



## QUALITY AREA 7: Leadership and Service Management

### 5.13 Privacy Online

Date of Last Policy Review: June 2016

#### INTRODUCTION

Valla Community Preschool recognises and respects the importance of privacy and confidentiality as an individual right and a basis for building partnerships. Our organisation requires personal information from its members, families, staff, management, volunteers, children and the broader education and care community to provide appropriate and responsive service delivery. This policy has been developed with regard to the *Australian Privacy Principles (APPs) (2014)* and pursues the highest standard in the protection and preservation of privacy and confidentiality.

Websites, Blogs and Social Media sites provide information to potential clients on what an organisation offers and how they operate. A website, blog or social media site maintained by the preschool can support families to make informed decisions about education and care and find out more about if a particular service will suit their needs. A website, social media sites, blogs and email may be utilised by Valla Community Preschool to support prospective and enrolled families to communicate and share information. Families are also able to gain contact information or request further information through emails. means of providing information to the preschool community.

#### GOALS - What are we going to do?

##### ***Valla Community Preschool will:***

- ◆ Use email as a means of communicating newsletters and other important information about the service and the services provided by the preschool.
- ◆ Ensure our website and social media site will be maintained to inform families about the preschool and the services provided by the organisation;
- ◆ Maintain private and confidential files for our members, customers, staff, management, volunteers, children and the broader education and care community. We will continue to improve systems for the appropriate use, storage and disposal of records.
- ◆ Ensure that information is used only for the provision of services by Valla Community Preschool, and only shared with relevant organisations as defined in this policy and in our Privacy Collection Statement.
- ◆ Respect the privacy of all stakeholders, and will seek to keep all records private and confidential and maintain records according to the *Australian Privacy Principles* and the *Education and Care Services National Regulations*.
- ◆ Educators participating in social media connected with their work as early childhood educators, will consider what information they offer and ensure that they do not disclose or publish any information or photos related to the preschool, other educators, staff, children or families without written consent from that individual or family or the Management Committee or Nominated Supervisor (as relevant);

#### STRATEGIES - How will it be done?

Valla Community Preschool aims to meet these goals through the adoption of this specific Privacy and Confidentiality policy and our Privacy Collection statement which will guide our practices in this area.

- ✓ Education and Care Services National Regulations 2011: 181
- ✓ Link to National Quality Standard: 7.3.5

## Collection of Information

- Ensure that its stakeholders and the broader education and care community has access to our privacy collection statement that includes details about how they can access their personal information, have this corrected as needed, make a complaint about a breach of privacy, if one occurs.
- Ensure each staff member, committee members, volunteers and child information is correct in personnel and other files. This includes information on qualifications, WWCC, criminal history checks, staff entitlements, contact and emergency information, health and immunisation information, and any relevant medical and legal information. This would include any other relevant information collected by the service.
- Ensure that information collected from individuals, members and the community is maintained in a private and confidential manner at all times.
- Ensure that such information is not divulged or communicated (directly or indirectly) to anyone except:
  - to the extent necessary for the provision of services by Valla Community Preschool;
  - to the Government Departments as required under Funding Agreements;
  - as authorised, permitted or required to be provided under any act or law; and
  - with written consent of the person who provided the information.
- Provide individuals and services with information on the complaints procedure if any privacy or confidentiality procedure has been breached. Individuals can make a complaint to the Valla Community Preschool Management if they believe there has been a breach of their privacy in relation to the Privacy principles. The breach will be assessed by Valla Community Preschool within 14 days. Where the information collected is incorrect, the information will be corrected. Where a serious breach of privacy is found, appropriate actions will be negotiated between the Management and the individual to resolve the situation, in line with the complaints procedure.
- Will ensure information provided by individuals, staff and committee members is only used for the purpose it was collected for.
- Ensure each individuals and services information is correct in organisational records. This includes information on immunisation updates, income and financial details (credit card or bank information), contact details of family and emergency contact information, and any medical or legal.
- Provide individuals and services with details on the collection of personal information collected: This information will include:
  - the types of information collected by the organisation;
  - The purpose of collecting information;
  - What types of information will be disclosed to the public or other agencies; and when and why disclosure may occur;
  - How information is stored at Valla Community Preschool:
  - Approaches used to keep information secure;
  - Who has access to the information;
  - The right of the individual to view their personal information;
  - the length of time information needs to be archived; and
  - How information is disposed.

## STATUTORY LEGISLATION & CONSIDERATIONS

- ✓ Children (Education and Care Services National Law Application) Act 2010
- ✓ Education and Care Services National Regulations 2011
- ✓ Australian Privacy Principles 2014
- ✓ ECA Code of Ethics 2006

## KEY SOURCES

- ✓ Children (Education and Care Services National Law Application) Act 2010
- ✓ Education and Care Services National Regulations 2011
- ✓ Australian Privacy Principles [www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles](http://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles)
- ✓ Department of the Officer of the Privacy Commissioner - [www.privacy.gov.au](http://www.privacy.gov.au)
- ✓ Early Childhood Australia - [www.earlychildhoodaustralia.org.au](http://www.earlychildhoodaustralia.org.au)
- ✓ ECA Code of Ethics 2006
- ✓ Australian Legal Information Institute- [www.austlii.edu.au](http://www.austlii.edu.au)

## REVIEW

All information pertaining to the centre, the staff and families will be maintained in a private and confidential manner in accordance with the *Information Protection Principles (IPPs) (2003)*. This policy will be reviewed and updated at least every two years.

## Storage of Information

- Ensure all records are stored securely, reducing the chance of unauthorised access, use or disclosure and remains private and confidential within the organisation at all times.

## Access to Information

- Ensure that information kept is not divulged or communicated, directly or indirectly, to anyone other than as permitted under any Act or Law or Funding Agreement.
- Individuals will be allowed access to their personal information as requested. Individuals must request this information in writing from the organisation
- Information may be denied under the following conditions:
  - Access to information could compromise the privacy of another individual;
  - The request for information is frivolous or vexatious; and
  - The information relates to legal issues, or there are legal reasons not to divulge the information.

## Staff will:

- Maintain individual and service information and store documentation according to this policy at all times.
- Not share information about the individual or service, management information, or other staff, other than as allowed in this policy or as per legislative authority.

## EVALUATION

All information pertaining to the members, customers, staff, management, volunteers, children and the broader education and care community is maintained in a private and confidential manner in accordance with the Commonwealth Privacy Act 1988. Statutory Legislation & Considerations | Australian Privacy Principles [www.oaic.gov.au](http://www.oaic.gov.au) | Office of the Australian Information Commissioner – [www.oaic.gov.au](http://www.oaic.gov.au) | Privacy Act 1988 (Privacy Act) [www.oaic.gov.au/law/act/2/2](http://www.oaic.gov.au/law/act/2/2)