

Canterbury College Privacy Policy

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1. Purpose and Objectives

The aims of this Policy are to:

- a) ensure Canterbury College complies with its obligations under the *Privacy Act 1988 (Cth)* (Privacy Act), including the Australian Privacy Principles (APPs);
- b) outline how Canterbury College manages and secures personal information in its control;
- c) describe the kinds of personal information that Canterbury College holds and for what purposes, as well as how that information is collected, held, used, and disclosed;
- d) advise how to request and / or update information under this Policy;
- e) set out who to contact to address privacy concerns.

2. Definitions, Terms, Acronyms

Canterbury College / the School	Canterbury College Ltd or any controlled entities of Canterbury College Ltd.
Employee	'an individual who works for or has previously worked for Canterbury College in return for compensation, typically defined by an employment contract, which outlines the duties, responsibilities, and rights of both parties.
Employee Record	As defined in the Act.
Student	Includes prospective, current or past students enrolled at the School
Personal Information	Information or an opinion, whether true or not, and whether recorded in material form or not, about an identified individual or an individual whose identity is reasonably apparent, or can be determined, from the relevant information or opinion.
Sensitive Information	A type of personal information. It includes information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preference or practice, or criminal record. Sensitive information also includes biometric information that is used for the purpose of automated biometric verification, biometric identification or biometric templates.
Health Information	A subset of sensitive information. It is information or an opinion about the health or disability of an individual and information collected to provide, or in providing a health service.

3. Policy Scope/Coverage

This Policy applies to board members, employees, job applicants, prospective, current and past students as well as their parents / carers. The scope extends to further cover donors, sponsors, volunteers, and any other person whose personal information is collected by or provided to Canterbury College due to their interaction with the College.

The APPs do not apply to an employee record where the personal information is released for a purpose directly related to the employment relationship between the College and employee.

4. Policy Statement

Canterbury College deals with personal information on a daily basis in order to exercise its educational function and activities, and to fulfil its relevant duties and obligations required. Due to the confidential nature of personal information and the consequences flowing from inappropriate use of such information, Canterbury College is committed to protecting the personal information it collects, uses, stores and discloses in line with the Privacy Act.

4.1 Types of personal information that we collect and hold

The College may collect the following types of personal information:

a) General personal information

Canterbury College may collect and hold personal information such as:

- i. identification information, including your name, date of birth contact details, drivers licence number, and tax file number;
- ii. financial details;
- iii. any other information that is necessary to provide you with our services.

b) Sensitive information

The College will only collect sensitive and health information about you where the information is authorised to be collected by law, or with your consent where that information is reasonably necessary for our functions as per APP3.

4.2 Collecting your information

As a general principle, the College will not mandate that you provide your or your child's personal information. However; if you choose not to provide the College with the requested information the College's may not be able to provide or continue to provide you with the services or engagement you require.

4.2.1 Collecting personal information

Canterbury College will always, if it is reasonable and practical to do so, collect personal information directly from you through secure means.

The College may collect your personal information when:

- i. you are employed with Canterbury College;
- ii. you are engaged in the provision of contracts for service;
- iii. you fill out a form, contract, or other formal documentation;
- iv. you give the College paper correspondence (e.g. letter or notice);
- v. you give the College information over the telephone or post;

- vi. you interact with the College electronically, via our client portal or in person;
- vii. you access the College website; and
- viii. Canterbury College provides services to you.

4.2.2 Students and parents/carers

In relation to the personal information of students and their parents / carers, the College's primary purpose of collection is to enable the College to provide education, including support services, to students enrolled at the College, exercise its duty of care and perform necessary associated administrative activities, which will enable students to take part in all the activities of the school.

The purposes for which the College uses the personal information of students and parents/ carers include:

- a. to communicate matters relating to the Student's education to their parents/ carers via written correspondence and online publications;
- b. the day-to-day administration of the College;
- c. looking after students' educational, social and medical wellbeing;
- d. to monitor adherence to other College policies;
- e. to satisfy the College's legal obligations to discharge its duty of care;
- f. to satisfy the College service providers' legal obligations;
- g. To stay in touch and facilitate contact between present and past cohorts.

