



Privacy Policy

Version 4.1

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Policy Pertains to:	School Board; Senior Executive; All staff; Parents & students; Volunteers; Contractors; other individuals or entities whose personal information the school may collect or hold

Version	Date	Notes
4.1	February 2026	Addition of reference to AI



Version History

Version	Date	Notes
1.0	15-11-05	Draft Document for Board Approval
2.0	03-03-06	Updated Policy
2.1	04-11-08	Policy Review and re-issue
2.2	03-08-09	Reviewed and re-issued
2.3	22-09-10	Reviewed and re-issued
3.0	14-09-16	Reviewed and updated
4.0	February 2018	Adopted current CEN Hub Policy
4.1	February 2026	Addition of reference to AI

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VISION STATEMENT

A Christ centred learning community exploring and impacting on God's world

MISSION STATEMENT

To assist parents in the nurture of their children, by providing a Christ-centred, biblically grounded, academically rigorous and culturally relevant education that instils a sense of identity, purpose and hope in students that equips them to live for God's glory.

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Important related documents:

Enrolment Policy	Child Safe Framework
Employment Policy	WHS Policies
Digital Device & Online Services inc mobile phones Policy	Complaints Framework

Relevant Legislation:

The Privacy Act 1988 (Cth)
Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
Health Records and Information Privacy Act 2002 (NSW)
Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth)

Other References:

'Privacy Compliance Manual', Independent Schools Council of Australia and National Catholic Education Commission, January 2018, used by permission
Office of the Australian Information Commissioner www.oaic.gov.au – further information
Australian Privacy Principles Guidelines, OAIC, 31 March 2015 Ed., *check website for latest information*
Sample Privacy Policy - AIS Schools

1 INTRODUCTION

The School is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988, other Commonwealth and State privacy legislation, and follows 'Guidelines' as issued by the Office of the Australian Information Commissioner.

The School reserves the right to review and update this Privacy Policy in accordance with new laws and technology, changes to the School's operations and practices, and to make sure it remains appropriate to the changing school environment.

2 CHRISTIAN RATIONALE

Richmond Christian College acknowledges its responsibility before God to care for and protect the children, families and others who trust the School to carry out those responsibilities with love and respect. *(Love) always protects, always trusts, always hopes, always perseveres.* (1 Corinthians 13:7)

The School respects the privacy of individuals and families and places a high priority on integrity in its handling of information provided to the School. It seeks to protect the rights of all people who provide information to the school, in accordance with relevant legislation.

The School honours the Commonwealth and State laws which circumscribe the collection, storage and dissemination of information provided to it.

3 PURPOSE OF THIS DOCUMENT

This document sets out the policies and procedures of Richmond Christian College in relation to how the School uses and manages the personal information provided to, or collected by, it for the well-being of students in its care and for the reasonable functions of the school.

4 TABLE OF RESPONSIBILITIES

<i>Responsibilities</i>	<i>Evidence of Compliance</i>
Principal/Privacy Officer	
Ensure the implementation of this policy within the school	PD Program & Calendar
Ensure procedures are maintained for the proper collection, storage and use of information	Privacy Procedures
Ensure procedures are maintained for complaints, access & enquiries regarding Personal Information held by the school	Privacy Procedures
Procedures for collection, storage, disclosure of Personal Information and Sensitive Information	Privacy Procedures PD Program & Calendar
Authorisation of staff to access records	IT Access Records
Maintenance of cybersecurity measures	Security protocols/ software
Staff training in information handling	Records of staff PD
Investigation of data breaches	Privacy Breach Register; Records of investigation
Notification re: Eligible Data Breaches	Records of notification/ communications
Investigation of complaints about privacy matters	Complaint Register
Ensure review of privacy procedures & PI held by school	Records of review/ audit
All staff	
Compliance with policy and procedures for collection, storage, access and disclosure of Personal Information and Sensitive Information	Annual PD Register Breach of Compliance Register
Each new staff member must, as part of their contract of employment, agree to the terms of this policy.	Staff Employment Files

