

Park Orchards Learning Centre Incorporated (POLCI) is committed to providing quality services to the community and this includes protecting privacy.

The Commonwealth Privacy Act, sets out a number of principles concerning the protection of individual's personal information and POLCI has adopted these principles in its Privacy Policy. The aim of these principles is to ensure that organisations handle personal information responsibly and provide a consistent approach to its collection, use and disclosure. These principles also give the individual the right to access their own personal information and correct it if needed.

This document sets out the policy of Park Orchards Learning Centre Incorporated (POLCI) in relation to the collection/handling of personal information.

### Statement of Commitment

POLCI respects the privacy of all individuals and is committed to ensuring that all staff, committee of management members and others involved in the management of the organisation comply at all times with their obligations under Information Privacy Act 2000. This is based on Privacy principles that is briefly summarised as:

Personal information should be used only for the purpose for which it is collected and safeguarded from misuse.

### Information

- POLCI collects *personal information* in relation to its employees, committee of management and volunteers in order to meet workplace occupational health and safety and insurance obligations.
- POLCI currently also collects *personal information* in relation to people participating in POLCI's activities. Eg. Courses and childcare.
- POLCI's contractual obligations to its various funding bodies requires us to collect some information in relation to students and participants. This information includes, but is not limited to:
  - Name, address, phone number/s, sex, date of birth, employment status,
  - Country of birth, language spoken, school level achieved, any tertiary
  - Education taken, reason for doing course, any disability, aboriginal or
  - Torres Strait Islander status and if holder of a concession card.

### Disclosure of Information Collected -

Student enrolment information collected is used by funding organisations, government bodies and the organisation for statistical purposes. These organisations (excluding POLCI) collect this data to gauge the broad range of students accessing funded programs and other services and activities and to plan priorities for funding in the future. Students may at some time receive correspondence from one of these organisations requesting further information which would also be used for the same purpose.

- POLCI is a registered childcare provider and under the Childcare Regulations is obligated to collect certain information regarding:
  - Child's name, address, date of birth, sex, language spoken at home, parents/guardian/s name, address, phone numbers, custody details, doctor's name, address, phone number, child's medical details, emergency contact name, address, phone numbers, relationship to child.

## **POLCI's responsibilities with collection of personal information**

- Collect information only for an identified lawful purpose.
- Ensure that the person involved knows what the purpose for collecting their information is.
- Use and disclose information only for the purpose for which it is collected.
- POLCI will not disclose any information to other parties without formal consent of the person involved unless required to do so by law.
- POLCI will only use the most recent information given by its participant/s.
- Safeguards and disposal policies are in place to reduce the risks of unauthorised access, use, modifications and disclosure are in place.
- Personal information will be removed from our system when it is no longer required or relevant (except where computerised archiving is required)
- Hard copy records relating to POLCI participants will be stored in locked facilities and shredded after the required storage time.
- A complaint procedure if the individual believes that the organisation is not handling their personal information in accordance with the relevant privacy principles.

## **Complaint procedure about privacy breach.**

1. Contact the Manager on 9876 4381 or
2. Put your complaint in writing and address it to the Manager.
3. If you do not wish to communicate with the Manager address the complaint to the Chairperson, Committee of Management.

*P.O. Box 68  
PARK ORCHARDS 3114*

## **If you are not completely satisfied with POLCI's response -**

Refer your complaint to -

*The Privacy Commissioner  
Privacy Victoria  
GPO Box 5057  
Melbourne 3001*

OR Email to -

*Enquiries@privacy.vic.gov.au*

## **Summary**

Park Orchards Learning Centre Incorporated respects their participant's rights to information privacy. Information, which is collected and held on participants, is kept in accordance with information privacy laws. Please contact us if you would like any further information on privacy.

## **Attachment**

Summary of the Information Privacy Principles.

## SUMMARY OF INFORMATION PRIVACY PRINCIPLES

1. **Collection** - An organisation (including a person) must not collect personal information about an individual unless the information is necessary for one of more of its functions or activities. At or near the time of collection, the organisation must notify the individual of a range of prescribed matters including the purpose, proposed use and disclosure, right to access, etc.
2. **Use & Disclosure** - An organisation must not use or disclose personal information about an individual for a purpose (or secondary purpose) other than the primary purpose of collection unless prescribed exception applies.
3. **Data Quality** - An organisation must take reasonable steps to make sure that the personal information it collects uses or discloses is accurate, complete and up-to-date.
4. **Data Security** - An organisation must take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure.
5. **Openness** - An organisation must set out in a document clearly expressed policies on its management of personal information. The organisation must make the document available to anyone who asks for it. On request by a person, an organisation must take reasonable steps to let the person know, generally, what sort of personal information it holds, for what purposes, and how it collects, holds, uses and discloses that information.
6. **Access & Correction** - If an organisation holds personal information about an individual, it must provide the individual with access to the information on request by the individual, except to the extent that prescribed exceptions apply. If an organisation holds personal information about an individual and the individual is able to establish that the information is not accurate, complete and up-to-date, the organisation must take reasonable steps to correct the information so that it is accurate, complete and up-to-date.
7. **Unique Identifiers** - An organisation must not assign unique identifiers to individuals unless the assignment of unique identifiers is necessary to enable the organisation to carry out its functions efficiently. An organisation must not adopt as its own unique identifier of an individual a unique identifier of the individual that has been assigned by another organisation unless prescribed exceptions apply.
8. **Anonymity** - Wherever it is lawful and practicable, individuals must have the option of not identifying themselves when entering transactions with an organisation.
9. **Transporter Data Flows** - An organisation may transfer personal information about an individual to someone (other than the organisation or the individual) who is outside Victoria only if prescribed conditions apply.
10. **Sensitive Information** - An organisation must not collect sensitive information about an individual unless prescribed exceptions apply.

## PERSONAL INFORMATION DISPOSAL POLICY

Park Orchards Learning Centre Incorporated (POLCI) is obligated to collect personal information for enrolment records, childcare regulations and employment reasons.

Course enrolments and childcare information is initially in hard copy form and then entered in computerised systems. At the end of each year all computerised records are archived within the systems. Back up disks are taken and locked in a safe secure place within the building. Both these computerised systems can only be accessed by the administration staff via a password.

### Disposal of Student Enrolment Information

At the completion of each calendar year and following the finalisation of statistical collection all enrolment records for that year will be archived within the computerised enrolment system.. This computerised program cannot be accessed without the appropriate password which is known only by the administration staff. All hard copy records relating to participants personal information are kept for a period of no more than two years in a room, which is locked at all times when staff are not present. Following the storage time all records will be shredded and disposed of.

### Disposal of Childcare Information

At the completion of each calendar year and following the finalisation of statistical collection all enrolment records for that year will be archived within the computerised childcare system.. This computerised program cannot be accessed without the appropriate password which is known only by the administration staff. All hard copy records relating to participants personal information are kept for the required period of time under the childcare regulations, in a secure place at all times when staff are not present. Following the storage time all records will be shredded and disposed of.

### Disposal of Staff Information and Records

All staff information, records and work related information is kept under lock and key at all times. On retirement, resignation or completion of employment staff records will be kept for a period of five years and then shredded and disposed of.

### Document History

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Written/Amended By:	Judy Haley – Manager	Version 2.0
Authorised By:	Committee of Management	Date:
Changes to previous issue	Version 1 May 2005	