



## **Privacy**

## Section 1 – Background

Edmund Rice Education Australia Flexible Schools Ltd ('EREAFSL') is a Company Limited by Guarantee and is a registered not-for-profit with the Australian Charities and Not-for-Profit Commission ('ACNC').

EREAFSL administers a network of Catholic Schools across Australia (see <u>Schedule 1</u>) in the Edmund Rice Tradition. The charism of Blessed Edmund Rice expressed through the touchstones of Liberating Education, Gospel Spirituality, Inclusive Community and Justice and Solidarity, underpins our continued commitment to a safe and inclusive environment for all.

## Section 2 - Purpose

This policy sets out how EREAFSL and its Schools listed in <u>Schedule 1</u> collects, uses and manages personal information. EREAFSL privacy obligations are governed by the *Privacy Act 1988* (Cth), the Australian Privacy Principles ('APP's'), and other relevant state and territory privacy legislation.

## Section 3 – Scope

This policy applies to all Young People, parents, carers, families, Staff, Volunteers, Contractors, Board Directors, Board Committee members, and School Advisory Council ('SAC') members at EREAFSL and in each of its Schools listed in Schedule 1 of this policy. This policy also applies to job applicants.

This policy should be read in conjunction with the *Privacy Guidelines and Procedures*.

## Section 4 – Definitions and Interpretations

Where the following term(s) and acronym(s) are used within this policy they are intended to have the meaning(s) as outlined below:

#### 4.1 DEFINITIONS

Term	Definition
Board	means the EREAFSL Board.
<b>Board Committee</b>	means a Committee of the Board, which may include persons other than Board Directors.
<b>Board Directors</b>	means Directors of the Board.
Contractor	means someone engaged by EREAFSL to perform specific tasks. Contractors are not employees of the EREAFSL.
Effective date	means the date of publication of the policy.
Head of Campus / Principal	means the appointed authority of an EREAFSL School.



Health information  Notifiable privacy	<ul> <li>includes any information or opinion collected about:</li> <li>the heath, including illness, disability, or injury (at any time) of an individual;</li> <li>an individual's expressed wishes about the future provision of health services to them; and/or</li> <li>a health service provided, or to be provided, to an individual.</li> <li>means unauthorised access to, unauthorised disclosure of, or loss of, personal</li> </ul>	
breach	information held by EREAFSL where a reasonable person would conclude that the access, disclosure, or loss would be likely to result in serious harm to any of the individuals to whom the information relates.	
Personal information	The <i>Privacy Act 1988</i> defines personal information as information or an opinion, whether true or not and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identified. For example, an individual's name, signature, address, phone number, or date of birth, credit information, photographs, IP address(es), voice print and facial recognition biometrics.	
Procedures	refers to the <i>Privacy Guidelines and Procedures</i> .	
Reasonably identified / identifiable	in relation to personal information, means information can qualify as personal information even if it does not include any obvious identifying features, e.g., a person's name or photograph, if someone could deduce or figure out the identity of the person by looking at the information.	
School(s)	means the registered non-government schools (including Registered Training Organisations ('RTO') and other educational facilities) located in and operating within Australia that are listed in <u>Schedule 1</u> , and such other schools, RTO or educational facilities as EREAFSL may establish in Australia or acquire, govern, and operate from timeto-time. This definition also applies to campuses of Schools and to a School operating across various sites.	
Sensitive information	means information or opinion about an individual's – racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; or criminal record that is also Personal Information.	
Serious harm	in relation to a privacy breach, includes serious physical, psychological, emotional, financial, or reputational harm.	
Staff	means current EREAFSL employees, including contractors and volunteers.	
Teacher	means a person employed in a School who is qualified in that jurisdiction to practice as a teacher of children and Young People of school age.	
Volunteer	means a person associated with a School who (by agreement with the School) does unpaid work for that School for the main benefit of the Young People and/or School Community without expectation of personal financial gain.	
Young Person / Young People	also known as students, means those who are currently enrolled at one of the EREAFSL Schools listed in <u>Schedule 1</u> .	