4.2.3 Job applications and contractors

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

The purposes for which the College uses the personal information obtained includes:

- a. administering the individual's employment contract;
- b. for Insurance purpose;
- c. satisfying the College's legal obligations, for example in relation to child protection

4.2.4 Volunteers

The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities. The purpose for which the College uses the personal information of volunteers includes:

- a. Enabling the College to manage the engagement process of volunteers;
- b. For insurance purposes;
- c. Satisfying the College's legal obligations for example, in relation to child protection;

- d. To confirm the suitability and to manage visits.

4.2.5 Collecting personal information from other sources

Sometimes the College may collect personal information about you from other sources where it is necessary to do so. This may happen where:

- a. you have consented to the collection of the information from someone else;
- b. The College is required or authorised by law to collect the information from someone else; or
- c. it is unreasonable or impracticable to collect the information from you personally.
- d. Examples of other sources that the College may collect personal information from include, but are not limited to:
 - i. accessing information that is publicly available;
 - ii. authorised representatives, including any person who has authority to act on your behalf;
 - iii. your business partners or related entities;
 - iv. your family members, medical advisors, current and former employers;
 - v. regulatory authorities;
 - vi. professional advisers;
 - vii. insurance companies;
 - viii. banks and financial institutions;
 - ix. Work Cover;
 - x. Medicare, Centrelink, Australian Tax Office; and
 - xi. government departments and government agencies.

4.2.6 Unsolicited personal information

Where Canterbury College is provided with personal information without having sought it, Canterbury College will destroy the information or de-identify the information provided it is lawful and reasonable to do so unless.

- a. The College could have collected the personal information; and
- b. the information is contained in a Commonwealth record,

4.2.7 Notification of collection of personal information

When the College receives personal information directly from a third party, it will take reasonable steps to notify you of the collection and the circumstances that surround the collection. Sometimes:

- a. the College will collect your personal information from third parties; or
- b. you may not be aware that the College has collected your personal information.

4.3 Protecting Personal Information

4.3.1 Storing personal information

- a. Canterbury College stores your personal information in a variety of formats, including in physical and electronic forms.
- b. Canterbury College treats all personal information as confidential. As such the College takes all reasonable steps to ensure personal information is protected from:
 - o misuse, interference, and loss; and
 - o unauthorised access, modification, and disclosure.

4.3.2 How we store your information

Some of the ways Canterbury College takes reasonably practicable measure to securely store your information are:

- a. imposing confidentiality obligations for staff with access to personal information;
- b. ensuring personal information is only accessible on a need-to-know basis;
- c. maintaining document storage facilities on premises and offsite;
- d. training staff on their obligations with respect to personal information;
- e. implementing policies and procedures regarding the access and appropriate use of personal information;
- f. ensuring secure databases and applications at the premises and offsite, including those accessed via the internet;
- g. ensuring security measures for access to systems;
- h. ensuring control of access to premises.

4.3.3 What happens if we no longer need your personal information

If Canterbury College no longer needs your personal information for any purpose, the College will take reasonable steps to destroy or permanently de-identify the information, unless:

- a. the information is contained in a Commonwealth record; or
- b. we are required by law, or a court/tribunal order, to retain the information.

4.3.4 Quality of information and security

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:

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

4.4 Use and disclosure of information

4.4.1 Use and disclosure of personal information

Canterbury College will not use or disclose personal information we hold about you that was collected for a particular purpose unless:

- a. you have consented to the use or disclosure of the information for another purpose;
- b. it becomes necessary to lessen or prevent a serious and imminent threat to life, health or safety; or
- c. the use or disclosure is otherwise permitted under the Privacy Act (e.g. you would reasonably expect us to use or disclose the information for another purpose or the use or disclosure of the information is required or authorised by law or a court/tribunal order).

4.4.2 Disclosure to third parties

Sometimes the College may disclose personal information about you to third parties. Examples of third parties that it may disclose your personal information to include, but are not limited to:

- a. authorised representatives, including any person who has authority to act on your behalf;
- b. subject to our professional obligations, any person where necessary to perform our services, including regulatory authorities and financial institutions;
- c. its external service providers and professional advisors so that they can provide financial, administrative, or other services in connection with our services, including but not limited to, financial institutions, auditors, insurers, information technology service providers, and photocopy and archive service providers;
- d. debt collection agencies mandated by the College; and
- e. any other person where you have given your consent.

