

Purpose:	Jabiru 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.	
References:	<ul style="list-style-type: none"> ● Australian Privacy Principles ● Privacy Act 1988 (Cth) <p>The updated version of the following Policy or Procedure can be read and acknowledged in your Employment Hero</p> <ul style="list-style-type: none"> ● Child Protection Policy ● Disability Discrimination Policy ● Staff Code of Conduct ● Generative Ai Policy 	
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Review Date:	Annually, as appropriate, to reflect changing legislation and environment.	Next Review Date: December 2026
Policy Owner:	CLL 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 Jabiru Community College's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Jabiru Community College and employee.

Policy

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

What kinds of personal information does the School collect and how does the School collect it?

The type of information Jabiru 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 ('Parents') 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 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 and non-government welfare and support 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, directors, work experience students, 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.

Personal Information provided to the college directly:

Jabiru Community College will generally collect personal information held about an individual by way of forms filled out by Parents or Pupils, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and Pupils provide personal information.

Personal Information provided by third parties:

In some circumstances Jabiru 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 reference from another school.

Personal information generated by artificial intelligence (AI) systems

Jabiru Community College will never enter personal information into an AI system. 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

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

How the School will use personal information collected:

Jabiru Community College will use personal information it collects 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 the person consenting, or to which the person has consented.

Students and Parents

In relation to personal information of students and parents, JCC's primary purpose of collection is to enable JCC to provide schooling to students enrolled at the school, exercise its duty of care, and perform necessary associated administrative activities, which will enable students to take part in all the activities of the school. This includes satisfying the needs of parents, the needs of the students and the needs of JCC throughout the whole period the student is enrolled at the School.

The purposes for which JCC uses personal information of students and parents include:

- to keep parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines

- day-to-day administration of JCC
- looking after student's educational, social and medical wellbeing
- seeking donations and marketing for JCC
- to satisfy JCC's legal obligations and allow the school to discharge its duty of care.

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

On occasions information such as notable achievements, student activities and similar news is published in School newsletters and magazines, on our intranet 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 from the student's parent or guardian (and from the student) upon enrolment agreeing to inclusion of such photographs, videos or other identifying material in our promotional material or otherwise make this material available to the public such as on the internet.

Job applicants, Staff Members and Contractors

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

The purposes for which the School uses personal information of job applicants, staff members 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 School
- to satisfy the School's legal obligations, for example, in relation to child protection legislation.

Volunteers

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

Fundraising

Jabiru 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 Jabiru Community College may be disclosed to organisations that assist in the school's fundraising.

Marketing

Jabiru 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 Jabiru Community College on (07) 3554 1799.

When Jabiru 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, Jabiru Community College will provide an opt-out option.

Automated Decisions

Jabiru Community College may use personal information in the operation of computer programs to make, or assist in making, certain decisions (automated decisions). The personal information used for this purpose is to make participation determinations. The decisions made using this personal information in the operation of computer programs are as follows:

Literacy and Numeracy levels of students prior to commencing Vocational Educational Training (VET), other decisions as notified by us from time to time.

Artificial Intelligence (AI) Systems

Jabiru Community College will not use personal information in connection with an AI tool.

Disclosure and Storage of Personal Information

Jabiru Community College may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes.

This may include:

- 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), the Queensland Curriculum and Assessment Authority (QCAA), and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN)
- People providing administrative and financial services to Jabiru Community College
- Recipients of School publications, such as newsletters and magazines
- Students' parents/carers or guardians
- Anyone parents/carers authorise Jabiru 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

Sending and Storing Information Overseas

Jabiru Community College] may disclose your personal information to overseas recipients in the course of providing services. Under the Privacy Act, Jabiru 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, Jabiru 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, Jabiru Community College continues to assess and ensure that any overseas recipient handles personal information in accordance with the APPs.

Jabiru Community College may disclose personal information about an individual to overseas recipients, for instance, to facilitate a school exchange. However, Jabiru 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.

Jabiru Community College may use online or 'cloud' service providers to store personal information and to provide services to Jabiru Community 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.

Jabiru uses the following cloud services: Google provides 'Google Workspace for Education' (GWS) including Gmail, 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 GWS and ensuring its proper use.

Sentral Student Management System. Through their software offerings, they provide systems to schools with tools that help them manage their operations, including roll marking, case noting, and communication with parents and students. Their users include their Customers (Schools), parents and guardians that engage with their Customers, as well as, where enabled by a parent or guardian, their students (collectively "Users"). Personal information that they receive from their Customers is subject to Privacy Act 1988 (Cth) ("Privacy Act"). Personal information that they receive from their Users is owned by the Users, and only processed by Sentral for student management use.

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

Sensitive Information

In referring to 'sensitive information', Jabiru Community College 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 the person agrees otherwise, or the use or disclosure of the sensitive information is required by law.

Management and Security of Personal Information

Jabiru Community College 's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals. Jabiru Community College has in place steps to protect the personal information Jabiru Community College holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and enforcing its Cyber Security Risk Management Plan (located in your Employment Hero).