#### 4.2 ACRONYMS

Acronym	Full Reference
ACNC	means the Australian Charities and Not-for-Profit Commission.
APP	means the Australian Privacy Principles.
CEO	means the EREAFSL Chief Executive Officer.
EREAFSL	means Edmund Rice Education Australia Flexible Schools Ltd.
NCVER	means National Centre for Vocational Education Research.
OAIC	means the Office of the Australian Information Commissioner.
RTO	means Registered Training Organisation/s.
SAC	means School Advisory Council/s.
USI	means Unique Student Identifier.
VET	means Vocational Education and Training.



## Section 5 – What kind of personal information does EREAFSL collect?

#### 5.1 YOUNG PEOPLE, PARENTS, AND CARERS

EREAFSL collects personal information, including health and other sensitive information about Young People and their parents or carers before, during, and after the period of a Young Person's enrolment at an EREAFSL School, which may include:

- name, date of birth, gender, language background, previous school, religion, contact details (including next of kin), mobile phone number and email address of parents / carers;
- parent / carer's education, occupation, and language backgrounds;
- medical information (e.g., details of a disability and/or allergies, medical reports, and names of health professionals);
- behavioural and conduct reports from previous schools;
- academic school reports;
- information about referrals to government welfare agencies;
- counselling reports;
- health fund details and Medicare numbers;
- any relevant court orders, such as parenting orders, apprehended domestic violence orders;
- volunteering information; and/or
- · photos and videos at school events.

At the request of a Young Person, there may be instances where an EREAFSL School collects and holds the birth certificate of a Young Person onsite. This is typically due to the Young Person not being able to safely store this document at their residence. Birth certificates collected and held in this manner are securely stored within the Schools' main administration area. Birth certificates are returned to the Young Person at the end of their enrolment with EREAFSL, or at another time whenever requested.

If a Young Person is enrolled at both an EREAFSL School and EREA Flexi RTO in a Vocational Education and Training ('VET') course, EREAFSL is required to hold a verified Unique Student Identifier ('USI') number for them.

#### 5.2 JOB APPLICANTS AND EMPLOYMENT RECORDS

EREAFSL collects and holds personal information, including health and other sensitive information, about job applicants, Staff, Volunteers, Contractors, Board Directors, and Board Committee members which may include:

- name, date of birth, gender, religion, contact details (including next of kin);
- driver's license details;
- · Working With Children Check (WWCC) details;
- medical information (e.g., details of disability and/or allergies, medical reports, and medical certificates);
- leave details;
- photos and videos at school events;
- technical or metadata fields and logs (e.g., IP addresses, device identifiers for every device on the EREAFSL ICT network) that can reasonably identify an individual;
- workplace surveillance information collected in accordance with the EREAFSL Workplace Surveillance Policy.

Under the *Privacy Act 1988* the APP's do not apply to an employee record of current and former employees. As a result, this policy does not apply to EREAFSL's treatment of an employee's record, where the treatment is directly related to a current or former employment relationship between EREAFSL and the employee.

#### 5.3 OTHERS WHO COME INTO CONTACT WITH EREAFSL

EREAFSL collects and holds personal information, including health and other sensitive information about other people who come into contact with EREAFSL or its Schools, including name and contact details and any other information necessary for the particular contact with EREAFSL.

EREAFSL may collect personal information about an individual from publicly available sources such as the Internet, as well as social and professional media platforms.



EREAFSL may also collect personal information about an individual from third parties such as:

- EREAFSL related entities and service providers; and
- Teachers, guardians, carers, parents, and colleagues of the individual.

### Section 6 – How information is collected

Personal information will be collected in a way that is lawful, fair, and not unreasonably intrusive to the privacy of the individual concerned. Where it is reasonable and practicable to do so EREAFSL will collect personal information directly from the individual concerned, rather than from a third party.

When collecting information from the individual, EREAFSL will take reasonable steps to inform the individual:

- why the information is being collected, and how it is intended to be used,
- · EREAFSL's authority to collect the information, and
- any third parties to whom EREAFSL routinely disseminates the information to.

EREAFSL will, wherever possible, standardise the collection of personal information about an individual by way of forms filled out in person, online via email or a website. However, given the nature of our operations we also receive Personal Information by email, letters, notes, via our website, over the telephone, in face-to-face meetings, and through surveillance activities such as the use of CCTV security cameras and email monitoring.

On applying to enrol a Young Person at an EREAFSL School, parents and carers provide permission for EREAFSL to obtain personal information about the Young Person from a third party, for example, via medical reports, school reports. However, we will only do so where it is not reasonable or practicable to collect the personal information from the individual directly.