4.4.3 Overseas recipients

Canterbury College may need to disclose your personal information to recipients outside Australia in limited circumstances. This would include the use of technology providers where we store personal information, and which are situated outside of Australia and could include jurisdictions such as Singapore, Hong Kong, Canada, the United Kingdom and the United States of America.

4.4.4 Disclosures

Where your personal information is disclosed, the College will:

- a. take reasonable steps to ensure the recipient does not breach the APPs, unless an exception in the Privacy Act applies; and
- b. seek to ensure that information is used, held, and disclosed consistently with the Privacy Act and any other applicable laws.

4.5. Ongoing Monitoring

4.5.1 Direct marketing and Fundraising

Canterbury College may use or disclose your personal information (excluding sensitive information) for direct marketing or fundraising purposes, including but not limited to, providing you with information about changes in its services, products and / or events that may interest you.

4.5.2 Sensitive information

The College will not use or disclose your sensitive information for any purpose of direct marketing or fundraising unless you have consented to the information being used or disclosed for.

4.5.3 Method of direct marketing

The College may conduct direct marketing via email, telephone, post, in person, our School portal or any other electronic means.

You may opt out at any time via the opt-out mechanism contained in our correspondence, or by contacting our Privacy Officer and we will process your request withing a reasonable time.

4.6 Quality of personal information

Canterbury College will take reasonable steps to ensure that any personal information it collects, uses, or discloses is accurate, complete, up to date, and relevant to its functions and activities.

If you believe that your personal information is not accurate, complete or up to date, please contact the Privacy Officer.

4.7 Access to personal information

4.7.1 Requesting access

Individuals have the right to access and request correction of their personal information held by the College. You may at any time request access to personal information the College holds about you. The College will give you access to that information, unless an exception in the Privacy Act applies.

Requests for access or correction should be made in writing to the nominated Privacy Officer.

4.7.2 Dealing with access requests

Canterbury College will respond to a request for access within 30 days), and give you access in the manner you request, if it is reasonable and practicable to do so.

The College may need to verify your identity before it gives you access to your personal information.

4.7.3 Refusal to give access

If the College refuse to give you access, it will:

- a. take reasonable steps to give you access in a manner that meets its needs as well as yours; and
- b. provide you with the reasons for our decision as required by the Privacy Act.

4.8 Correcting personal information

4.8.1 Requesting correction

If you think that any personal information that the College holds about you is incorrect, inaccurate, out of date, incomplete, irrelevant, or misleading you may request the College to correct the information by contacting the Privacy Officer.

4.8.2 Correcting information

Canterbury College will take reasonable steps to correct that information.

4.8.3 Dealing with correction request

- a. The College will respond to a correction request within 30 days;
- b. The College may need to verify your identity before it corrects your personal information.

4.8.4 Notification of correction to third parties

If the College corrects your personal information that it has previously disclosed to another entity, and you ask the College to tell the other entity about the correction, it will take reasonable steps to tell the other entity about the correction, unless it is impractical or unlawful to do so.

4.8.5 Refusal to correct information

If the College refuses to correct the personal information, it will provide you with the reasons for our decision as required by the Privacy Act.

4.9 Responding to data breaches

Canterbury College will take appropriate, prompt action if the College has reasonable grounds to believe that a data breach may have or is suspected to have occurred. Depending on the type of data breach, this may include a review of its internal security procedures, taking remedial internal action, notifying affected individuals and the Office of the Australian Information Commissioner (OAIC).

If the College is unable to notify individuals, it will publish a statement on our website and take reasonable steps to publicise the contents of this statement.

4.10 Retention of information

Personal information is retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by law. Once no longer needed, the College will ensure that information is securely destroyed or anonymised.

4.11 Anonymity

You may remain anonymous or to use a pseudonym when dealing with the College where it is lawful and practical to do so. This may include when making an enquiry, complaint or providing feedback; however, this will prevent the College from responding to you directly.

4.12 Government related identifiers

In certain circumstances the College may be required to collect government-related identifiers such as your tax file number, Medicare number, Centrelink reference number, drivers licence number, passport number, and individual healthcare identifiers.

Canterbury College will not use or disclose this information unless the use or disclosure is permitted under the Privacy Act.

