



SUNRISE
Christian School

Early Learning Centres

ELC Privacy Policy

Staff, Volunteers & contractors

Ownership:	Adelaide Christian Schools Early Learning Centre	Category:	Operations
Authorised By:	ELC Executive Director	Authorised date:	March 2026
Status:	Approved	Review Date:	March 2028

Purpose and Scope

This Privacy Policy explains how **Sunrise Christian School Early Learning Centre** (the ELC), use, disclose, and protect personal information. It also explains individuals' rights in relation to their personal information and how to make a complaint.

This Policy applies to students, parents and carers, employees, volunteers, contractors, and members of the wider school community.

Legislative and Regulatory Framework

The ELC complies with all applicable Commonwealth and South Australian laws relating to privacy, child safety, and education.

Privacy and Information Laws

The ELC manages personal information in accordance with:

- Commonwealth Privacy Act 1988
- Australian Privacy Principles
- South Australian Public Health Act 2011 (Health Privacy Principles)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012
- Surveillance Devices Act 2016 (SA)
- Family Law Act 1975

Employee records are exempt from certain Privacy Act requirements where information is directly related to employment.

Early Childhood Education and Care Laws (South Australia)

The ELC operates under the **National Quality Framework (NQF)** and complies with:

- Education and Care Services National Law
- Education and Care Services National Regulations
- National Quality Standard (NQS)
- Approved Learning Frameworks (including the Early Years Learning Framework)

In South Australia, these requirements are administered and enforced by the **Education Standards Board**.

Child Safety and Protection Laws

The ELC complies with South Australian child protection legislation, including:

- Children and Young People (Safety) Act 2017
- Child Safety (Prohibited Persons) Act 2016 (Working With Children Checks)
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These laws support child protection, mandatory reporting, and safe environments for children.

Other Relevant Legal Obligations

The ELC also complies with legislation relating to:

- Work Health and Safety
- Record keeping
- Anti-discrimination
- Duty of care obligations

Vision and Values

Sunrise Christian School ELC is a faith-based learning community committed to providing a welcoming, family orientated and Christ centred learning environment where hearts and minds are educated in wisdom and understanding and students are inspired, engaged and empowered to reach their full God given potential.

In close partnership with God, parents, families and the wider community, the ELC acts as an extension of the Christian home and seeks to nurture generations of social influencers and disciples of faith who demonstrate strong Christian character, integrity and compassion.

The ELC is called to minister to the body of Christ, uphold Christian principles, be a light to Australia and the nations, minister the gospel of Jesus Christ and teach and train children in all aspects of life with God at the centre of everything. The ELC is committed to developing each student's God given talents so they may serve firstly God and then mankind, enriching the communities in which they live.

This Policy aligns with the core values of Sunrise Christian School including Biblically based foundations, Discipleship, Christ- centred learning, Partnership with God, Parents, Family and Community, Character Development and Excellence.

All students, workers and personnel will be made aware of the ELC vision and values, for instance staff and volunteers will have this included in their induction, and all members of the community will have access to it via the school website <https://www.sunrise.sa.edu.au>, internal platforms and on request.

Definitions

Doxxing

Using a carriage service (such as the internet) to intentionally publish or distribute personal data in a way that is menacing or harassing. This can result in up to 7 years imprisonment (eSafety Commissioner 2025).

Health Information

Health Information is a subset of sensitive information – any information or opinion about the health or disability of an individual, the individual's expressed wishes about the future provision of health services and a health service provided, currently or in the future, to an individual that is also personal information. Health information also includes personal information collected in the course of providing a health service.

Parents

This document refers to parents as the legal guardians and/or carers of a child. This could include birth or adoptive parents, step-parents, guardians, grandparents, or other family members.

Personal Information

Personal Information means information or an opinion whether true or not true, about an individual and that identifies or reasonably identifies the individual, regardless of its source and whether the information is recorded in a material form or not.

Sensitive Information

Sensitive Information is a type of information that is given extra protection and must be treated with additional care. It can include information or opinion about an individual's racial or ethnic origin, political opinions, membership of a professional association, religious beliefs or affiliations, philosophical beliefs,

membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record. It can include health information and biometric information. This information will be used only for the purpose for which it was provided or a directly related secondary purpose, unless an individual or parent agrees otherwise or unless the disclosure is allowed by law.

Records

The Privacy Act regulates personal information contained in a 'record'. A 'record' includes a 'document' or an 'electronic or other device'. A 'document' is defined to include anything on which there is writing, anything from which sounds, images or writings can be reproduced, drawings or photographs.