We collect information based on how individuals use our website. This includes the use of cookies and other data collection methods to gather information on website activity, such as the number of visitors, the number of pages viewed, and the internet advertisements that bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns, and to record statistics on web traffic. We do not use this information to personally identify individuals. Visitors have the right to restrict the processing of their data.8.2 Unsolicited Information

EREAFSL may be provided with personal information without having sought it through our normal means of collection.

If EREAFSL receives unsolicited personal information, it will consider if collecting that information would have been reasonably necessary in the provision of its services. Unsolicited information obtained by EREAFSL will only be held, used, and/or disclosed if it is considered as personal information that could have been collected by normal means. If that unsolicited information could not have been collected by normal means, then we will destroy, permanently delete, or deidentify the personal information as appropriate.

## Section 7 – Use and Disclosure of personal information

EREAFSL will only use and disclose personal information for the primary purpose for which it was collected or as otherwise specified in this policy. Only personal information that is required for lawful activities or functions will be collected.

Personal information will only be used for a secondary purpose if consent has been obtained, the use or disclosure is reasonably expected, or it falls within a permitted exception.

EREAFSL primary purposes for using and disclosing personal information include, but are not limited to:

- enabling EREAFSL Schools to provide education for the Young Person;
- direct communication with parents, carers and Young People;
- complying with our legal obligations, including duty of care and child protection requirements;
- conducting marketing, promotional, and fundraising initiatives;
- performing necessary associated administrative activities which will enable the Young People to take part in all the activities of the school;
- the employment of staff;
- the engagement of volunteers and/or contractors.



It is important to note that in some cases, where EREAFSL or one of its Schools requests personal information about a Young Person and/or their parent or carer and the information requested is not provided, EREAFSL may not be able to enroll or continue the enrolment of the Young Person or permit the Young Person to take part in a particular activity.

#### 7.1 SHARING BETWEEN EREAFSL SCHOOLS AND ENTITIES

Parents and carers are made aware on enrolment that personal information may be shared between related body corporates which include EREAFSL Schools. Where information is shared between Schools it may only be used for the purpose for which it was originally collected by EREAFSL.

EREAFSL will seek consent from Young People and/or Parents and carers for the sharing of sensitive information or personal information that is not intended to be used or disclosed for the primary purpose for which it was collected.

#### 7.2 SHARING BETWEEN EREAFSL AND NON-EREAFSL SCHOOLS

Personal information may be shared with non-EREAFSL schools where it is necessary to support the educational, wellbeing or safety needs of the Young Person. Any information shared must be limited to what is reasonably required for the intended purpose and must be handled in accordance with applicable privacy laws and EREAFSL's privacy obligations.

EREAFSL will seek consent from Young People and/or Parents and carers before sharing sensitive information or personal information with non-EREAFSL Schools, unless the disclosure is otherwise permitted or required by law.

#### 7.2 DISCLOSURE OVERSEAS

EREAFSL may disclose personal information about an individual to overseas recipients. We will take reasonable steps to ensure that the overseas recipient does not breach the APP's in relation to the information.

EREAFSL will not send sensitive information about an individual or information for a secondary purpose outside Australia without:

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

EREAFSL may use Software as a Service (SaaS) or cloud IT services to store personal information and to provide services to EREAFSL 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 be stored in cloud services which means that it may reside on a cloud service provider's software and/or hardware platform which may be situated outside Australia. EREAFSL takes steps to ensure that any transfer of personal information outside Australia complies with applicable data protection laws and regulations.

## Section 8 – Storage and security of personal information

EREAFSL stores personal information in a variety of formats including, but not limited to:

- databases;
- hard copy / paper-based files;
- · devices, including laptop computers and tablets; and
- third-party storage providers, such as cloud storage facilities.