5 DEFINITIONS

- **AI** – Artificial Intelligence
- **Australian Privacy Principles (APPs)** – legally binding principles which are the cornerstone of the privacy protection framework in the Privacy Act.
The APPs are structured to reflect the personal information lifecycle:
Part 1 – Consideration of personal information privacy (APP 1,2)
Part 2 – Collection of personal information (APP 3,4,5)
Part 3 – Dealing with personal information (APP 6,7,8,9)
Part 4 – Integrity of personal information (APP 10,11)
Part 5 – Access to, and correction of, personal information (APP 12,13)
- **‘Personal Information’** – information or an opinion, whether true or not, about an individual whose identity is apparent, or can reasonably be inferred from, the information or opinion, whether the information is recorded in a material form or not. It includes all personal information, regardless of its source.
- **‘Sensitive Information’** – personal information that is given extra protection and must be treated with additional care. It includes any information or opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, membership of a professional or trade association, philosophical beliefs, membership of a trade union, sexual orientation or practices, or criminal record. It also includes health information.
- **‘Health Information’** – information or an opinion about: the health or disability (at any time) of an individual; an individual’s expressed wishes about the future provision of health services to him/ her; a health service provided, or to be provided, to an individual.
- **‘Records’** – The Privacy Act regulates personal information contained in a ‘record’. It includes a ‘document’ or an ‘electronic or other device’. It covers a wide variety of material. A ‘document’ includes anything on which there is any writing, anything from which sounds, images or writings can be reproduced, drawings or photographs.
It excludes a generally available publication (e.g. a telephone directory); or anything kept in a library, art gallery or museum for the purposes of reference, study or exhibition.
- **‘The School’** – Richmond Christian College
- **‘Eligible Data Breach’** – Under the Notifiable Data Breach Scheme an Eligible Data Breach occurs when 3 criteria are met:
 - there is unauthorized access to, or unauthorized disclosure of, personal information, or a loss of personal information, that an entity holds
 - this is likely to result in serious harm to one or more individuals, and
 - the entity has not been able to prevent that likely risk of serious harm with remedial action. (Also referred to as ‘Notifiable Data Breach’)
- **‘Serious harm’** – can be psychological, emotional, physical, reputational or other forms of harm
- **‘Remedial action’** – action taken to prevent unauthorized access or disclosure of personal information

- if remedial action prevents the likelihood of serious harm occurring, the breach is not an eligible data breach
- for breaches where personal information is lost, remedial action is adequate if it prevents the unauthorized access or disclosure of personal information.

6 POLICY

- (a) The school's handling of the personal information it collects and holds (including sensitive and health information) is governed by the Australian Privacy Principles and other requirements of legislation and regulators.
- (b) The school is committed to protecting the rights to privacy of all stakeholders in its handling of personal information. Exception: where other legislative requirements take precedence e.g. child protection investigation processes.
- (c) The school is committed to providing an excellent standard of student welfare and education. The information it collects is primarily for the purpose of running, and managing the responsibilities of, a school.
- (d) The school is committed to rapid and effective response in the event of a data breach; and in accordance with the requirements of the Notifiable Data Breach scheme.
- (e) The school is committed to continual improvement of its practices in the protection of the personal information it holds.

7 COLLECTION OF INFORMATION

7.1 Collection of Personal Information

The School collects and holds information including (but not limited to) personal information, including health and other sensitive information, about:

- Students and parents/ guardians before, during and after the course of a student's enrolment at the School including:
 - ◇ name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
 - ◇ parents' education, occupation, language spoken at home, nationality and country of birth;
 - ◇ health information (e.g., details of disability and/or allergies, dietary requirements, absence notes, immunisation details, medical reports, letters of diagnosis or specialist reports, and names of doctors);
 - ◇ results of assignments, tests and examinations;
 - ◇ conduct and complaint records, or other behavioural and wellbeing notes, and school reports;
 - ◇ information about referrals to government welfare agencies;
 - ◇ counselling reports;
 - ◇ health fund details and Medicare number;
 - ◇ any Family Court orders;
 - ◇ criminal records;
 - ◇ any personal information collected by or generated through the use of an AI system
 - ◇ volunteering information; and
 - ◇ photos and videos at School events;
- Job applicants, staff members and their families, volunteers and contractors including:
 - ◇ name, contact details (including next of kin), date of birth, and religion;
 - ◇ information on job application;
 - ◇ professional development history;
 - ◇ salary and payment information, including superannuation details;
 - ◇ health 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;
 - ◇ any personal information collected by or generated through the use of and AI system
 - ◇ workplace surveillance information; and
 - ◇ work emails and private emails (when using work email address) and Internet browsing history; and
- Other people who come into contact with the School, including name and contact details and any other information necessary for the particular contact with the School.

(a) Collection from the individual

Where possible, the school collects information from the individual concerned.

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

- (b) Personal information provided by an individual: Generally collected by way of forms, face-to-face meetings, interviews, emails and telephone calls.
- (c) Personal information provided by other people: In some circumstances the School may be provided with personal information about an individual from a third party, e.g. a report from a health care 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/s to facilitate transfer of the student.
- (d) The School 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 above.
- (e) The School may collect personal information through surveillance activities (such as CCTV security cameras) and student email/device monitoring.
- (f) Exception in relation to employee records: Under the Privacy Act the Australian Privacy Principles and Health Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the School's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the School and employee.