4.13 Complaints about personal information

4.13.1 Complaints

- a. If you have any issues about the way the College handles your personal information after reading this policy, become aware of a potential breach of privacy, or wish to make a complaint, please contact our Privacy Officer.
- b. Complaints can be made in writing or orally to:

Privacy Officer: The Risk and Compliance Officer

Telephone: 0732 990 825

Mail: PO Box 616, Beenleigh, Queensland, 4207, Australia

Email: complimanager@cc.qld.edu.au

4.13.2 External complaint mechanism

- a. If you are not happy with the outcome of the Privacy Officer's investigation or we have not replied to you within a reasonable time, then you can raise your concern with the Office of the Australian Information Commissioner (OAIC).
- b. Complaints can be made to OAIC in the following ways:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.com.au

Mail: Office of the Australian Information Commissioner

GPO Box 5218 Sydney NSW 2001

Online: <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/>

5. Review

This policy and its associated procedures, quick reference guides and protocols will be reviewed every two years. Canterbury College, however, reserves the right to review this policy at any time.

Version Number:	Version 1.012024
Policy Library:	College Governance
Responsible Officer	The Board
Approval Authority:	Principal
Last Approval Date:	August 2024
Review Date:	August 2026
Related Policies/Procedures:	Canterbury College Code of Conduct, Recruitment and Selection Policy, Protecting Children in Anglican Education Policy, Guidelines and Procedures, Complaints and Staff Grievance, Conflict and Compliant Resolution Policy and Procedures
Acknowledgements:	Privacy Act 1988 (Cth) ASC Recruitment and Selection Policy, Age Discrimination Act 2004, Disability Discrimination Act 1992, Workplace Gender Equality Act 2012, Sex Discrimination Act 1984, Fair Work Act 2009, Anti-Discrimination Act 1991, Working with Children (Risk Management and Screening) Act 2000 Education (Queensland College of Teachers) Act 2005.

6. Appendices

Appendix 1 – Standard Collection Notice

Appendix 2 - Employment Collection Notice

APPENDIX 1**Standard Collection Notice**

1. The School collects personal information, including sensitive information about students and parents or carers before and during the course of a student's enrolment at the School. This may be in writing or during conversations. The primary purpose of collecting this information is to enable the School to provide education 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.
2. 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.
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 Public Health and Child Protection laws.
4. 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 provide medical reports about students from time to time.
5. The School may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
 - a. other schools and teachers at those schools;
 - b. government departments (including for policy and funding purposes);
 - c. Anglican Schools Commission;
 - d. medical practitioners;
 - e. people providing educational, support and health services to the School, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
 - f. providers of learning and assessment tools;
 - g. 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);
 - h. people providing administrative and financial services to the School;
 - i. anyone you authorise the School to disclose information to; and
 - j. anyone to whom the School is required or authorised by law, including child protection laws, to disclose the information.
6. Personal information collected from students is regularly disclosed to their parents or carers.
7. 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 server which may be situated outside Australia.
8. The School's Privacy Policy, accessible on the School's website, sets out how parents or carers 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.
9. The School's Privacy Policy also sets out how parents or carers and students can make a complaint about a breach of the APPs and how the complaint will be handled.

10. The School may engage in fundraising activities. Information received from you may be used to make an appeal to you. We will not disclose your personal information to third parties for their own marketing purposes without your consent.
11. 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. The School will obtain permissions annually from the student's parent or carer (and from the student if appropriate) if we would like to include such photographs or videos or other identifying material in our promotional material or otherwise make this material available to the public such as on the internet.
12. We may include students' and students' parents' contact details in a class list and School directory.
13. If you provide the School 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 School and why.

APPENDIX 2

Employment Collection Notice

1. In applying for this position, you will be providing Canterbury College with personal information. We can be contacted at:
 - a. +61 7 3299 0888,
 - b. people@canterbury.qld.edu.au
 - c. 182 Old Logan Village Road Waterford QLD 4133 AUS
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 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 School's Privacy Policy, accessible on the School'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 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 or to support vendors that provide services around our recruiting and staff administration systems.
5. We may conduct a criminal record check collect information as well as collect personal information about you in accordance with our Child Protection duties.
6. 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 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 server which may be 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 School and why.