EREAFSL and each of its Schools has steps in place to protect the personal information it holds from misuse, interference, loss, unauthorised access, modification, or disclosure. These steps include, but are not limited to:

- restricting access and user privilege of information by Staff depending on their role and responsibilities;
- ensuring that the identity of Staff is identified securely through authentication when accessing IT systems that contain personal information;
- Staff maintaining the integrity and confidentiality of passwords and devices they use to access IT systems that contain personal information;
- ensuring Staff respect the confidentiality of the personal information of others, in particular Young People and their parents, carers, or guardians;



- ensuring hard copies and paper files are stored in secure storage facilities that employ authorisation and
  access management in the case of offsite storage or, in the case of onsite storage, lockable filing cabinets in
  lockable rooms, with role-based access restrictions;
- ensuring EREAFSL premises are secured;
- implementing physical security measures at EREAFSL facilities to prevent break-ins;
- ensuring our IT and cybersecurity systems, policies and procedures are implemented, up-to-date, and subject to regular assessment and testing;
- undertaking due diligence with respect to third party service providers who may have access to personal information; and
- the destruction, deletion, deidentification of personal information we hold that is no longer needed or required to be obtained by other legislation in accordance with the *Records Management Policy* and related *Retention, Archival, and Disposal Schedule*.

## Section 9 - Requesting access to personal information held

Under the *Privacy Act 1988*, an individual has the right to obtain access to any personal information that EREAFSL or its Schools holds about them and to advise EREAFSL of any perceived inaccuracies and request that corrections / amendments be made.

All requests to access any information EREAFSL or its Schools holds must be made in writing using the Personal Information Request form.

EREAFSL will respond to a request within a reasonable period, usually within 30 days after receipt of the request, and noting that it occasionally may take longer if the request is complex or there are several requests.

Please refer to the *Privacy Guidelines and Procedures* for more information.

#### 9.1 REQUESTING DETAILS OF PERSONAL INFORMATION ABOUT YOUNG PEOPLE UNDER 18

EREAFSL respects parents and carers right to make decisions concerning their child's education and wellbeing. Generally, EREAFSL will refer any requests for consent and notices in relation to the personal information of a Young Person under the age of 18 to their legal guardian, except in situations where the Young Person is living independently. EREAFSL will treat consent given by a parent or carer as consent given on behalf of the Young Person and notice to parents and carers will act as notice given to the Young Person.

There may be circumstances where access is denied. If EREAFSL declines a request to access personal information, where appropriate, we will explain the reasons for our decision.

EREAFSL may, at its discretion and on the request of a Young Person, grant that Young Person access to information EREAFSL holds about them or allow a Young Person to give or withhold consent to the use or disclosure of their personal information, independently of their parents / carers. This would generally only be done when the maturity of the Young Person and/or the Young Person's personal circumstances warrant it. Generally, EREAFSL may assume a Young Person over the age of 15 has the capacity to consent but this will be assessed on a case by case basis.

#### 9.2 UPDATING PERSONAL INFORMATION

EREAFSL takes all reasonable steps to ensure that the personal information EREAFSL collects is accurate, up to date, and complete. If we identify personal information that is incorrect or outdated, we will take reasonable steps to correct or update it.

Members of the EREAFSL community are asked to keep EREAFSL informed of any changes to personal information and can contact EREAFSL to update and correct personal information held by EREAFSL about them.



## Section 10 - Complaints

An individual can make a complaint about how EREAFSL manages personal information, including a breach of the *Privacy Act 1988* or any state-based legislation.

If an individual believes that their privacy has been breached, a complaint should be made in writing to the Privacy Officer via email <a href="mailto:privacy@flexi.edu.au">privacy@flexi.edu.au</a> or by completing the Privacy Complaint form. Alternatively, an individual can access and utilise the complaints handling processes by referring to the *Complaint Handling Policy* and related *Guidelines and Procedures*.

If the complainant feels that the complainant is not resolved to their satisfaction, and more than 30 days have passed since the complaint was made to EREAFSL, the individual may lodge a complaint with the OAIC. For more information refer to the OAIC website.

## Section 11 – Compliance and Accountability

#### 11.2 BREACH OF THIS POLICY

A privacy breach can cause serious financial, physical, reputational, social, and/or psychological harm to those involved. Individuals who breach this policy may be subject to disciplinary action, including and up to termination of their employment.

Individuals who become aware of an actual or suspected breach of this policy are obliged to report it. All EREAFSL Staff are responsible for reporting any breaches of this Policy to the Privacy Officer or CEO as soon as practicable after the breach has been identified by sending an email to privacy@ereafsn.edu.au. Following notification, management will:

- for minor breaches of the Policy liaise with the relevant department on the necessary actions required to prevent a similar breach from occurring; and
- for major breaches of the Policy commence an investigation into the breach.

