
Policy Statement

Activity Centres Incorporated and our related entities appreciate that privacy is very important. We have adopted this Privacy Policy as we recognise the right to keep personal 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 treatment of personally identifiable information that we collect or hold. 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.

Collection Of Information

- ✓ Information we gather is vital to our operation 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 Organisation and only by means that are permissible by law.
- ✓ The types of sensitive information that we collect from families, employees and volunteers 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, medical conditions, etc)
 - financial Information (credit cards, salaries, banking, transactions and more)
 - business plans and other intellectual property
 - information about your beliefs, relevant to the services or assistance you have requested
- ✓ 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 web based software or be on paper. Information locations must be approved by Management and remain in approved locations only.
- ✓ All sensitive information will be kept in locked cabinets or through password protected programs, software and websites.
- ✓ 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, we 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 visit our website without revealing who they are or other personal information unless they log on or register with us. We will not collect any personal information about visitors to the website except when they knowingly provide it.

How We Use Your Information

- ✓ We 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 we use or disclose information, as authorised above, we will make written note of the use of disclosure and the reason for its disclosure
- ✓ We will only use and disclose personal information, with consent, as follows:
 - to establish and maintain your involvement with us
 - to provide the products or services that have been requested from us
 - to answer enquiries
 - to register individuals for events, conferences or promotions
 - to assist us to make our 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 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
- 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 attendees and the wider community

Access To Your Information

- ✓ All current employees will have access to various information dependent on their role.
- ✓ 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 we hold about them or their family by contacting the 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.
- ✓ If you wish to change personal information that is out of date or inaccurate, 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. Some archiving is done electronically.
- ✓ 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

- ✓ We 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.
- ✓ We utilise 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>
- ✓ Our IT is managed and maintained by an external contractor – Tech Remedy
- ✓ We use Microsoft SharePoint as a secure platform for shared access, interaction, and collaboration.

Deletion of Private Information

- ✓ We take reasonable steps to destroy or permanently de-identify personal information no longer needed for any purpose for which the information may be used or disclosed under the Privacy Act.

Changes to this Privacy Policy

- ✓ We may amend this Privacy Policy from time to time by having the amended version available 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.

Complaints

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

Considerations

Education and Care Services National Law

170	Offence relating to unauthorised persons on education and care service premises
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Education and Care Services National Regulations

Reg 111	Administrative Space
Reg 145	Staff Record
Reg 146	Nominated Supervisor
Reg 147	Staff Members
Reg 148	Educational Leader
Reg 149	Visitors and Students
Reg 150	Responsible Person
Reg 151	Record of educators working directly with children
Reg 158	Children's attendance record to be kept by approved provider
Reg 160	Child enrolment records to be kept by approved provider and family day care educator
Reg 161	Authorisations to be kept in enrolment record
Reg 162	Health information to be kept in enrolment record
Reg 181	Confidentiality of records kept by Approved Provider
Reg 183	Storage of records and other documents
Reg 184	Storage of records after service approval transferred

Education and Care Services National Quality Standards

Quality Area	Standard	Element
QA 4 Staffing Arrangements	4.2 Professionalism	4.2.2 Professional standards
QA 6 Collaborative partnerships with families and communities	6.1 Supportive relationships with families	6.1.1 Engagement with the service
	6.2 Collaborative partnerships	6.2.2 Access and participation
QA 7 Governance and Leadership	7.1 Governance	7.1.2 Management systems

Activity Centres Inc. Policies and Procedures

Code of Conduct – Staff, Management Committee, Volunteers and Students	Security
Communications	Social Media
Information Exchange	Staff Professionalism
Responsible Person	

My Time, Our Place

<u>Learning Outcome 1</u> Children have a strong sense of identity	<ul style="list-style-type: none"> Children feel safe, secure and supported
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Legislation

Commonwealth Privacy Act 1988	

Australian Privacy Principles - summary

Principle	Title	Purpose
APP 1	Open and transparent management of personal information	Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date Privacy Policy.
APP 2	Anonymity and pseudonymity	Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.
APP 3	Collection of solicited personal information	Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of "sensitive" information.
APP 4	Dealing with unsolicited personal information	Outlines how APP entities must deal with unsolicited personal information.
APP 5	Notification of the collection of personal information	Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.
APP 6	Use or disclosure of personal information	Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.
APP 7	Direct marketing	An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.
APP 8	Cross-border disclosure of personal information	Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas
APP 9	Adoption, use or disclosure of government related identifiers	Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.
APP 10	Quality of personal information	An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose, the use or disclosure.
APP 11	Security of personal information	An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.
APP 12	Access to personal information	Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.
APP 13	Correction of personal information	Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.

end of policy

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

Endorsed by the Management Committee August 2021
Privacy Policy is to be reviewed by August 2026