



JUMBUNNA COMMUNITY PRESCHOOL AND EARLY INTERVENTION CENTRE INC.

QUALITY AREA 7: GOVERNANCE and LEADERSHIP

PRIVACY ONLINE

Date Approved: 30/6/2017

INTRODUCTION

Websites and social media sites can provide information to potential clients on what an organisation offers. A website maintained by Jumbunna can support families to make informed decisions about education and care and find out more about if Jumbunna will suit their requirements. Families are also able to gain contact information or request further information through emails. Social media may be utilised to support enrolled families to communicate and share information.

ACTIONS - What we are going to do?

Jumbunna's website is maintained to inform families about the activities and the service provided by the organisation. Jumbunna respects the privacy of educators, children and families. The service seeks to keep all records private and confidential and maintains records according to the *National Privacy Principles and the Education and Care Service National Regulations*. Jumbunna develops guidelines with the educators in regard to social media participation connected with their work as early childhood educators.

PROCEDURES - How it will be done?

- We will work to ensure that no confidential information can be gained from Jumbunna's websites through our systems and processes. Individuals and services are not obliged to give personal information through the website. However, if an individual chooses to provide information to service via email, that information will remain confidential.
- Ensure that information gained via email can only be used by relevant staff or management to contact a person, offer or send information about the service and request feedback on the website or the education and care service.
- Ensure that the information gained about users from the website will only be used for statistical research for Jumbunna to ascertain future development of the website. Encourage families and educators to give feedback on the website and how it can be improved to meet the needs of the community.
- Not disclose or publish any information related to educators, children or families without written consent from that individual or their family.
- Develop guidelines for educators regarding their participation with families currently connected with the education and care service on social media sites such as Facebook and Twitter.

Our websites and the use of cookies

We use our best efforts to ensure that information received via our website remains secured within our systems. We are regularly reviewing developments in online security; however, users should be aware that there are inherent risks in transmitting information across the internet.

We use cookies on our website. Cookies can make using our website easier by storing information about your preferences and enabling you to take full advantage of our services. Cookies are very small text files that a website can transfer to your computer's hard drive or portable electronic device's memory for record keeping.

We may also use Cookies so that we can determine which parts of our websites are visited most often, or whether you visited our site from a banner advertisement for one of our products or services on another party's website, and other sites you may visit from our Websites.

Sometimes Cookies are used by a third-party service provider with whom we have an agreement to monitor the success of our marketing campaigns. The third-party service provider uses the Cookies to collect information such as when you visited our site, your browser type and the server that your computer is logged in to.

The information is used in an aggregate form and generally no personal information is collected by the third-party service provider. Our agreements with these third parties ensure this information is only used to carry out functions on our behalf, and if any personal information is collected the confidentiality of that information is maintained.

We may also use Cookies so that we can see which parts of our websites you visit when you access those Websites. We may use this information for marketing products and services to you. We keep this information confidential and we do not disclose it to third parties.

Most internet web browsers are pre-set to accept Cookies to enable full use of websites that employ them. However, if you do not wish to receive any Cookies on an internet web browser you may configure your browser to reject them or receive a warning when Cookies are being used. In some instances, this may mean that you will not be able to use some or all of the services provided on our websites. However, you may still be able to access information-only pages.

How we manage a data breach

A data breach occurs when personal information is lost or subjected to unauthorised access, modification, use or disclosure or other misuse.

Data breaches can be caused or exacerbated by a variety of factors and give rise to a range of actual or potential harms to individuals, agencies and organisations.

In the event of any suspected data breach, the matter will be investigated to determine:

- The nature of the breach
- The number of people impacted
- The nature of the breach and extent to which an individual or group may be harmed by the breach
- Remedial action to minimise or prevent impact
- Review of systems to minimise the possibility of future similar breach

De identification and destruction of records

When your child/children leave our service, the following documents and records must be retained by law for the periods of time listed. At the conclusion of that period, the documents and record will be de identified and destroyed.

Type of record	Timeframe	Reference
Child Assessments	Until 3 years after child's last attendance	Regulation 74, 183
Incident, injury, trauma and illness records	Until the child is 25 years old	Regulation 87, 183
Medication record	Until 3 years after child's last attendance	Regulation 92, 193
Child's Attendance	Until 3 years after child's last attendance	Regulation 158-159, 183
Child enrolment	Until 3 years after child's last attendance	Regulation 160, 183
Death of a child while being educated and cared for by the service	Until 7 years after child's last attendance	Regulation 12, 183
Staff record	Until 3 years after child's last attendance	Regulation 145
Record of access to early childhood teacher	Until 3 years after child's last attendance	Regulation 152
Record of educators working directly with children	Until 3 years after child's last attendance	Regulation 151
Record of volunteers and students	Until 3 years after child's last attendance	Regulation 149

The Nominated Supervisor or delegate will:

- Follow guidelines for educators regarding their participation with families currently connected with the education and care service on social media sites such as Facebook and Twitter.

Evaluation

Jumbunna's website is an information resource available to prospective families as well as current families and educators and abides by current legislation. The privacy and protection of children, families and educators is not compromised by participation on social media.

Privacy concerns, complaints or changes to your information

If you have concerns, wish to make a complaint regarding the handling of your personal information by us or if you would like to correct information we currently hold, please contact the services General Manager on (02) 66622866.

If you are not satisfied with the response provided, you may refer your complaint directly to:

Office of the Australian Information Commissioner
 Phone: 1300 363 992
 Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

Further information about privacy

You can find more information about privacy (including information about specific issues, answers to frequently asked questions and links to the 13 Australian Privacy Principles) on the Office of the Privacy Commissioner's website at <http://www.oaic.gov.au/External Link>

Statutory Legislation & Consideration

- Privacy Act 1988 – www.privacy.gov.au/law/act
- Privacy Amendment Private Sector Act 2000
- National Privacy Principles – www.privacy.gov.au/materials/types/infosheets/view/6583
- Privacy and personal information Protection Act 1998
- ECA – Code of Ethics
- Children (Education and Care Services National Law Application) Act 2010
- Education and Care Services National Regulations
- Guide to the National Quality Standard (3) ACECQA (2011)
- Children and Young Persons (Care and Protection) Act 1998
- Children (Education and Care Services) Supplementary Provisions Regulation 2019
- Children (Education and Care Services) Supplementary Provisions Act 2011

Sources

- Office of the Australian Information Commissioner – www.privacy.gov.au
- Australian Legal Information Institute – www.austlii.edu.au
- Early Childhood Australia – www.earlychildhoodaustralia.org.au
- Guide to developing a Social Media Policy – www.inc.com/guide/2010/05/writing-a-social-media-policy.html

Links to other policies

- Child Protection
- Staff Code of Conduct
- Guidelines & Agreements for Enrolment
- Confidentiality
- Privacy and Confidentiality Statement

Links to education and Care Services National Regulations: Schedule 1 177-184

Links to National Quality Standards/Elements: 2.3, 4.2, 6.1, 7.3.1, 7.3.5

DOCUMENTATION

Documents related to this policy	
Related policies	
Forms, record keeping or other organisational documents	

Policy Name:	Privacy Online	Policy Number:	
Date Approved:	24 August 2023	Approved By:	Board of Management
Date Issued:	31 August 2023	Review Date:	30 June 2024
Version 1.5	This version of the policy was approved 24 August 2023 and replaces the version approved 30 June 2022		