7.2 Need to Advise

Before information is collected, or as soon as practicable afterwards, the School will make the individual to whom the information relates aware of the following:

- The fact that information is being collected
- The purpose for which the information is being collected
- The intended recipients of the information
- Whether the supply of information by the individual is required by law, or is voluntary; and any consequences for the individual if the information is not provided, or part not provided
- The existence of any right of access to, and correction of, the information

This information is outlined in the 'Standard Collection Notice'; 'Contractor/ Volunteer Collection Notice' and 'Employment Collection Notice'.

8 USE AND DISCLOSURE OF PERSONAL INFORMATION

8.1 Use of the Personal Information Provided to the School

The School will use personal information provided to it for the primary purpose of collection; and for related secondary purposes which may be reasonably expected, or to which you have consented.

(a) Students and Parents/ Guardians

The School's primary purpose of collection of personal information is to enable the School to provide schooling for the student. This includes satisfying both the needs of parents/ guardians, the needs of the student and the needs of the School throughout the whole period the student is enrolled at the School.

The purposes for which the School uses this personal information include:

- To keep parents informed about matters relating to the child's schooling, through correspondence, reports, newsletters and magazines
- Day-to-day administration
- The student's educational, social and medical well-being
- Seeking donations and marketing for the School
- To satisfy the School's legal obligations and allow the School to discharge its duty of care
- Complying with Federal and State reporting requirements
- Investigating incidents or defending any legal claims against the School, its services or staff
- Celebrating the efforts and achievements of students

Where the School requests personal information about a pupil or parent/ guardian, which is not provided, the School may not be able to enrol or continue the enrolment of the student or permit the student to take part in a specific activity.

(b) Job applicants, staff members and contractors

The School requests personal information for:

- Assessing suitability for employment, to engage an employee or contractor
- Administration of the individual's contract or employment
- Insurance purposes, such as public liability or Work Cover
- Satisfying the School's legal obligations, e.g. in relation to child protection legislation
- Investigating incidents, or defending legal claims about the School, its services or staff
- Seeking donations, and marketing of the School

(c) Volunteers

The School obtains personal information about volunteers who assist the School in its functions, or conduct associated activities, to enable the School and the volunteers to work together.

(d) Marketing and Fundraising

The School treats marketing and seeking donations for the future growth and development of the School, as an important part of ensuring that the School continues to be a quality learning environment in which both students and staff thrive.

Personal information held by the School may be disclosed to an organising group that assists in the School's fundraising

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

(e) 'Do Not Publish'

The school creates opportunities for parents to choose for their child's or family's information to NOT be published. E.g. photos/ videos; Yearbook

Parents may inform the school during the enrolment process, at annual update of information, or at any time by advising the school of withdrawal of consent.

8.2 Disclosure of Personal Information

- (a) The School may disclose personal information, including sensitive information, held about an individual to:
- Other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
 - Distance Education providers e.g. TAFE, where students are enrolled as part of their study at the school
 - 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); Government departments
 - Medical practitioners
 - Service providers to the School, e.g. visiting specialist teachers, music tutors; finance services
 - providers of specialist advisory services and assistance to the School, including in the area of Human Resources, child protection, students with additional needs and for the purpose of administering Google Apps for Education and ensuring its proper use (see further the section below 'Sending and storing information overseas');
 - providers of learning and assessment tools;
 - AI services for the purpose of collating and generating data and reports.
 - Agencies and organisations to whom we are required to disclose personal information for education, funding and research purposes;

- those providing administrative and financial services to the School;
- The provider of the School's Student Management Systems;
- Recipients of School publications, such as newsletters and magazines; Yearbook
- Parents of the student enrolled; unless a Court Order limiting access by one parent is received by the school
- Anyone personally authorised by the parents/ guardians of the student
- Anyone to whom the School is required to disclose information to by law
- Class Parents providing communication to families within their child's class (Pre-Kindy to Year 6)

8.3 How We Store Personal Information

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

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. See further the section below 'Sending and storing information overseas.'

8.4 Sending and Storing Information Overseas

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

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 and provide technical support. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's servers which may be situated outside Australia.

An example of such a cloud service provider is Google. Google provides the 'Google Apps for Education' (GAFE) including Gmail, and stores and processes limited personal information for this purpose. School personnel and the ISNSW and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g., instant messaging), documents and associated administrative data for the purposes of administering GAFE and ensuring its proper use.

8.5 Handling of Sensitive Information

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

9 MANAGEMENT OF PERSONAL INFORMATION

The school takes all reasonable steps to make sure that the personal information it collects and stores is accurate, up-to-date, complete, relevant and not misleading.

