



Privacy Policy

Purpose:	Kairos Community College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the school and describes how the school uses and manages personal information provided to or collected by it.	
Scope:	The policy applies to board members, employers, employees, volunteers, parents/guardians and students, contractors, and people visiting the school site; and describes the type of information the school collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.	
Status:	Approved	Last Reviewed: July 2025
Authorised by:	Kairos Community College Board	
References:	<i>Australian Privacy Principles</i> <i>Privacy Act 1988 (Cth)</i> <i>Kairos Community College Record Retention Schedule</i> <i>Kairos Community College Child Protection Policy</i> <i>Kairos Community College Student Disability Policy</i>	
Review Date:	Annually	Next Review Date: February 2027
Policy Owner:	Kairos Community College Board	

Exception in Relation to Employee Records:

Under the Privacy Act 1988 (Cth) (**Privacy Act**), the Australian Privacy Principles do not apply to an employee record held by the employing entity. As a result, this Privacy Policy does not apply to Kairos Community College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Kairos Community College and an employee.

Definitions

In this Privacy Policy, we observe the definitions as provided by the Privacy Act.

Personal information means information or opinion that is provided or recorded in any form and, whether true or not, about an individual whose identity is apparent, or can reasonably be determined

from the information or opinion. For example, this includes all paper and electronic records, photographic and video recordings.

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

Health Information is defined as including information or opinion about a person's physical, mental or psychological health, or disability, which is also classified as personal information. This includes information or opinion about a person's health status and medical history, whether recorded or not.

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.

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

Policy

Kairos Community College is committed to managing personal information as per the requirements of the Privacy Act 1988 (the Act), including the Australian Privacy Principles.

What personal information it is collected

The type of information Kairos Community 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 before, during and after the course of a student's enrolment at the School:
 - 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, absence notes, medical reports, immunisation details and names of doctors);
 - conduct and complaint records, or other behaviour notes, and school reports;
 - information about referrals to government welfare agencies;
 - counselling reports;
 - health fund details and Medicare number;
 - any court orders;
 - volunteering information; and
 - photos and videos at school events.
- job applicants, staff members, volunteers and contractors:
 - name, contact details (including next of kin), date of birth, and religion;
 - information on job application;
 - professional development history;
 - salary and payment information, including superannuation details;
 - medical information (e.g. details of disability and/or allergies, and medical certificates);
 - complaint records and investigation reports;
 - leave details;
 - photos and videos at school events;
 - workplace surveillance information;
 - work emails and private emails (when using work email address) and Internet browsing history

- other people who come into contact with the School including name and contact details and any other information necessary for the particular contact with the school.

How personal information is collected

Personal Information provided by students and families:

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

Personal Information provided by other people:

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

Personal information generated by artificial intelligence (AI) systems

Kairos Community College 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 under the heading 'What personal information is collected'.

Personal information from other sources

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

How personal information is used

Kairos Community College will use personal information it collects for the primary purpose of collection. personal information may also be used for a secondary purpose that is related to the primary purpose of collection, where this would be reasonably expected or has been consented to.

Students and Parents/Carers

In relation to personal information of students and parents, Kairos Community College's primary purpose of collection is to enable Kairos Community College to provide schooling to enrolled students, fulfil the school's legal obligations including duty of care and perform administrative activities. This includes satisfying the needs of students, parents/carers, Kairos Community College throughout the whole period the student is enrolled at the school.

In cases where Kairos Community College requests personal information about a student or parent/carer, if the information requested is not provided, Kairos Community 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.

Personal information such as academic and sporting achievements, student activity details and similar news, including photographs and videos, may be published in School newsletters, School annual reports, on social media channels, our school intranet, on our website or for marketing purposes (see Marketing below).

Kairos Community College will obtain permissions annually from the student's parent and/or guardian (and from the student if appropriate) to include photographs or videos or other identifying material in promotional material or otherwise make publicly available.

Job applicants and potential contractors

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

The purposes for which Kairos Community College uses personal information of job applicants and potential contractors, includes:

- administration of the individual's employment or contract
- insurance
- to satisfy the school's legal obligations e.g., in relation to child protection legislation.

Volunteers

Kairos Community College collects personal information about volunteers who assist Kairos Community College in its functions or conduct associated activities, such as alumni associations. The purposes for which [School Name] uses personal information of volunteers, includes:

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

Fundraising

Kairos Community College may collect personal information from parents, staff, alumni, contractors and members of the school when seeking donations or undertaking fundraising activities.

Personal information held by Kairos Community College may be disclosed to organisations that assist in the school's fundraising, e.g., the Kairos Elders (alumni organisation) or, on occasions, external fundraising organisations.

