



<b>Policy Name</b>	PRIVACY POLICY AND COLLECTION NOTICES		
<b>Purpose</b>	The Australian Industry Trade College is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act. This statement outlines the privacy policy of the College and describes how the College uses and manages personal information provided to or collected by it.		
<b>Scope</b>	This policy applies across the College to board members, employers, employees, volunteers, parents/guardians and young people, contractors, and people visiting the College site, and describes the type of information the College collects, how the information is handled, how and to whom the information is disclosed, and how the information may be accessed.		
<b>Policy Category</b>	HSSE and Risk		
<b>References</b>	<i>Australian Privacy Principles</i> <i>Privacy Act 1988 (Cth)</i> AITC Child Protection Policy AITC Enrolment Contract AITC Social Media Policy AITC Disability Discrimination Policy (Young People) AITC Workplace Discrimination, Harassment and Bullying Policy		
<b>Key Links</b>			
<b>Status</b>	Approved	<b>Supersedes</b>	5.0
<b>Authorised by</b>	AITC Board	<b>Date of Authorisation</b>	28 Feb 2024
<b>Policy Owner</b>	CEO	<b>Version</b>	6.0
<b>Review Period</b>	1 Year	<b>Next Review Period</b>	2025 - T1

## PRIVACY POLICY AND COLLECTION NOTICES

### 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 the Australian Industry Trade College's (AITC) treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the AITC and employee.

### Policy

This Privacy Policy sets out how the AITC manages personal information provided to or collected by it. The AITC is bound by the Australian Privacy Principles contained in the *Privacy Act*. The AITC may, from time to time, review and update this Privacy Policy to take into account new laws and technology, changes to the AITC's operations and practices, and/or to make sure it remains appropriate to the changing College environment.

### What kind of personal information does the AITC collect and how does the AITC collect it?

The type of information the AITC collects and holds includes (but is not limited to) personal information, including health and other sensitive information, about:

- young people and parents and/or guardians ('Parents') before, during, and after the course of a young person's enrolment at the College:
  - name, contact details (including next of kin), date of birth, gender, language background, and previous school;
  - parents' education, occupation and language background;
  - medical information (e.g. details of disability and/or allergies, absence notes, medical reports 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;
  - court orders;
  - volunteering information;
  - photos and videos at College events; and
  - CCTV footage for safety and security purposes.
- job applicants, employees, 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 College events;
  - workplace surveillance information;
  - work emails and private emails (when using work email address) and Internet browsing history; and
  - CCTV footage for safety and security purposes.
- other people who come into contact with the AITC, including name and contact details and any other information necessary for the particular contact with the College.

For the purposes of this policy, 'You' and/or 'Your' refers to the person whose personal information is provided, collected and/or stored by the AITC, as relevant in the context of the statement.

### Personal information you provide

The AITC will generally collect personal information held about an individual by way of forms filled out by parents or young people, face-to-face meetings and interviews, emails and telephone calls. On occasion, people other than parents and young people may provide personal information.

### Personal information provided by other people

In some circumstances the AITC may be provided with personal information about an individual from a third party, for example, a report provided by a medical professional or a reference from a previous employer / another school.

## How will the AITC use the personal information you provide?

The AITC will use personal information for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

## Young people and parents

In relation to personal information of young people and parents/guardians, the AITC's primary purpose of collection is to enable the College to provide quality industry education to enrolled young people, exercise its duty of care, and perform necessary associated administrative activities, which will enable young people to take part in all College activities. This includes satisfying the needs of parents, the needs of the young people and the needs of the AITC throughout the whole period the young person is enrolled at the College.

The purposes for which the AITC uses personal information of young people and parents include:

- to keep parents informed about matters related to their young person's industry education, through correspondence, newsletters and magazines;
- day-to-day administration of the College;
- looking after the young person's educational, social and medical wellbeing;
- seeking donations and marketing for the AITC; and
- to satisfy the AITC's legal obligations and allowing the College to discharge its duty of care.

In some cases, where the College requests personal information about a young person or parent/guardian, if the information requested is not provided, the College may not be able to enrol or continue enrolment or permit the young person to take part in a particular activity.

On occasions information such as academic and industry achievements, young people activities, and similar news is published in College newsletters and magazines, through official AITC social media accounts, on our intranet and website. This may include photographs and videos of young people activities such as sign-ups, industry placements, camps and excursions. The AITC Enrolment Contract [v2.0, s.9] outlines the matter of consent for the College to use the media of the young person to display at the College or be used in any future advertising and promotional material, including but not limited to newsletters, print, television, social media and internet, without compensation.