9.1 Access and Correction of Personal Information

An individual has the right under the Privacy Act to obtain access to any personal information which the School holds about them; and to advise the School of any perceived inaccuracy and to seek correction to their information.

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.
- The School endeavours to ensure that the personal information it holds is accurate, complete and up-to-date.
- Personal information may be accessed or updated by contacting the School in writing. The School will require you to verify your identity and specify what information you require.
- If the information sought is extensive, the School may require a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested.
- The School will not store personal information longer than necessary.

9.2 Denial of Access to Personal Information

If the school cannot provide access to the information required, the school may be able to provide a format of information that protects the privacy of other individuals.

A written notice explaining the reasons for a refusal will be provided.

Access to personal information will be denied in all cases such as where:

- It would pose a serious or imminent threat to the life or health of an individual
- Release may result in a breach of the School's duty of care to the student
- It would have an unreasonable impact on the privacy of other individuals
- It is likely to prejudice the prevention, detection, investigation, prosecution or punishment of an unlawful activity, the activities of a law enforcement agency, or legal proceedings
- The request is frivolous or vexatious
- The information relates to existing or anticipated legal proceedings between the parties, and the information would not be accessible through legal procedures
- Providing access would be unlawful
- Denying access is required or authorized by or under law

9.3 Consent and Rights of Access to the Personal Information of Students

The School respects every parent's right to make decisions concerning their child's education.

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

The School may, at its discretion, on the request of a student, grant that student access to information held by the School about them; or allow a student to give or withhold consent to the use of their personal information, independently of their parents/ guardians. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

9.4 Employment Records

Employee records and acts done by the School as the employer of staff, if directly related to a current or former employment relationship, are exempt from the application of the Privacy Act 1988.

Examples of this type of information include the terms and conditions of employment, personal contact details, performance and conduct and salary details.

Accordingly, the School may access and use personal information about employees when appropriate.

10 SECURITY OF PERSONAL INFORMATION

The School 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 permission based access rights to computerised records. (APP 11).

These steps include:

- Restricting access to information on the School 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.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- 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.
- Implementing physical security measures around the School buildings and grounds to prevent break-ins.
- Implementing, monitoring and reviewing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implementing, monitoring and reviewing human resources 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.
- 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.

The School's staff are required to respect the confidentiality of students' and parents' personal information, and the privacy of individuals.

10.1 Breach of Privacy

A breach of privacy may result from mishandling information according to the Australian Privacy Principles.

A data breach concerns the security of personal information: and involves the actual unauthorised access to, or disclosure of, personal information; or the loss of personal information where the loss is likely to result in unauthorised access or disclosure.

Causes may be malicious acts of third parties; human error; systems failure; or failure to follow information handling or data security measures resulting in accidental loss, access or disclosure.

- (a) If a data breach is suspected, or confirmed, the school shall take remedial action as soon as is practicable to contain and limit the data loss or access; and to minimise the chance of serious harm to any individual affected by the breach.
- (b) The school shall assess all suspected, or confirmed, data breaches to determine whether it is an Eligible Data Breach. (see 10.2)

Exception: If the remedial action contains or limits the data loss and potential harm to individuals, the data breach is not a 'Notifiable Data Breach'.

- (c) The school shall investigate the circumstances and take steps to address any issues and increase data security.

10.2 Notifiable Data Breaches

The Notifiable Data Breach (NDB) scheme (from 22 February 2018) gives increased confidence to individuals in the event of a breach of privacy, to be informed of that data breach and to have an opportunity to protect their interests.

- (a) The school shall act as soon as is practicable to prevent further loss of, or access to, the data.
- (b) In event of a NDB, the school shall notify all affected individuals, directly or indirectly, of the NDB as soon as is practicable.
- (c) In event of a NDB, the school shall prepare a statement of prescribed information regarding the eligible data breach for the Office of the Australian Information Commissioner (OAIC).
- (d) The school shall make the affected individuals aware of the contents of the statement to the OAIC.
- (e) The school shall take action to address the cause/s of any data breach against further loss of information.

11 COMPLAINTS

Any concerns about the way the School has handled the personal information it holds should be made in writing and directed to the Principal.

The School will investigate the complaint and will notify you of the decision in relation to your complaint as soon as practicable after it has been made.
(See also Complaints Framework; 'How to Make a Complaint' in Complaints Support Docs)

If the school is unable to resolve the complaint to your satisfaction, the matter may be referred to the Office of the Australian Information Commissioner (OAIC)

11.1 Enquiries

For further information about the way the School manages the personal information it holds, please contact the School.

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