The CEO must be informed of breaches of this policy and any actions arising out of any investigations. A breach of this policy may, depending on the circumstances, constitute a breach of the *Staff Code of Conduct*.

#### 11.2.1 Notifiable data breaches

In adherence with the *Privacy Act 1988*, under the Notifiable Data Breach scheme, it is mandatory for EREAFSL to report all eligible data breaches to the Office of the Australian Information Commissioner ('OAIC').

An eligible data breach will occur if:

- there is unauthorised access to, unauthorised disclosure of, or loss of, personal information held by EREAFSL;
- a reasonable person would conclude that the access, disclosure, or loss would be likely to result in serious harm to any of the individuals to whom the information relates.

In the event of a data breach, EREAFSL will contain the data breach to prevent any further compromise of personal information; assess the data breach by gathering the facts and evaluating the risks, including potential harm to affected individuals and, where possible, acting to remediate any risk of harm. A review of the incident will be undertaken, and actions taken to prevent future breaches.

#### 11.3 RECORD KEEPING

All records pertaining to this policy will be managed and maintained in accordance with the *Records Management Policy* and related *Retention, Archival, and Disposal Schedule*.

When managing the privacy of information, EREAFSL and its Schools will keep and maintain any records as required in compliance with statutory authority requirements.

The National Risk and Compliance team will keep records, in accordance with the *Records Management Policy*, of all policy review processes related to this policy, including records and notes from policy audits, feedback and consultation processes, and any subsequent changes.



## Section 12 – Associated Information

This policy aligns with, and is supported and complimented by, the following Commonwealth and State/Territory legislation, standards, regulations, EREAFSL policies and procedures, and other supporting forms and documentation:

Related Legislation, Policies and Procedures	
Relevant Legislation, Legislative Instruments, Standards and Regulations	<ul> <li>Commonwealth         <ul> <li>Australian Education Act 2012 and Regulations 2013</li> </ul> </li> <li>National Vocational Education and Training Regulator Act 2011</li> <li>Privacy Act 1988, Regulations 2013, and the Australian Privacy Principles</li> <li>Privacy Amendment (Notifiable Data Breaches) Act 2017</li> <li>Privacy Amendment (Enhancing Privacy Protection) Act 2012</li> <li>Student Identifiers Act 2014</li> </ul>
	Queensland
	New South Wales  • Education Act 1990  • Education Standards Authority Act 2013  • Privacy and Personal Information Protection Act 1998 and Regulation 2019  • Information Protection Principles  • Privacy Code of Practice 2003  • Health Records and Information Privacy Act 2002 and Regulation 2022  • Health Privacy Principles
	Tasmania  Education Act 2016 and Regulations 2017  Personal Information Protection Act 2004  Personal Information Protection Principles  South Australia
	South Australia     Education and Children's Services Act 2019 and Regulations 2020
	Western Australia     Registration Standards for Non-Government Schools     School Education Act 1999 and Regulations 2000
Relevant EREAFSL Policies and Procedures	<ul> <li>Code of Conduct – Staff</li> <li>Code of Conduct – Young People</li> <li>Complaint Handling Policy</li> <li>Complaint Handling Guidelines and Procedures</li> <li>Privacy Guidelines and Procedures</li> <li>Risk Management Policy</li> <li>Records Management Policy</li> <li>Records Management Guidelines and Procedures</li> <li>Use of Image Policy</li> <li>Whistleblower Policy</li> <li>Workplace Complaint Management Guidelines and Procedures</li> <li>Workplace Complaint Management Guidelines and Procedures</li> </ul>
Other Relevant Reference	Personal Information Request form (online)
Documents, Websites and Forms	<ul><li>Personal Information Request form (printable)</li><li>Privacy Complaint form (online)</li></ul>



<ul> <li>Retention, Archival, and Disposal Schedule – QLD</li> </ul>
<ul> <li>Retention, Archival, and Disposal Schedule – NSW</li> </ul>
<ul> <li>Retention, Archival, and Disposal Schedule – NT</li> </ul>
<ul> <li>Retention, Archival, and Disposal Schedule – SA</li> </ul>
<ul> <li>Retention, Archival, and Disposal Schedule – TAS</li> </ul>
Retention, Archival, and Disposal Schedule – WA

## Section 13 – Review

This policy will be reviewed at **biennially**, and amendments and updates made as required. Reviews may occur more regularly where a legislative or regulatory change requires it. Any related procedures, guidelines, or forms are also reviewed at least **biennially**, or more regularly as required by change to legislation.