## Job applicants, employees and contractors

In relation to personal information of job applicants, employees and contractors, the AITC's primary purpose of collection is to assess and (if successful) engage the applicant, employee or contractor, as the case may be.

The purposes for which the AITC uses personal information of job applicants, employees and contractors include:

- in administering the individual's employment or contract, as the case may be
- for insurance purposes
- seeking donations and marketing for the College

- to satisfy the College's legal obligations, for example, in relation to child protection legislation.

## Volunteers

The AITC also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as Campus Community Committees to enable the AITC and the volunteers to work together.

## Marketing and fundraising

The AITC treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the AITC continues to provide a quality learning environment where both young people and employees thrive. Personal information held by the AITC may be disclosed to organisations that assist in the College's fundraising.

Parents, employees, contractors and other members of the wider College community may occasionally receive fundraising information. College publications, like newsletters and magazines, which may include personal information, may be used for marketing purposes.

If you would like to opt-out of direct marketing, please contact the **Privacy Officer** ([compliance@aitc.qld.edu.au](mailto:compliance@aitc.qld.edu.au)).

## Security – CCTV

The AITC captures CCTV footage that is regularly viewed as part of the security and safety procedures for the College. Where security cameras are in use, appropriate signs are displayed.

Physical, technical and operational safeguards are implemented to ensure the security and adequate protection of the footage, including access permissions, storage and disposal processes, and processes to protect against unauthorised disclosure.

## Who might the AITC disclose personal information to and store your information with?

The AITC may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes. These parties may include:

- another school or employees at another school;
- government departments (including for policy and funding purposes);
- medical practitioners;
- people providing educational, support and health services to the College, 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 the AITC;
- recipients of College publications, such as newsletters and magazines;

- young peoples' parents or guardians;
- anyone you authorise the AITC to disclose information to; and
- anyone to whom we are required or authorised to disclose the information to by law, including child protection laws.

## Sending and storing information overseas

The AITC may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, the AITC 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); and
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

The AITC may use online or cloud service providers to store personal information and provide services to the College 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 the cloud which means that it may reside on a cloud service provider's server which may be situated outside Australia. Cloud services by definition are IT services that are hosted by third-party providers and delivered on-demand to users via internet. It can include Infrastructure, Platforms, Software, Application and other services.

An example of such a cloud service provider is Microsoft. The AITC has implemented Microsoft365 for employees and young people for email, and stores and processes limited personal information for this purpose. School personnel and its service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering Microsoft365 and ensuring its proper use.

The Data centres where the personal information is likely to be kept are located in data centres around the world that are endorsed by Azure, Amazon Web Services (AWS) or Google. If ever available, we will make our preference known to have our data stored in a geographically Australian located Data Centre.

## Sensitive information

In referring to sensitive information, the AITC means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices, or criminal record, that is also personal information, health information and biometric information about an individual.

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

## Management and security of personal information

The AITC's employees are required to respect the confidentiality of young peoples' and parents' personal information and the privacy of individuals. The AITC has policies in place to protect the personal information the AITC 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.

## 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; or
  - 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, financial, as well as serious harm to reputation.

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

If the AITC 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, the AITC will be required to lodge a statement to the Privacy Commissioner (**Commissioner**). Where practical to do so, the College entity will also notify the affected individuals. If it is not practical to notify the affected individuals, the AITC 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 the AITC holds about them, and to advise the AITC of any perceived inaccuracy. There are some exceptions to this right set out in the Act. Young people will generally be able to access

and update their personal information through their parents, but older young people may seek access and correction themselves.

To make a request to access or to update any personal information the AITC holds about you or your child, please contact the **Privacy Officer** ([compliance@aitc.qld.edu.au](mailto:compliance@aitc.qld.edu.au)) in writing. The AITC may require you to verify your identity and specify what information you require. The AITC may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the AITC will advise the likely cost in advance. If the College cannot provide you with access to that information, you will be provided with written notice explaining the reasons for refusal.

The AITC 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 young people

The AITC respects every parent's right to make decisions concerning their child's education. Generally, the AITC will refer any requests for consent and notices in relation to the personal information of a young person to the young person's parents. The AITC will treat consent given by parents as consent given on behalf of the young person and notice to parents will act as notice given to the young person.

As mentioned above, parents may seek access to personal information held by the AITC about them or their child by contacting the **Privacy Officer** ([compliance@aitc.qld.edu.au](mailto:compliance@aitc.qld.edu.au)). 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 AITC's duty of care to a young person.

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

## Enquiries and complaints

If you require further information about the way the AITC manages the personal information it holds, or wish to make a complaint about the AITC's breach of the Australian Privacy Principles, please contact the **Privacy Officer** ([compliance@aitc.qld.edu.au](mailto:compliance@aitc.qld.edu.au)). The AITC will investigate any complaint and will notify you of a decision in relation to your complaint as soon as is practicable after it has been made.