Marketing

Kairos Community College may use or disclose the personal information that it holds about an individual, including students, staff, parents, volunteers, alumni and other members of the school community, for the purpose of direct marketing, with the consent of the relevant parties.

Personal information in this context may include photographs and videos featured in school publications, such as newsletters, magazines, online and social media, and other marketing collateral.

To opt-out of direct marketing or change previous preferences contact please contact the Marketing Manager through katy@kairos.qld.edu.au

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

Artificial Intelligence (AI) Systems

Kairos Community College may use personal information in connection with an AI tool. The kinds of personal information that may be generated by AI systems include those set out above, under the heading 'What personal information is collected'.

Disclosure and Storage of Personal Information

Kairos Community College may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes. This may include to:

- another school or staff at another school
- 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, counsellors and providers of learning and assessment tools
- assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA).
- people providing administrative and financial services to Kairos Community College
- recipients of School publications, such as newsletters, brochures and Annual Reports
- students' parents/carers or guardians
- anyone parents/carers authorise Kairos Community College to disclose information to
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

Disclosure and Storage of Personal Information Overseas

Kairos Community College may disclose personal information to overseas recipients in the course of providing services. Under the Privacy Act, Kairos Community 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, Kairos Community College may rely on that designation to satisfy our obligations under the Privacy Act.

As of the date of this policy, no countries have been formally whitelisted. Therefore, Kairos Community College continues to assess and ensures that any overseas recipient handles personal information in accordance with the APPs.

Kairos Community College may disclose personal information about an individual to overseas recipients e.g., to facilitate a school exchange. However, Kairos Community 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)
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Kairos Community College may use online or 'cloud' service providers to store personal information and to provide services to Kairos Community College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Personal information may be disclosed, when necessary, to these service providers to enable authentication of users that access their services. This personal information may be stored in the 'cloud' which means that it may reside on a cloud service provider's server which may be situated outside Australia.

Kairos Community College uses centralised information management and storage systems (Systems) provided by third party service providers. Personal information is disclosed and stored with third party service providers for the purpose of providing services to the school in connection with the Systems.

The data centres where the personal information is likely to be kept are located in the USA, Taiwan, Singapore, Ireland, Netherlands and Belgium.

Management and Security of personal information

Kairos Community College's staff are required to respect the confidentiality of students' and parent/carers' personal information and the privacy of individuals. Kairos Community College has in place steps, including technical and organisational measures, to protect the personal information held, from misuse, interference and loss; unauthorised access; and modification or disclosure by use of various methods, including locked storage of paper records, and password access rights to computerised records.

Data Breaches

Kairos Community College will deem an 'eligible data breach' has occurred if:

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

Eligible data breach assessment/investigation

If Kairos Community College 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 Kairos Community College 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, Kairos Community College will publish a copy of the statement on its website or publicise it in another manner.

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

Access and Correction of Personal Information

Under the Privacy Act, an individual has the right to seek and obtain access to any personal information which Kairos Community College holds about them and to advise of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents/carers, but older students may seek access and correction themselves.

To make a request to access or to update any personal information Kairos Community College holds, please contact the State Principal in writing. Kairos Community College may require you to verify your identity and specify what information you require. A reasonable fee may be charged to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the likely cost will be advised in advance.

If access to that information cannot be provided, written notice explaining the reasons for refusal will be provided.

The school will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

Consent and Rights of Access to the Personal Information of Students

Kairos Community College respects every parent/carer's right to make decisions concerning their child's education. Generally, any requests for consent and notices in relation to the personal information of a student will be referred to the student's parents/carers. Kairos Community College will treat consent given by parents/carers as consent given on behalf of the student and notice to parents/carers will act as notice given to the student.

As mentioned above, parents/carers may seek access to personal information held about them or their child by contacting the State Principal by telephone or in writing. However, there will be occasions when access is denied. Such occasions may include (but are not limited to):

- where release of the information would have an unreasonable impact on the privacy of others
- where the school believes the student has capacity to consent and the school is not permitted to disclose the information to the parent/carer without the student's consent
- where the release may result in a breach of the school's duty of care to a student.

The school may, at its discretion, on the request of a student, grant that student access to information held by Kairos Community College about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents/carers. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

Enquiries and Complaints

For further information about the way Kairos Community College manages personal information, contact the Business Manager.

To make a complaint about Kairos Community College's breach of the Australian Privacy Principles refer to Kairos Community College Complaints Handling Policy.

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

Data Breaches

It will be deemed that an 'eligible data breach' has occurred if:

- there has been unauthorised access to, or unauthorised disclosure of, personal information about one or more individuals (**the affected individuals**)
- a reasonable person would conclude there is a likelihood of serious harm to any affected individuals as a result.
- the information is lost in circumstances where:
 - unauthorised access to, or unauthorised disclosure of, the information is likely to occur.
 - assuming unauthorised access to, or unauthorised disclosure of, the information was to occur, a reasonable person would conclude that it would be likely to result in serious harm to the affected individuals.

