:	
	☒	Staff
	☐	Students
	☒	Parents/Community
	Published Location(s):	
	☒	School Website
	☒	Compass
	☐	

Training:	People:		Frequency:
	☐	Board	
	☒	Senior Management	Annually
	☒	Staff	Annually

Version Control No.	Description/Details of Change	Date Authorised
1.		December 2022
2.	Reviewed	December 2024
3.	Updated with additions of: • Definitions • Automated Decision Making • Countries data held • Appendix 1 – Standard Collection Notice • Appendix 2 – Employment Collection Notice	November 2025

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