The National Risk and Compliance team is responsible for ensuring that the **biennial** review of this policy is undertaken, which includes applying any relevant legislative and/or regulatory changes, thorough consultation with relevant stakeholders, and having the policy reviewed and approved by the EREAFSL CEO and Board.

## Section 14 – How to Contact us

EREAFSL can be contacted about this Privacy Policy or the handling of personal information by:

Email	privacy@flexi.edu.au	
Phone	07 3741 1111	
Write to	The Privacy Officer at PO Box 117 Pinkenba, QLD 4008	



## Section 15 – Document Version Control

Privacy Policy	
Status	DRAFT
Version	Version 1.0
Policy Code	RC.010
Category	Operational
Sub-Category	Risk and Compliance
Effective Date	12 May 2025
Review Date	12 May 2027
Approval Authority	Chief Executive Officer ('CEO')
<b>Governing Authority</b>	EREAFSL Board
Approval Date	12 May 2025
Expiry Date	12 MAY 2027
Policy Owner	Chief Operations Officer
Policy Owner Delegate	National Risk and Compliance



# Schedule 1 – Schools\* under the administration of Edmund Rice Education Australia Flexible Schools Ltd.

School	Site Address
Albert Park Flexible School	1 Hale Street, Brisbane QLD 4000
Bowen Education Engagement Program	48 George Street, Bowen QLD 4805
Burdekin Education Program	Ayr Racecourse – Cunningham Street, Ayr QLD 4807
Deception Bay Flexible School	17 Silver Street, Deception Bay QLD 4508
Edmund Rice Flexi School (Davoren Park)	8 Skewes Street, Davoren Park SA 5113
Edmund Rice Flexi School (Elizabeth)	Bldg G21 Elizabeth TAFE – Woodford Road, Elizabeth SA 5112
FAME	13 McKinna Road, Christie Downs SA 5164
Flexi RTO	Unit 18, 56 Lavarack Avenue, Eagle Farm QLD 4009
Geraldton Flexible School	15 Bayly Street, Geraldton WA 6530
Gympie Flexible School	2 Bowen Lane, Gympie QLD 4570
Hemmant Flexible School	56 Hemmant-Tingalpa Road, Hemmant QLD 4174
Inala Flexible School	67 Poinsettia Street, Inala QLD 4077
Ipswich Flexible School	1 Queen Victoria Parade, Ipswich QLD 4305
Mount Isa Flexible School	74 Abel Smith Parade, Sunset Mount Isa QLD 4825
Noosa Flexible School	2 Girraween Court, Sunshine Beach QLD 4567
Pambula Beach Flexible School	149 Pambula Beach Road, Pambula NSW 2549
Rockhampton Flexible School	210 Upper Dawson Road, Rockhampton QLD 4700
St Edmund's College	60 Burns Road, Wahroonga NSW 2076
St Francis Flexible School	22 Ashbourne Grove, West Moonah TAS 7009
St Gabriel's School	190 Old Northern Road, Castle Hill NSW 2154
St Joseph's Catholic Flexible School	5 Bloomfield Street, Alice Springs NT 0870
St Laurence Flexible Learning Centre	137 Broadmeadow Road, Broadmeadow NSW 2292
St Mary's Flexible School	63 Forrester Road, St Marys NSW 2760
Southport Flexible School	2 Nakina Street, Southport QLD 4215
The Centre Education Programme	108 Mudgee Street, Kingston QLD 4114
Townsville Flexible School	22 Ingham Road, West End QLD 4810
Wollongong Flexible School	Corner Princes Highway and Towradgi Road, Towradgi NSW 2518

<sup>\* &#</sup>x27;Schools' means the registered non-government schools (including Registered Training Organisations ('RTO') and other educational facilities) located in and operating within Australia that are listed in the above Schedule, and such other schools, RTO or educational facilities as EREAFSL may establish in Australia or may acquire, govern, and operate from time-to-time. This definition also applies to campuses of Schools and to a School operating across various sites.