Serious harm may include serious physical, psychological, emotional, economic, and financial harm, as well as serious harm to reputation.

What must the school do in the event of an 'eligible data breach'?

If Kairos Community College suspects that an eligible data breach has occurred, it will carry out a reasonable and expedient assessment/investigation within 30 days.

If such an assessment/investigation indicates there are reasonable grounds to believe an eligible data breach has occurred, then Kairos Community College will be required to lodge a statement to the Privacy Commissioner (**Commissioner**). Where practical to do so, the school entity will also notify the affected individuals. If it is not practicable to notify the affected individuals, Kairos Community College will publish a copy of the statement on its website or publicise it in another manner.

Exception to notification obligation

An exception to the requirement to notify will exist if there is a data breach and immediate remedial action is taken, and as a result of that action:

- there is no unauthorised access to, or unauthorised disclosure of, the information.
- there is no serious harm to affected individuals, and as a result of the remedial action, a reasonable person would conclude the breach is not likely to result in serious harm.

Access and Correction of Personal Information

Under the *Privacy Act*, an individual has the right to seek and obtain access to any personal information which Kairos Community College holds about them and to advise Kairos Community College of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Students will generally be able to access and update their personal information through their parents, but older students may seek access and correction themselves.

To make a request to access or to update any personal information Kairos Community College holds about you or your child, please contact the Campus Administration Officer in writing. Kairos Community College may require you to verify your identity and specify what information you require. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

The School will take reasonable steps to ensure that any personal information is accurate, up to date, complete, relevant and not misleading.

Consent and Rights of Access to the Personal Information of Students

Kairos Community College respects every parent's right to make decisions concerning their child's education. Generally, Kairos Community College refer any requests for consent and notices in relation to the personal information of a student to the student's parents. Kairos Community 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 Kairos Community College about them or their child by contacting the State Principal or the Head of Campus, as appropriate. 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 Kairos Community College's duty of care to a student.

The School may, at its discretion, on the request of a student grant that student access to information held by Kairos Community 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.

Enquiries and Complaints

If you would like further information about the way Kairos Community College manages the personal information, it holds or wish to make a complaint about Kairos Community College 's breach of the Australian Privacy Principles please contact the State Principal, or the Head of Campus, as appropriate. Kairos Community 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.

APPENDIX 1

Standard Collection Notice

1. The School 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. The primary purpose of collecting this information is to enable the School 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.
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:
 - 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);
 - 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.
6. Personal information collected from students is regularly disclosed to their parents or guardians.
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. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
8. 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.
9. 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.
10. The School may 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 School'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. On occasions information such as academic and sporting achievements, student activities and similar news is published in School newsletters and magazines, on our closed Facebook group page 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 guardian (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

Kairos Elders (Alumni Association) Collection Notice

1. Kairos Community College Alumni may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of Kairos Community College and to keep alumni members informed about other members.
2. We must have the information referred to above to enable us to continue your membership of Kairos Community College Alumni.
3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by Kairos Community College to assist in its fundraising activities. If you do not agree to this, please advise us now.
4. Kairos Community College Alumni may publish details about you in our Newsletter, Website and Annual Report. If you do not agree to this, you must advise us now.
5. The School's Privacy Policy, assessible on the School's website, contains details of how you may seek access to and correction of your personal information which the School has collected and holds, and how you may complain about a breach of the Australian Privacy Principles.
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. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
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.

APPENDIX 3

Employment Collection Notice

1. In applying for this position, you will be providing Kairos Community College with personal information. We can be contacted at:
 - a. info@kairos.qld.edu.au
 - b. PO Box 869
Caloundra QLD 4551
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 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.
5. We are required to conduct a criminal record check collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. All employees will be required to provide details of their Blue Card or Teacher Registration status. Any employees that utilise a Blue Card Exemption category will be required to complete a Restricted Persons Declaration. This information will be kept in the employees confidential file and in accordance with relevant child protection legislation. We may also collect personal information about you in accordance with these laws.
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. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
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

APPENDIX 4

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the School, you will be providing Kairos Community College with personal information. We can be contacted at:
 - a. info@kairos.qld.edu.au
 - b. PO Box 869
Caloundra QLD 4551
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. 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 up to two years.
4. 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.
5. We will not disclose this information to a third party without your consent unless otherwise permitted to.
6. We are required to conduct a criminal record check collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection law. We may also collect other personal information about you in accordance with these laws.
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. Further information about the School's use of on online or 'cloud' service providers is contained in the School's Privacy Policy.
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 School and why.