

Policy Statement

Activity Centres Incorporated (Organisation) and our related entities appreciate that privacy is very important. The Organisation has adopted this Privacy Policy as we recognise the right of people to keep their sensitive information private. It is critical to maintain the trust of Staff, children, families and the wider community that we maintain this information in a professional manner. This Privacy Policy covers the Organisations treatment of personally identifiable information that we collect or hold. Like many other Organisations, Activity Centres Inc must comply with the National Privacy Principles contained in the Australian Privacy Act when dealing with personal information. This policy outlines our commitment to our employees, children and families regarding how we handle this information. Every employee, vendor, contractor, supplier or representative must be aware of this policy and ensure that proper controls are applied to ensure the information is kept safe.

Considerations

- ✓ Federal Privacy Act 1988
- ✓ Privacy and Personal Information Protection Act NSW 1998
- ✓ Australian Privacy Principles 2014.
- ✓ Child Care Benefit legislation 4.8, 6.5.
- ✓ National Quality Standards 4.2, 5.1, 7.1
- ✓ Quality Areas (National Quality Framework 2011) 2.1, 8.1.
- ✓ Network OSCH Code of Conduct
- ✓ Network Record keeping factsheet
- ✓ Education and Care Services National Regulations 2011 145-152, 168, 174-177, 181, 183 (current version 1 February 2018)

Collection Of Information

- ✓ Information we gather is vital to the operation of the Organisation and to ensure that we comply with regulations, legislation, and business requirements. The information collected may include some sensitive information (as defined by the Privacy Act). Information can be sensitive due to regulations and industry standards.
- ✓ Personal information must only be collected for the purposes necessary for the function and activities of the service and Organisation and only by means that are permissible by law.
- ✓ The types of sensitive information that we collect from families and Staff may include:
 - Employment Records (recruitment, terms and conditions, performance, discipline and resignation)
 - General information eg: name, address, date of birth, contact details etc
 - Health Information (allergies, conditions, etc)
 - Financial Information (credit cards, salaries, banking, transactions and more)
 - Organisation Business plans and other intellectual property.
 - Information about your beliefs, relevant to the services or assistance you have requested from the Organisation.
- ✓ Information will be collected via online enrolment program, email, letters, written correspondence, verbal interactions and other forms of communication.
- ✓ The information may reside on our computing systems or backup devices, accessed through our networks, or be on paper. Information locations must be approved by Management and remain in approved locations only.
- ✓ All sensitive information is kept in locked cabinets or through password protected programs and software.
- ✓ Where practicable, the purpose for which we collect personal information will be made clear at the time of collection. If you do not provide us with certain information we may be unable to provide you with access to some of our services or the assistance you have requested.
- ✓ Where reasonably possible, the Organisation will only collect information directly from the individual or family to whom the information relates. The individual or family may authorise the collection of information from a third party in writing.
- ✓ Users can generally visit the Organisations website without revealing who they are or other personal information unless they log on or register with us. The Organisation will not collect any personal information about visitors to the website except when they knowingly provide it.

How We Use Your Information

- ✓ The Organisation will use the personal information we collect for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy.
- ✓ We will not use personal information for any other purpose without first seeking consent, unless:

- directed by a court of law;
 - it is to prevent or lessen a serious and imminent threat to the life or health of the individual the information relates to.
 - If the Organisation uses or discloses information, as authorised above, we will make written note of the use of disclosure and the reason for its disclosure.
- ✓ Generally we will only use and disclose personal information, **with consent**, as follows:
- to establish and maintain your involvement with the Organisation, including providing you with Facebook updates, memos;
 - to provide the products or services that have been requested from the Organisation;
 - to answer enquiries;
 - to register individuals for events, conferences or promotions;
 - to assist us to make the Organisations sites, services and products more valuable to our community;
 - for direct promotion of products or services and to keep you informed of new developments we believe may be of interest to you. If we contact you in this way without obtaining your prior consent, we will provide you with the opportunity to decline any further promotional communications;
 - to third parties where we have retained those third parties to assist us to operate the Organisation and provide the products or services requested, such as education instructors, catering and event coordinators, promotions companies, transport providers, health care providers, website hosts and IT consultants, and our professional advisers such as consultants, lawyers and accountants. In some circumstances we may need to disclose sensitive information to third parties as part of the services requested; and
 - to different parts of the Organisation to enable the development and promotion of other products and services and to improve our general ability to assist Organisation attendees and the wider community.

Access To Your Information

- ✓ All current employees will have access to various information dependent on their role within the Organisation.
- ✓ Information is only to be accessed from authorised devices and at authorised locations. No information is permitted to be accessed or taken off sight of ACI Services and locations.
- ✓ Individuals and families can request access to the information that the Organisation holds about themselves or their family by contacting the Organisations Privacy Officer as set out below. We will provide access to personal information unless we are legally authorised to refuse your request, and within the presence of a member of Management Staff.
- ✓ If you wish to change personal information that is out of date or inaccurate at any time please contact us in writing. Families can inform us of changes through using their personal log in of our current enrolment system and Staff need to email Management.
- ✓ Archiving of personal information will be kept for the relevant period as per Regulation 183 of the Education and Care Services National Regulations.
- ✓ We may refuse your request to access, amend or delete your personal information in certain circumstances. If we do refuse your request, we will provide you with a reason for our decision and, in the case of amendment, we will note with your personal information that you have disputed its accuracy.

Security

- ✓ The Organisation will take reasonable steps to keep secure any personal information which we hold and to keep this information accurate and up to date. Personal information is stored in a secure server or secure locked files.
- ✓ The Organisation utilises a third party provider in QK Technologies. Their Privacy Policy can be viewed on their website.
<http://www.qikkids.com.au/qk-technologies-privacy-policy>

Changes to this Privacy Policy

The Organisation may amend this Privacy Policy from time to time by having the amended version available at the information counters at the Services or on our website at www.activitycentres.com.au. We suggest that you visit our website regularly to keep up to date with any changes.

Complaint

If you have concerns about how Activity Centres Incorporated has handled your information or believe there has been a breach of the Australian Privacy Principles, you can raise this with Activity Centres Inc.

By email: admin@activitycentres.com.au

By post: Privacy Contact Officer
Activity Centres Inc
PO Box 768
Toongabbie NSW 2146

Checklist for Staff

- Make sure personal information is kept secure.
- Make sure information is accurate and up to date.
- The purpose for which we collect personal information will be made clear at the time of collection

_____end of policy_____

Policy is only endorsed if initialled by 2 members of the Management Committee

Endorsed by the Management Committee on the 07th February 2018

Privacy Policy is to be reviewed by the 07th February 2019