Information We Collect

The ELC may collect personal, sensitive, and health information about:

1. Students and Parents before, during and after the course of a student's enrolment at the ELC, 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 and names of doctors);
 - financial information;
 - results of assignments, tests and examinations;
 - 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 Family Court orders;
 - criminal records;
 - volunteering information; and
 - photos and videos at ELC events;
2. Job applicants, staff members, 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 ELC events;
 - workplace surveillance information; and
 - work emails and private emails (when using work email address) and Internet browsing history; and
3. Other people who come into contact with the ELC, including name and contact details and any other information necessary for the particular contact with the ELC.

How Information Is Collected

Personal information you provide: The ELC generally collects personal information about an individual directly from the individual (or their Parent in the case of students). This includes by way of forms, face-to-face meetings and interviews, emails and telephone calls. On occasion, people other than Parents and students provide personal information.

Personal information provided by other people: In some circumstances the ELC may be provided with personal information about an individual from a third party, for example a report provided by a medical professional, a reference from another school or a referee for a job applicant. If a student transfers to a new school, the new school may collect personal information about the student from the student's previous school to facilitate the transfer of the student.

Personal information generated by artificial intelligence (AI) systems: We might also collect personal information by using AI systems to generate it. The kinds of personal information that may be generated by AI systems include those set out above under the heading 'Kinds of personal information we collect'.

Personal information from other sources: We may also collect personal information through surveillance activities (such as CCTV security cameras) and student email monitoring.

Exception in relation to employee records: Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the ELC's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the ELC and employee.

Information Usage

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

Students and Parents:

- providing schooling and school activities;
- satisfying the needs of Parents, the needs of students and the needs of the ELC throughout the whole period a student is enrolled at the ELC;
- making required reports to government authorities;
- keeping Parents informed about matters related to their child's schooling,
- through correspondence, apps, newsletters and magazines;
- day-to-day administration of the ELC;
- looking after students' educational, social and health wellbeing;
- seeking donations for the ELC (see the 'Fundraising' section of this Privacy Policy); and
- to satisfy the ELC's legal obligations and allow the ELC to discharge its duty of care.

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

Volunteers:

- to contact you about, and administer, the volunteer position;
- for insurance purposes; and
- satisfying the ELC's legal obligations, for example, in relation to child protection legislation.

Job applicants and contractors:

- assessing and (if successful) engaging the applicant or contractor;
- administering the individual's employment or contract;
- seeking donations for the ELC (see the 'Fundraising' section of this Privacy Policy);
- for insurance purposes; and
- satisfying the ELC's legal obligations, for example, in relation to child protection legislation.

Marketing and Fundraising:

Personal information held by the ELC may be used to make an appeal to them and disclosed to organisations that assist in the ELC's fundraising, for example, the parent Group. ELC publications, such as newsletters, magazines and yearbooks, which include personal information, may also be used for marketing purposes.

Disclosure of Personal Information

Information may be disclosed where necessary for education, care, administration, or legal compliance, including to:

- regulatory and funding authorities
- medical professionals
- service providers and advisors
- insurers
- other schools and teachers at those schools, including a new school to which a student transfers to facilitate the transfer of the student;
- government departments
- educational assessment bodies including the **Australian Curriculum, Assessment and Reporting Authority (ACARA)** the **Association of Independent Schools of South Australia (AISSA)**
- the provider of our information management and storage system and other information technology services;
- authorised individuals
- authorities where disclosure is required by law
- providers of specialist advisory services and assistance to the ELC, including in the area of Human Resources, child protection, students with additional needs and for the purpose of administering our learning management ensuring their proper use (see further the section below 'Sending and storing information overseas');
- providers of learning and assessment tools;
- people providing administrative and financial services to the ELC;
- students parents;
- third party providers of the AI systems we use

Disclaimer of Sharing Information between entities

The ELC may share personal information with related entities, governing bodies, approved providers, or affiliated education and care services where this is necessary for lawful, administrative, educational, or child safety purposes.

This may include circumstances such as:

- service management or governance oversight
- enrolment administration across services
- transition of a child between related services
- compliance, licensing, or regulatory reporting
- provision of shared support services (e.g. IT, finance, inclusion support)
- health, wellbeing, or child protection matters
- quality assurance, auditing, or risk management

Personal information will only be shared where:

- it is reasonably necessary for the provision of education and care or service operations
- the receiving entity is required to protect the information in accordance with privacy laws
- consent has been provided where required, or disclosure is authorised or required by law
- the sharing is consistent with the purpose for which the information was collected

All related entities are required to manage personal information in accordance with applicable privacy legislation and confidentiality obligations.

Where practicable, families will be informed when personal information is shared between related entities, unless disclosure is required or authorised by law.