## Contact us

CONTACT	EMAIL	POSTAL ADDRESS
Privacy Officer	<a href="mailto:Compliance@aitc.qld.edu.au">Compliance@aitc.qld.edu.au</a>	PO Box 4777 ROBINA TOWN CENTRE Q 4230

## APPENDIX 1

### Standard collection notice

1. The College collects personal information, including sensitive information about young people and parents or guardians before and during the course of a young person's enrolment at the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to provide schooling to young people enrolled at the College, exercise its duty of care, engage in marketing/fundraising and perform necessary associated administrative activities, which will enable young people to take part in all the activities of the College.
2. Some of the information we collect is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
3. Some of the information we collect is to ensure the safety and security of our young people, employees. This includes the capture and storage of CCTV footage.
4. 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.
5. Health information about young people 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 young people from time to time.
6. The College may disclose personal and sensitive information for educational, legal, administrative, marketing and support purposes. This may include to:
  - a. other schools and teachers at those schools;
  - b. government departments (including for policy and funding purposes);
  - c. medical practitioners;
  - d. people providing educational, support and health services to the College, including specialist visiting teachers, [sports] coaches, volunteers, and counsellors;
  - e. providers of learning and assessment tools;
  - f. assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA);
  - g. people providing administrative and financial services to the College;
  - h. anyone you authorise the College to disclose information to; and
  - i. anyone to whom the College is required or authorised by law, including child protection laws, to disclose the information.
7. Personal information collected from young people is regularly disclosed to their parents or guardians.
8. The College may use online or 'cloud' service providers to store personal information and to provide services to the College 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 servers, which may be situated outside Australia. Further information about the College's use of on online or cloud service providers is contained in the College's Privacy Policy.

9. The College's Privacy Policy, accessible on the College's website, sets out how parents or young people may seek access to and correction of their personal information which the College 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 College's duty of care to a young person, or where young people have provided information in confidence. Any refusal will be notified in writing with reasons if appropriate.
10. The College's Privacy Policy also sets out how parents and young people can make a complaint about a breach of the APPs and how the complaint will be handled.
11. The College 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 College'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.
12. On occasions, information such as academic and industry achievements, young people activities and similar news is published in College newsletters and magazines, on our intranet and on our website this may include photographs and videos of young people activities such as industry sign-up events, camps, and excursions. The College will obtain permissions [annually] from the young person's parent or guardian (and from the young people 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.
13. If you provide the College 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 College and why.

## APPENDIX 2

### Employment collection notice

1. In applying for this position, you will be providing the AITC with personal information. We can be contacted at People Team, [hr@aitc.qld.edu.au](mailto:hr@aitc.qld.edu.au)
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 AITC's Privacy Policy, accessible on the College'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 College 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 collect information under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. The College may use online or 'cloud' service providers to store personal information and to provide services to the College 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 servers, which may be situated outside Australia. Further information about the College's use of online or cloud service providers is contained in the College'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 College and why.

## APPENDIX 3

### Contractor/volunteer collection notice

1. In offering, applying or agreeing to provide services to the College, you will be providing the AITC with personal information.
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. The AITC may also make notes and prepare a confidential report in respect of your application.
3. You agree that the College may store this information for six months.
4. The College's Privacy Policy and Collection Notices, accessible on the AITC 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 College 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. We usually disclose this kind of information to the following types of organisations, e.g., Queensland Government Agencies for Working with Children/Blue Card.
6. We are required to collect information under Child Protection laws. We may also collect personal information about you in accordance with these laws.
7. The College may use online or cloud service providers to store personal information and to provide services to the College 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 servers, which may be situated outside Australia. Further information about the College's use of online or cloud service providers is contained in the College's Privacy Policy and Collection Notices.
8. If you provide us with the personal information of others, it is encouraged that you inform them you are disclosing the information to the College and why.

Review and change register

VERSION	EFFECTIVE DATE	CHANGE HISTORY	AUTHORISED BY
6.0	5 March 2024	The policy was reviewed as part of the standard annual review process. Changes implemented refer to new advice through Independent Schools Queensland as a result of the updated <i>Privacy Compliance Manual</i> developed by Independent Schools Australia and the National Catholic Schools Commission.	
5.0	2 March 2023	The policy was reviewed as part of the standard annual review process including consideration to new data security documentation.  No changes or amendments were required.	AITC Board

Policy approval (current version)

APPROVAL	DATE	SIGNATURE
Endorsed by CEO	23 Feb 2024	NA
AITC Board	28 Feb 2024	Approved at AITC Board Meeting