

Privacy Policy

Revised August 2015

Christian Community Ministries (CCM) operates colleges providing primary and secondary school education in Queensland, New South Wales and South Australia. CCM is also an approved operator of early childhood education and care centres in Queensland. This Privacy Policy sets out how CCM and each college or centre manages personally identifiable information provided to or collected by it.

CCM is bound by the Australian Privacy Principles in the Commonwealth *Privacy Act 1988* and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. In relation to health records, each CCM college or centre is also bound by applicable State legislation.

CCM may, from time to time, review and update this Privacy Policy to take account of new laws or technology, changes to CCM's operations or practices and to ensure it remains appropriate to the changing school education and child care environment.

Definition

The College in this Privacy Policy means the schools and childcare centres operated by CCM – which includes Blakes Crossing Christian College, Burnett Youth Learning Centre, Chinchilla Christian College, Dalby Christian College, Endeavour Christian College, Groves Christian College, Livingstone Christian College, Seaview Christian College, Staines Memorial College, The Lakes Christian College, Warwick Christian College, Whitsunday Christian College and CCM Central Office.

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

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

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

Personal Information you provide:

The College will generally collect personal information held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and students provide personal information.

Personal Information provided by other people:

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

Exception in relation to employee records:

Under the *Privacy Act*, the Australian Privacy Principles do not apply to an employee record. 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.

How will the College use the personal information you provide?

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

Students and Parents

In relation to personal information of students and Parents, the College's primary purpose of collection is to enable the College to provide schooling for the student. This includes satisfying the needs of Parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College.

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

- to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
- day-to-day administration of the College;
- looking after students' educational, social and medical wellbeing;
- seeking donations and marketing for the College; and
- to satisfy the College's legal obligations and allow the College to discharge its duty of care.

In some cases where the College requests personal information about a student or Parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

Job Applicants, Staff Members and Contractors

In relation to personal information of job applicants, staff members and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

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

- in administering the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking donations and marketing for the College; and
- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

Volunteers

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities (such as parents associations or past students organisations) to enable the College and the volunteers to work together.

Marketing and Fundraising

The College may engage in marketing and fundraising as a means to promote future growth and sustain and improve the educational environment for students. Personal information held by the College may be used to make a marketing or fundraising appeal and be disclosed to organisations that assist in the College's marketing or fundraising activities (for example: College parents association; past students organisations; or, on occasions, external fundraising organisations).

Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications like newsletters and magazines, which include personal information, may be used for marketing purposes.

Photographs and Video Images of Students

Photographs and video images of students are used regularly by the College for a number of educational and related purposes. Photographs or video images of student activities may be included in College newsletters, magazines, postings on noticeboards, classroom learning activities and school functions or events. These are a reasonably expected use of student images when enrolling at a school.

The College will obtain separate permission from a student's parent or guardian prior to the use of photographs or video images of that student for direct marketing or fundraising purposes.

Any photographs or video images taken by families at school functions or events must be for their personal use only and not posted in any public places outside of the College.

Parents should immediately notify the College Principal in writing if any circumstance arises that would prevent the College from using their student's photograph or video images as outlined above.

Who might the College disclose Personal Information to?

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

- another school or College;
- government departments;
- medical or healthcare practitioners;
- people providing services to the College, including specialist visiting teachers, counsellors and sports coaches;
- recipients of College publications, such as newsletters and magazines;
- Parents;
- anyone you authorise the College to disclose information to; and
- anyone to whom we are required to disclose the information to by law.

An individual CCM school or centre may disclose personal information to the CCM Central Office for administrative and management purposes including insurance, fees management (including debt collection), child protection and professional standards.

Sending Information Overseas

The College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange or College supervised tour or mission trip. However, the College will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The College may use computerised record systems which store personal information in the 'cloud', which may mean the information resides on data storage servers that are situated outside Australia.

How does the College treat Sensitive Information?

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

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

Quality and Security of Personal Information

The College endeavours to ensure that the personal information it holds is accurate, complete and up to date. The College will take all reasonable steps to:

- protect personal information from misuse, interference, loss, unauthorised access, modification or unauthorised disclosure; and
- destroy or de-identify information that is no longer needed.

Access and Correction of Personal Information

Under the Commonwealth *Privacy Act*, an individual has the right to obtain access to any personal information which the College holds about them and to advise the College of any perceived inaccuracy. 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 or update any personal information the College holds about you or your child, please contact the College Principal in writing. The College may require you to verify your identity and specify what information you require. The College may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

Consent and Rights of Access to the Personal Information of Students

The College respects every Parent's right to make decisions concerning their child's education.

Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. The College will treat consent given by Parents as consent given on behalf of the student, and notice to Parents will act as notice given to the student.

As mentioned above, parents may seek access to personal information held by the College about them or their child by contacting the College Principal. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the College's duty of care to the student.

The College may, at its discretion, on the request of a 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 so warranted.

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 College Principal. 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.

Current contact details are on the website of each CCM college (www.ccmschools.edu.au/our-colleges).

APPENDIX 1

Standard Collection Notice

1. The 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 College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to provide schooling to the student and to enable them to take part in activities of the College.
2. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts, and child protection and public health laws.
4. Health information about students is sensitive information within the terms of the Australian Privacy Principles under the *Privacy Act*. We may ask you to provide medical reports about students from time to time.
5. The College from time to time discloses personal and sensitive information to others for administrative and educational purposes, including to facilitate the transfer of a student to another school. This includes to other Colleges or schools, government departments, CCM Central Office, medical practitioners, and people providing services to the College (including specialist visiting teachers, sports coaches, volunteers and counsellors).
6. Personal information collected from students is regularly disclosed to their parents or guardians.
7. The College may store personal information in the 'cloud' which may mean that it resides on servers which are situated outside Australia.
8. The College's Privacy Policy sets out how parents or students may seek access to personal information collected about them. However, there will be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the student, or where students have provided information in confidence.
9. The College Privacy Policy also sets out how you may complain about a breach of privacy and how the College will deal with such a complaint.
10. The College may from time to time engage in fundraising activities. Information received from you may be used to make an appeal to you. It may also be disclosed to organisations that assist in the College's fundraising activities solely for that purpose. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
11. Information such as academic or sporting achievements, student activities and similar news may on occasions be published in College newsletters, magazines and websites. Photographs or video images of student activities such as sporting or cultural events, camps and excursions may be taken for publication in College newsletters, magazines and websites. Parents are to confirm with the College in writing if information or images regarding their student is not to be used in this manner.
12. The College will obtain separate permissions from the students' parent or guardian prior to the use of photographs or video images of that student for direct marketing or fundraising purposes.
13. If you provide the College with the personal information of others, such as doctors or emergency contacts, we encourage you to inform them that you are disclosing that information to the College and why, that they can access that information if they wish and that the College does not usually disclose this information to third parties.

APPENDIX 2

Employment Collection Notice

1. In applying for an employment position you will be providing the College with personal information. The College's current contact details are on the employment application form and available from the College website.
2. If you provide personal information with your application (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. This assessment may include sharing your personal information with Christian Community Ministries central office or other colleges. We may keep your personal information on file if your application is unsuccessful in case another position becomes available.
3. The College's Privacy Policy contains details of how you may complain about a breach of the Australian Privacy Principles or how you may seek access to personal information collected about you. However, there may be occasions when access is denied. Such occasions would include where access would have an unreasonable impact on the privacy of others.
4. We will not disclose your personal information to a third party without your consent. If you provide contact details of a third party (such as a referee) as part of your application, you consent to the College contacting that third party and disclosing personal information as part of assessing your application for employment.
5. We may be required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an apprehended violence order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. The College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
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, that they can access that information if they wish and that the College does not usually disclose the information to third parties.

APPENDIX 3

Contractors and Volunteers Collection Notice

1. In applying to provide services to the College, you will be providing the College with personal information. The College's current contact details are on application forms and available from the College website.
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. This assessment may include sharing your personal information with Christian Community Ministries central office or other colleges. We may also make notes and prepare a confidential report in respect of your application.
3. You agree that we may store this information for the period of your contract or volunteer service provision to the College and as reasonably required thereafter.
4. The College's Privacy Policy sets out how you may seek access to your personal information and how you may complain about a breach of the APPs.
5. We will not disclose your personal information to a third party without your consent. By providing contact details for a third party (such as a referee) as part of your application, you consent to the College contacting that third party and disclosing personal information as part of assessing your application for employment.
6. We may be required to conduct a criminal record check and collect information regarding whether you are or have been the subject of an apprehended violence order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.
7. The College may store personal information in the 'cloud', which may mean that it resides on servers which are situated outside Australia.
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, that they can access that information if they wish and that the College does not usually disclose the information to third parties.