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 confidentially stored with and accessible by the third-party service providers for the purpose of providing services to the ELC in connection with the systems.

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

Sending and Storing information overseas

The ELC may disclose personal information about an individual to overseas recipients in certain circumstances, for instance, to facilitate a school exchange. As far as is practicable, the ELC endeavours to utilise onshore service providers.

The ELC may use online or 'cloud' service providers to store personal information and to provide services to the ELC 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 Microsoft. Microsoft stores and processes limited personal information for this purpose. ELC personnel and its authorised 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 software systems and ensuring their proper use.

Security of personal information

The ELC is committed to ensuring personal information is handled with vigilance, preventing any use that could constitute a 'serious invasion of privacy' (Privacy Act 1988, Schedule 2—Statutory Tort for Serious Invasions of Privacy). The ELC acknowledges doxxing as a serious offence and the intentional exposure of personal information is considered a criminal act.

The ELC has in place steps to protect the personal information the ELC holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records.

These steps include:

- Restricting access to information on the ELC 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 ELC buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Implementing 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. This may be done in conjunction with Safer Technologies 4 Schools (ST4S) who evaluate digital products and services against a nationally consistent security and privacy control framework (ST4S, 2025)

Access and Correction of Personal Information

Under the Commonwealth Privacy Act an individual has the right to seek access to, and/or correction of, any personal information which the ELC holds about them.

There are some exceptions to these rights set out in the applicable legislation. To make a request to access, update or correct any personal information the ELC holds about a parent or child, the ELC can be contacted. The ELC may require you to verify your identity and specify what information you require. The ELC may charge a reasonable fee for giving access to your personal information (but will not charge for the making of the request or to correct your personal information). If the information sought is extensive, the ELC will advise the likely cost in advance.

To ensure Duty of Care is upheld, information may not be shared in cases where there are legal requirements, including court orders, in place.

If the ELC refuses a request, it will provide you with written notice explaining the reasons for refusal (unless, in light of the grounds for refusing, it would be unreasonable to provide reasons) and how to complain.

Responsibilities

The Approved Provider and/or Nominated Supervisor will:

- Ensure that obligations under the Education and Care Services National Law and Education and Care Services National Regulations are met
- Ensure all records and documents are maintained and stored in accordance with Regulations 181 and 183 of the Education and Care Services National Regulations 2011
- ensuring the service complies with the requirements of the Privacy Principles as outlined in the Health Records Act 2001, the Information Privacy Act 2000 and, where applicable, the Privacy Act 1988 by developing, reviewing and implementing processes and practices that identify:
 - The name and contact details of the Service
 - What information the service collects about individuals, and the source of the information
 - Why and how the service collects, uses and discloses the information
 - Who will have access to the information
 - Collection, storage, use, disclosure, and disposal of personal information collected by the Service
 - Any law that requires the particular information to be collected
 - Adequate and appropriate storage for personal information collected by the Service
 - Protection of personal information from unauthorised access
- ensuring parents/guardians know why the information is being collected and how it will be managed
- ensuring the appropriate use of images of children, including being aware of cultural sensitivities and the need for some images to be treated with special care
- developing procedures to monitor compliance with the requirements of this policy
- ensuring all employees and volunteers are provided with a copy of this policy, including the Privacy Statement of the service and are implemented
- ensuring all parents/guardians are provided with the service's Privacy Statement and all relevant forms
- informing parents/guardians that a copy of the complete policy is available on request
- providing notice to children and parents/guardians when photos/video recordings are going to be taken at the service
- establishing procedures to be implemented if parents/guardians request that their child's image is not be taken, published or recorded, or when a child requests that their photo not be taken
- obtaining informed and voluntary consent of the parents/guardians of children who will be photographed or videoed
- reading and acknowledging they have read the Privacy and Confidentiality Policy
- Ensure all relevant staff understand the requirements under Australian's privacy law and Notifiable Data Breaches (NDB) scheme.
- Ensure personal electronic devices including phones, smartwatches or other devices that are able to take, store or transmit images or videos, are not in the possession of any person while providing education and care and working directly with children.

Educators are responsible for:

- Reading and acknowledging they have read the Privacy and Confidentiality Policy
- Comply with legislative requirements regarding the use of personal electronic devices use to take, store or transmit images or videos of children whilst at the education and care Service.
- Recording information on children, which must be kept secure and may be requested and viewed by the child's parents/guardians and representatives of the Registration Board during an inspection visit
- Ensuring they are aware of their responsibilities in relation to the collection, storage, use, disclosure and disposal of personal and health information
- Implementing the requirements for the handling of personal and health information, as set out in this policy
- Respecting parents' choices about their child being photographed or videoed.

