



## Outside School Care NT

### OSC-NT PS 36. – Privacy Policy

Policy Description:	The following policy outlines the principles applied to ensure that our dealings with parents, children and third parties respect privacy and maintain confidentiality and are in line with the provisions of the Australian <b>Privacy Act 1988</b> .
Key Points	Although, as a small business entity under turnover of \$3 million per annum – <b>Outside School Care NT</b> is not legally required to apply the provisions of the Act – however we have voluntarily opted in to do so.
1.0 What are your rights under the Privacy Act	<p>The <b>Privacy Act 1988 (Privacy Act)</b> regulates the way in which the personal information of individuals is handled.</p> <p>As an individual, the Privacy Act gives you greater control over the way that your personal information is handled. <b>The Privacy Act</b> allows you to:</p> <ol style="list-style-type: none"><li>know <u>why</u> your <b>personal information</b> is being collected, <u>how</u> it will be used and <u>who</u> it will be disclosed to</li><li>ask for <b>access</b> to your records (including your health information)</li><li><b>stop receiving</b> unwanted direct marketing material</li><li><b>correct</b> inaccurate information about you</li><li>make a <b>complaint</b> about an agency or organisation, if you think that they have mishandled your personal information.</li></ol>
2.0 The reasons <b>why</b> we hold information	<p>The <b>main reasons</b> for which we collect information about you and your child:</p> <ol style="list-style-type: none"><li>For <b>regulatory compliance</b>. In order to maintain a regulatory compliant child service we must collect and have available at all times certain information (for example emergency contacts)</li><li>For <b>health and safety reasons</b>. We must hold information about you and your child if there are medical conditions of which we must be aware in order to provide quality care to your child. We also must keep records of incidents that may occur at our service that involve your child</li><li>For <b>child care management system</b> requirements. In order to ensure your account is credited with the correct child care benefit/ rebates we must hold correct information required by Centrelink.</li><li>For <b>marketing and informational purposes</b>. For example, Parent newsletters other news and information about our services</li></ol> <p>The <b>main reasons</b> for which we collect information about our staff:</p> <ol style="list-style-type: none"><li>For <b>regulatory compliance</b>. In order to maintain a regulatory compliant child service we must hold valid and up to date information about our staff's qualifications and security clearances to work in child care</li></ol>
3.0 The <b>types</b> of information we hold	<p>The <b>types of information</b> we hold include:</p> <ol style="list-style-type: none"><li><b>Contact</b> Information. This includes: names, addresses, phone numbers and emails, copies of driving licences</li><li><b>Health and medical</b> information. This includes: immunisation forms, details of medical conditions and action plans*</li><li><b>Centrelink</b> information. This includes: CRN numbers and CCB/CCR percentages</li><li><b>Custodial</b> information. Court orders and share access agreements</li><li><b>Regulatory</b> information. This includes: incident forms</li><li><b>Programming</b> information. This includes: learning stories, observations and assessments</li></ol>

	<p>7. <b>Photographic</b> images. Digitally stored photographic images taken while in our care</p> <p>*certain medical conditions will require the information be shared with staff members, children and other parents – were applicable (eg. Nut allergy)</p>
<p>3.0 The national privacy principles (NPPs)</p>	<p>There are <b>ten NPPs</b> that regulate how private sector organisations manage personal information. They cover the collection, use and disclosure, and secure management of personal information. They also allow individuals to access that information and have it corrected if it is wrong.</p> <p><b>NPP 1: collection</b></p> <p>Describes what an organisation should do when collecting personal information, including what they can collect, collecting from third parties and, generally, what they should tell individuals about the collection.</p> <p><b>NPP 2: use and disclosure</b></p> <p>Outlines how organisations may use and disclose individuals' personal information. If certain conditions are met, an organisation does not always need an individual's consent to use and disclose personal information. There are rules about direct marketing.</p> <p><b>NPPs 3 &amp; 4: information quality and security</b></p> <p>An organisation must take steps to ensure the personal information it holds is accurate and up-to-date, and is kept secure from unauthorised use or access.</p> <p><b>NPP 5: openness</b></p> <p>An organisation must have a policy on how it manages personal information, and make it available to anyone who asks for it.</p> <p><b>NPP 6: access and correction</b></p> <p>Gives individuals a general right of access to their personal information, and the right to have that information corrected if it is inaccurate, incomplete or out-of-date.</p> <p><b>NPP 7: identifiers</b></p> <p>Generally prevents an organisation from adopting an Australian Government identifier for an individual (e.g. Medicare numbers) as its own.</p> <p><b>NPP 8: anonymity</b></p> <p>Where possible, organisations must give individuals the opportunity to do business with them without the individual having to identify themselves.</p> <p><b>NPP 9: transborder data flows</b></p> <p>Outlines how organisations should protect personal information that they transfer outside Australia.</p> <p><b>NPP 10: sensitive information</b></p> <p>Sensitive information includes information such as health, racial or ethnic background, or criminal record. Higher standards apply to the handling of sensitive information.</p>
<p>4.0 How we maintain privacy</p>	<p>The ways in which we ensure that we are compliant in terms of the information that we hold and the ways it is stored include the following:</p> <ol style="list-style-type: none"> <li>1. <b>Password protected and restricted logon access</b> to our childcare management software – which also includes audit information about who accessed the system and which areas of the system were accessed</li> <li>2. <b>Secure storage</b> of enrolment and other related personal information. All hard copy enrolment information is secured under lock and key in secure drawers or rooms</li> </ol>

	<p>3. <b>Staff conditions of employment.</b> Our terms of employment for all staff require them to treat information that they may be required to have access to in order to undertake their job <b>MUST</b> be treated confidentially</p>
5.0 Our responsibilities to families and staff	We undertake to follow the provisions of the Privacy Act 1988 and will not share or distribute personal information <b>UNLESS</b> required to do so by law or in at the request of health or other governmental agencies made in a formal manner.
6.0 Privacy and use of images of children in our care	<p>Photographic images of children attending our services will be taken and held for the following purposes:</p> <ol style="list-style-type: none"> <li>1. <b>Educational Programming</b> and the evidential documentation required by Licensing authorities</li> <li>2. For our <b>website</b> and <b>marketing collateral</b>.</li> </ol> <p>Written Parent/Guardian authorisation will always be obtained before photographic images are reproduced publically. This will include parental consent provided on our enrolment form</p>
Related Procedures:	
Related Checklists and Logbooks:	
Specific Information for Parents:	
Sources/References:	<p><a href="http://www.oaic.gov.au/privacy">http://www.oaic.gov.au/privacy</a></p> <p><a href="http://www.comlaw.gov.au/Details/C2008C00586">http://www.comlaw.gov.au/Details/C2008C00586</a></p> <p>Outside School Care NT Staff Handbook (2013)</p>
Version Control/Updates:	<p>Version: 2.0 January 2014</p> <p>To be reviewed and updated by: June 2014</p>