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 Jabiru 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 Jabiru Community College will be required to lodge a statement to the [Office of the Australian Information 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, Jabiru 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 Jabiru Community College holds about them and to advise Jabiru 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 Jabiru Community College holds about you or your child, please contact the College Business Coordinator in writing via email to office@jcc.qld.edu.au. Jabiru 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 Pupils

Jabiru Community College respects every parent's right to make decisions concerning their child's education. Generally, Jabiru Community College will refer any requests for consent and notices in relation to the personal information of a student to the student's parents. Jabiru 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 Jabiru Community College about them or their child by contacting the College Business Coordinator (via office@jcc.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 Jabiru 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 Jabiru 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

Pupils, parents and staff can seek further information about the way Jabiru Community College manages the personal information it holds, or make a complaint about Jabiru Community College's breach of the Australian Privacy Principles by contacting the Co-Principals via email to co-principals@jcc.qld.edu.au. Jabiru Community College will investigate any complaint and will notify the complainant of the making of a decision in relation to the 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. We may also collect personal information from third parties such as medical or wellbeing practitioners, or referring agencies.
2. 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.
3. 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.
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 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.
6. A student's enrolment may be delayed or prevented if the School cannot collect certain personal information. This is particularly so where the information is relevant to the health and safety of the student, other students and/or staff.
7. 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.
8. 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 and other coaches, volunteers, and counsellors;
 - providers of learning and assessment tools;
 - assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority (ACARA) and NAPLAN Test Administration Authorities (who will disclose it to the entity that manages the online platform for NAPLAN);

- 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.
9. Personal information collected from students is regularly disclosed to their parents or guardians.
 10. School activities and news (including student achievements) are frequently published in the School's newsletters and magazines, on our Sentral app on our intranet or otherwise shared with the School community (current, future and past students, parents and teachers). This may include personal information (including photographs and videos) of students and parents involved in School activities such as academic and sporting events and achievements, concerts and plays, school camps and school excursions. The School will obtain permissions if we would like to include photographs or views or other identifying material of students (or parents) in our promotional material or otherwise make this material available to the public such as on the internet.
 11. 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 servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy.
 12. The School uses Sentral Student Management System provided by third party service providers. Personal information is stored with and accessible by the third party service provider for the purpose of providing services to the School in connection with Sentral.
 13. 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.
 14. The School uses Google Gemini AI system that are provided by third parties. The school will not under any circumstances enter any student or family personal details into our AI system. These third parties may be located outside of Australia, including in the USA, Taiwan, Singapore, Ireland, Netherlands and Belgium.

Your Rights and How to Complain

15. 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.

16. 16. 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. Complaints can be made by contacting the Co-Principals via email to co-principals@icc.qld.edu.au.
17. 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.
18. We include students' and students' parents' contact details in a class list and School directory that is restricted to authorised staff.
19. 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

Employment Collection Notice

1. In applying for this position, you will be providing Jabiru Community College with personal information. We can be contacted via
 - **Address:**
Jabiru Community College
PO Box 62
Zillmere QLD, 4034
Email: office@jcc.qld.edu.au
Phone: 07 3554 1799
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 including third party providers of the AI systems we use without your consent unless otherwise permitted. We usually disclose this kind of information to the following types of organisations - Payroll, Accounting and Human Resource Management support services.
5. We are required to collect information regarding whether you hold a valid Blue Card or valid registration with the Queensland College of Teachers under Child Protection laws. We may also collect personal information about you in accordance with these laws.
6. We are required to conduct a criminal record check to collect information regarding whether you are or have been the subject of an Apprehended Violence Order and certain criminal offences under Child Protection laws. We may also collect 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 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 School's use of 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.

9. The School uses centralised information management and storage systems (Systems) provided by third party service providers such as Employment Hero. Personal information is stored with and accessible by the third party service providers for the purpose of providing services to the School in connection with the Systems.
10. The School uses Google Gemini AI systems that are provided by third parties. The school will not enter staff personal information into these systems. These third parties may be located outside of Australia, including in the USA, Taiwan, Singapore, Ireland, Netherlands and Belgium.

APPENDIX 3

Contractor/Volunteer Collection Notice

1. In offering, applying or agreeing to provide services to the School, you will be providing Jabiru Community College with personal information. We can be contacted via
 - **Address:**
Jabiru Community College
PO Box 62
Zillmere QLD, 4034
Email: office@jcc.qld.edu.au
Phone: 07 3554 1799
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 7 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, including third party providers of the AI systems we use. We usually disclose this kind of information to the following types of organisations e.g. support vendors that provide services around administration systems.
6. We are required to collect information regarding whether you hold a valid Blue Card or valid registration with the Queensland College of Teachers under Child Protection laws. We may also collect 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 servers which may be situated outside Australia. Further information about the School's use of online or 'cloud' service providers is contained in the School's Privacy Policy. 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.

8. The School uses centralised information management and storage systems (Systems) provided by third party service providers such as Employment Hero. Personal information is stored and accessible by the third party service providers for the purpose of providing services to the School in connection with the Systems.
9. The School uses Google Gemini AI systems that are provided by third parties. The school will not enter your personal information into these systems. These third parties may be located outside of Australia, including in the USA, Taiwan, Singapore, Ireland, Netherlands and Belgium.