



Privacy & Confidentiality Policy

November 2014

SCOPE:

This policy applies to all information provided by **Personnel, Members, Families** and the **Community** of **PCCM**, regardless of format (physical or electronic) or location (in the Office, online, offline or in transit) and specifically includes information obtained or shared through Newsletters and other publications, including social media sites such as Facebook.

RELEVANT INSTRUMENTS:

1. Funding Agreement regarding funding under the Community Support Program: Terms & Conditions. Retrieved 15 June 2014, from:
http://docs.education.gov.au/system/files/doc/other/funding_agreement_regarding_funding_under_the_community_support_program_terms_and_conditions_0.pdf
2. Activity Schedule for Budget Based Funded Child Care Services. Current version.
3. *Privacy Act 1988 (Cth)*. Retrieved 15 June 2014, from:
<http://www.comlaw.gov.au/Details/C2014C00076>
4. *Archives Act 1983 (Cth)*. Retrieved 15 June 2014, from :
<http://www.comlaw.gov.au/Details/C2013C00580>
5. Crimes Act 1914 (Section 70 & 79)
6. Constitution of Paroo Contact Children's Mobile Incorporated 1996 (12 March 2012)
7. Education & Care Services National Regulations 2011
8. National Quality Framework, 4.2.1 (2010)

RATIONALE:

PCCM recognises and respects the importance of privacy and confidentiality as an individual right and a basis for building partnerships. Our **Service** requires personal information from families to provide appropriate and responsive programs. Personal information is collected from **Personnel** and **members** to enable Human Resource and Association management. This policy has been developed to comply with the Australian Privacy Principles (APPs) (2014) and pursues the highest standard in the protection and preservation of privacy and confidentiality. Adherence to this policy will ensure that all

information and records held within the **Service** regarding its **Personnel, Members, Families and Children** is handled in confidence as required by relevant regulation and legislation.

PRACTICES:

Privacy and confidentiality will be ensured through the adoption of this specific *Privacy and Confidentiality Policy* and our *Privacy Collection Statement* which will guide our practices in this area.

PCCM will:

1. maintain private and confidential files for **Personnel, Members, Families and Children**. We will ensure that information collected is maintained in a private and confidential manner at all times by developing systems for the appropriate use, storage and disposal of records.
2. ensure the information in these files is used only for the education and care of the child enrolled in the service, and only shared with relevant or authorised people as defined within authorisations of the Education and Care Services National Regulations.
3. ensure all recorded **Personnel, Members, Families and Children's** information is correct. This includes information on qualifications, WWCC, criminal history checks, staff entitlements, contact and emergency information, health and immunisation information, any relevant medical and legal information and any other relevant information collected by the **Service**.
4. ensure that such information is not divulged or communicated (directly or indirectly) to another person other than the ways outlined as appropriate in the Education and Care Services National Regulations, 181, which says information can be communicated:
 - a) to the extent necessary for the education, care or medical treatment of the child;
 - b) to the parent of the child to whom the information relates (except for information in staff records);
 - c) to the regulatory authority or an authorised officer;
 - d) as authorised, permitted or required to be given by or under any act or law; and
 - e) with written consent of the person who provided the information.
5. ensure that all **Personnel, Members and Families** are provided with a *Privacy Collection Statement* and *Grievance Policy* upon enrolment, that includes details about how they can access their personal information, have this corrected as needed or make a complaint about a breach of privacy, if one occurs.

ABBREVIATIONS:

PCCM – Paroo Contact Children's Mobile Incorporated

DEFINITIONS:

Children: All children, 0-12 years, who are enrolled at the **Service**, children of **Families** or **Members** utilising the **Service**.

Community: Includes all individuals and organisations with which **PCCM** forms a relationship within the **Service** region and beyond.

Families: All families using the **Service**, regardless of how that family is structured.

Members: All current members of Paroo Contact Children's Mobile Inc. other than the Management Committee.

Personnel: all permanent, temporary and casual staff, volunteers, student placements and the Management Committee.

Service: Paroo Contact Children's Mobile Incorporated.

RELATED POLICIES:

Ethical Conduct Policy V2 (Oct 2014)

Grievance Policy V2 (Oct 2014)

Record Keeping Policy (V1 April 2012)

Staff Discipline Policy (V1 Feb 2008)

Staff Employment Policy (V3 Sep 2015)

VERSION CONTROL:

This version supersedes:

1. Confidentiality (March 2012)
2. Confidentiality Policy (April 2012)

Ratified: 14/11/2014 by PCCM Management Committee

Review Date: 2019 [5 years after ratification], or as required due to legislation, regulation or constitution changes.