# **Information Handling and Privacy Policy**



#### The Infants' Home Child and Family Services

#### Current as at: August 2018

#### Rationale

The Infants' Home Child and Family Services is committed to protecting the privacy of the personal information it collects and receives.

#### Aim

This document sets out how we handle personal information, including the collection, storage, use and disclosure of personal information, and how people can access and change their information, provide us with feedback or make a complaint.

#### **Collection of Personal Information**

## This policy relates to:

- Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act).
- Children and Young Persons (Care and Protection) Act 1998

The Infants' Home is required to collect personal information only by lawful and fair means. Where possible we will collect personal information we require directly from you. Personal information we hold may include:

- Your name
- Date of birth
- Current and previous addresses
- Contact numbers
- e-mail addresses
- Your employer and employment details if provided directly by you and as relevant our purposes
- Any relevant payment or billing information (including bank account details, credit card details, billing address and invoice details)
- And information we require to perform our services to you.

Further information may be collected with your consent in specific instances as notified to you.

Additional information The Infants' Home collects and maintains about children may include: name, former name, date of birth, gender and residential address. As well as Centrelink Customer Reference Number, immunisation status, Medicare number, custody arrangements or parenting orders, dietary requirements, languages spoken, medical conditions or additional needs, photographs and videos, samples of children's work and general information about your child and family that assists us in providing individualised programs for children.

Where it is applicable and necessary The Infants' Home may obtain personal information from third parties such as health professionals and social and community workers.

For employment candidates we will collect and hold personal information relevant to your application for employment. This may include your name and contact details, resume, employment history, academic records, working with children and police checks. Your information will remain private and confidential and if you do not commence employment with The Infants' Home, we will securely destroy records which are no longer required in relation to your application. We reserve the right however to retain for our records any file notes or observations we make in interviews with you or your referees with respect to your qualifications and suitability for a role.

## **Use and Disclosure of Personal Information**

The Infants' Home will only disclose your personal information for the purpose it was collected or a reasonably expected or related secondary purpose. The Infants' Home will not otherwise disclose personal information to a third party for any other purpose without your consent unless it is authorised or required by law.

Your personal information may be used by us to:

- Provide or promote services to you
- collect payments and to administer your account
- provide you with updated or new information about our services
- maintain and update our infrastructure and systems

In providing our services, or collecting and using your personal information, your personal information may be disclosed to third party organisations including:

- Third party service providers, who assist us in operating our business (including credit reporting bodies, collection agencies, legal advisors and technology service providers). We will take reasonable steps to ensure these service providers act in accordance with the relevant Australian Privacy Principles.
- Child protection agencies or family support agencies when we reasonably believe that a child is at risk of significant harm, as required by law.

Where The Infants' Home collects your personal information, we will take reasonable steps to notify you of:

- the purposes for which we are collecting the information
- the third parties to whom we may disclose the information of that kind
- how to access and correct personal information and make privacy complaints

#### Web Analytics

We track Cookies through The Infants' Home website. Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies. Rejecting cookies can, however, may limit the functionality of our website. The Infants' Homer has enabled the Google Analytics Demographics and Interest Reporting functionality available through Google Analytics.

#### **Third Party Providers**

In our centre based services, The Infants' Home uses the third party app Xplor, a private and secure digital platform to help communicate with parents. Xplor has developed a Privacy Policy that covers how they collect, use, disclose, transfer, and store information (<u>https://www.ourxplor.com/privacy-policy</u>). In our family day care services, The Infants' Home uses the third party software Harmony. Please see Harmony's Privacy Policy for details on how they collect, use, disclose, transfer, and store information (<u>https://harmonykids.com.au/wp-content/uploads/Redbourne-Privacy-Policy.pdf</u>).

## **Security of Personal Information**

We take reasonable steps to protect your personal information we hold from misuse, loss, unauthorised access, modification or disclosure. We will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed. The Infants' Home is not responsible for the privacy or security of third-party websites that you access via links on The Infants' Home website or social media accounts.

## **Unsolicited Personal Information**

Unsolicited personal information is personal information we receive that we have taken no active steps to collect. If the information we receive is not required for The Infants' Home to perform one or more of our services or activities, The Infants' Home will destroy or de-identify the information as soon as practicable.

## **Quality of Personal Information**

The Infants' Home takes reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. We recommend that you:

- let us know if there are any errors in your personal information
- keep us up-to-date with changes to your information

## Access and Correction of your Personal Information

You can access your personal information that we hold, with some exceptions as allowed by law. To obtain a copy of your personal information please email mail@theinfantshome.org.au information and we will assess your request and provide you with a response, usually within ten working days. If we refuse your request, or if we refuse to give you access in the manner you requested, The Infants' Home will provide you with written confirmation of the reasons for our refusal and the available complaint process.

## Variation

This policy may be varied from time to time in accordance with any changes to our practices, changes to the way we collect, use and disclose any personal information, and any changes to privacy legislation and requirements. You should check this policy regularly so that you are aware of any variations made to this policy.

## Complaints

If you have a complaint about how The Infants' Home has collected, stored or used your personal information, please contact us. We will endeavour to manage your complaint and take any steps necessary to resolve the matter promptly. If your complaint is unable to be resolved within ten business days, The Infants' Home will advise you in writing including letting you know when we expect to provide our response. If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner. (www.oaic.gov.au)

# **Statutory Legislation and Considerations**

<u>NSW Privacy and Personal Information Protection Act 1998</u> <u>Children and Young Persons (Care and Protection) Act 1998</u> <u>Australian Privacy Principles</u>

## Sources

Office of the Australian Information Commissioner. <u>www.oaic.gov.au</u> Xplor - <u>https://www.ourxplor.com/privacy-policy</u> Harmony - <u>https://harmonykids.com.au/wp-content/uploads/Redbourne-Privacy-Policy.pdf</u>

# **Related Documents**

Date Effective: August 2016

## **Authorisation and Review**

Date to be	Date Reviewed	Authorised By*	Approval Date	Comments
Reviewed				
August 2018	August 2018	E Robinson, CEO	August 2018	Updated with Xplor and Harmony
August 2020				