Parents/guardians are responsible for:

- Being aware and adhering to the Privacy and Confidentiality Policy upon enrolment
- Being aware and adhering to the Family Conduct Guidelines upon enrolment
- Providing accurate information when requested
- Maintaining the privacy of any personal or health information provided to them about other individuals, such as contact details
- Completing all permission forms and returning them to the service in a timely manner
- Being sensitive and respectful to other parent/guardians who do not want their child to be photographed or videoed
- Being sensitive and respectful of the privacy of other children and families in photographs/videos when using and disposing of these photographs/videos.
- Volunteers and students, while at the service, are responsible for following this policy and its procedures.

Appendix – Employment Collection Notice (for job applicants and staff)

1. In order to assess your application for employment, Sunrise Christian School Early Learning Centres (the ELC) collects your personal information. If we cannot collect some of your personal information, we may be limited in our ability to assess your application.

2. The ELC collects personal information about you before and during the course of your employment at the ELC. This may be in writing, through technology systems (including CCTV) or in the course of conversations. CCTV surveillance camera footage may be recorded on ELC grounds for the purpose of security, Work, Health and Safety, and in the management of critical or serious incidents. We might also use artificial intelligence (AI) systems to collate or analyse your personal information. The types of personal information the ELC collects includes sensitive information, which includes health information.

3. We collect your personal information directly from you (including from your job application) as well as from other sources (such as your referees and the results of Working With Children Checks and criminal background checks) to assess your application for employment. We might also use artificial intelligence (AI) systems to collate and analyse your personal information. We may keep your information on file if your application is unsuccessful in case another position becomes available.

4. We are required to conduct, or obtain a copy of, a Working with Children Check to collect information

regarding whether you are or have been the subject of an AVO (Apprehended Violence Order) or an Intervention Order and certain criminal offences under Child Protection laws. We may also collect personal information about you in accordance with these laws.

5. The ELC uses centralised information management and storage systems (Systems) managed by third party providers. Personal information is stored with and may be disclosed to these third party service providers for the purpose of providing services to the ELC in connection with the Systems.

6. The ELC may use online or 'cloud' service providers to store personal information and to provide services to the ELC that involve the use of personal information, such as email services. Some limited personal information may be provided to these service providers to enable them to authenticate users that access their services and provide technical support. This personal information may reside on a cloud service provider's servers which may be situated outside Australia. Further information about the ELC's use of an online or 'cloud' service providers is contained in the ELC's Privacy Policy.

7. The ELC's Privacy Policy, accessible on the ELC's website, contains details of how you may seek access to and correction of your personal information which the ELC holds, as well as how you can make a privacy complaint and how we will handle the complaint.

8. If you provide us with the personal information of others (e.g. referees), we encourage you to inform them that you are disclosing that information to the ELC and why.

Enquiries and Complaints

If a parent would like further information about the way the ELC manages the personal information it holds or wish to complain that the ELC has breached the Australian Privacy Principles the ELC office can be contacted. The ELC will investigate any complaint and will notify the parent of the making of a decision in relation to the complaint as soon as is practicable after it has been made.

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

Additional Resources

References

AISSA (2025), Privacy Compliance Manual, accessed 27 November, 2025.

eSafety Commissioner (2025), Doxing, <https://www.esafety.gov.au/industry/tech-trends-and-challenges/doxing> accessed 6 November, 2025.

ST4S (2025), Safer Technologies 4 Schools, <https://st4s.edu.au/> accessed 6 November, 2025

Induction and Ongoing Training

All new employees will complete an induction training program upon commencement of employment to ensure they understand the ELCs values, policies, procedures, and their specific roles and responsibilities.

Ongoing training will be provided regularly to maintain and enhance employees' skills, knowledge, and compliance with current legislation and best practices. Training frequency will be determined by role


requirements, regulatory standards, and identified professional development needs, with refresher training conducted at least annually or as required when policies, procedures, or regulations change.

Monitoring, Evaluation and Review

All ELC policies and procedures will be reviewed every two years to ensure they remain current, relevant, and effective. However, if there are significant legislative, regulatory, operational, or organizational changes, the affected policies and procedures will be reviewed and updated immediately to reflect those changes.

Effectiveness of this policy will be evaluated through staff feedback, family input, and incident data during annual QIP reviews.

ELC Privacy Policy

Number of pages	10	Version History	2026	
Date authorised	25 February 2026			
Authorised by Approved Provider	Adelaide Christian Schools Early Learning Centres			
Monitored by	ELC Executive Director	ELC Executive Director Authorisation		

Review Date	Reason for Review	Details of Changes
Feb 2026	Regular	New policy created

EDUCATING HEARTS AND MINDS

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