

PRIVACY

POLICY AREA	ADMINISTRATION		
POLICY NUMBER	2.5	VERSION	1
ENDORSED DATE	17 th October 2014	NEXT REVIEW DATE	17 th October 2016 (Unless required earlier)

POLICY STATEMENT

Child Inclusive Learning and Development Australia Inc and Children's Integrated Management Services Limited (together referred to herein as Child Australia) believes privacy is an important right of individuals. Child Australia takes steps to protect your personal information from misuse and to use your information only in the ways described in this privacy policy and in accordance with the *Privacy Act 1988 (Cth)* (Privacy Act).

This privacy policy does not apply to personal information collected, or otherwise obtained, by Child Australia in relation to current and former employees and which relates directly to the employment relationship that exists, or existed, between Child Australia and its current and former employees.

Terms used in this privacy policy have the same meaning as those in the Privacy Act.

We make our privacy policy available on our website located at 'www.childaustralia.org.au' and we can also provide a hard copy version upon request. If you would like more information or a hard copy of this privacy policy, please contact us by:

E-mail: Admin@childaustralia.org.au; or
 Post: Human Resources, Child Australia, PO Box 2562, Malaga, WA 6944.

RESPONSIBILITY

- Board
- Chief Executive Officer
- Senior Leader Team
- Managers
- Employees

PROCEDURES

Personal information

Personal information means information or an opinion about an individual whose identity is

apparent or can reasonably be ascertained from the information or opinion. The personal information which we collect, store, use and disclose includes:

- your name;
- your contact details (including emergency contact details);
- employment history;
- your banking details (including your tax file number);
- educational qualifications; and
- certain other details such as your date of birth, gender and occupation.

Sensitive information

Some personal information is considered 'sensitive information' for the purposes of the Privacy Act. The sensitive information which we collect, store, use and may disclose includes:

- information or an opinion about an individual's membership of a professional or trade association;
- and information about an individual contained in National Police Clearance forms or Working with Children checks.

Anonymity and pseudonymity

In most circumstances, it is impractical for people to communicate with us anonymously. We need to identify you to assist you effectively. However, in circumstances where it is lawful and practicable to do so, we will provide you with the option of not identifying yourself, or using a pseudonym, when entering into communications with us.

Collection of solicited personal information

We only collect personal information by lawful and fair means where reasonably necessary for one or more of Child Australia's objects, as set out in clause 4 of Child Australia's Constitution, which are intended to promote, support and enhance the inclusion of children with additional needs in appropriate generic services and associated additional community activities.

We collect personal information which:

- you provide in the course of applying for employment positions at Child Australia;
- is provided to us by third parties who have disclosed that information to us with your consent (and only if it would be unreasonable or impracticable to collect the information directly from you);
- you provide to us in the course of updating or changing your details;
- is contained in documents or correspondence you provide to us (including but not limited to consent forms and confidentiality and conflict of interest declarations); or
- you provide to us in person, by phone, by post, via our website or via other forms of electronic communication (including via social media).

Subject to certain exceptions under the Privacy Act, we only collect sensitive information about you if you consent to the collection of the information and the information is reasonably necessary for one or more of Child Australia's functions or activities. The provision of sensitive information to Child Australia on a voluntary basis (including, for example, information you

supply when applying for a position with Child Australia) will be taken to be consent for this purpose.

In all cases, we will take reasonable steps in the circumstances to tell you why we are collecting your personal information and how it will be used at the time of collection.

We also utilise 'cookies' which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our website. A cookie does not identify you personally but it does identify your computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. If you reject a cookie, some of the parts or features of the website may not function properly.

Collection of unsolicited personal information

From time to time, we may receive unsolicited personal information about you. Unsolicited personal information is information we may receive from you which is not in response to a request by us for that information.

Where we receive unsolicited personal information about you (either directly from you or from a third party), we will consider, within a reasonable period, whether we could have collected that personal information from you had the personal information been solicited.

Where we determine that we could have collected the unsolicited personal information had it been solicited, we will store, use and disclose that personal information in the manner set out in this privacy policy.

Where we determine that we could not have collected the unsolicited personal information had it been solicited, we will destroy or de-identify that unsolicited personal information as soon as practicable, provided it is lawful and reasonable to do so

Use or disclosure of personal information

We may collect, store (in hard copy or electronic form), use or disclose your personal information for the primary purpose of conducting and supporting Child Australia's objects, as set out in clause 4 of Child Australia's Constitution, which are intended to promote, support and enhance the inclusion of children with additional needs in appropriate generic services and associated additional community activities. We may also collect, store, use or disclose your personal information:

- in relation to your application for employment;
- to contact you should we need to;
- to address any enquiries, complaints or feedback from you; or
- to do anything Child Australia is required or authorised by law to do.

Further, we may disclose your personal information to:

- third parties where you have given your consent (express or implied);
- government agencies or other similar entities as required or permitted by law; and

- our professional advisors, contractors or other service providers whom Child Australia may engage from time to time to carry out, advise or assist with the carrying out of Child Australia's objects.

Child Australia will not use your personal information for a secondary purpose unless:

- you consent to the use or disclosure or you would reasonably expect us to use it for a secondary purpose which is related to the primary purpose;
- the use or disclosure is required or authorised by law; or
- the use or disclosure is otherwise permitted by the Privacy Act (for example, as a necessary part of an investigation of suspected unlawful activity).

Cross-border disclosure of personal information

Child Australia does not send your personal information to third parties located overseas.

Adoption, use or disclosure of government related identifiers

Where we collect your personal information, it will usually be identified by a common identifier, such as your name, address or contact details.

Subject to certain exceptions under the Privacy Act, Child Australia will not disclose identifiers assigned by Government agencies or its agents, such as tax file numbers, or use those identifiers to identify your personal information.

Security of personal information

We take reasonable steps to protect your data from misuse, interference and loss, and from unauthorised access, modification or disclosure. This includes appropriate physical and technological barriers and security measures to protect your personal information in both hard copy and electronic form.

Child Australia also takes reasonable steps to destroy or permanently de-identify personal information which is no longer needed for the purposes described in this privacy policy.

Access to personal information

Subject to any exceptions in the Privacy Act, if you have provided us with personal information, you have a right to request access to it. If you are of the belief that Child Australia holds personal information relating to you and you wish to obtain access to this information, please contact us on the details provided above. We may ask you to provide proof of your identity if you request access to or correction of your personal information.

In the event that a request for access is made, we will acknowledge receipt of the request within two working days. Following this, we will review our records to determine what personal information relating to you we hold and endeavour to respond to your request within a reasonable period after the request is made, but in any event, within 21 days.

Once we have notified you of the nature of the personal information relating to you which we hold, we will give you access to your personal information in the manner requested by you, if it is reasonable and practicable to do so.

We do not levy a charge in respect of the making of a request for access to personal information held by us. However, we may charge you for the reasonable costs incurred by us in providing you with access to the personal information held by us.

The Privacy Act provides instances where a holder of personal information may refuse to provide an individual with access to their personal information. If we refuse to give you access to your personal information, we will give you a written notice that sets out our reasons for the refusal and the mechanisms available to complain about our refusal.

Correction of personal information

Child Australia takes reasonable steps to keep your personal information as accurate, complete and up-to-date as possible. We make an effort to ensure this data is of high quality, but this relies on the accuracy and frequency of data provided by you.

You can assist us by notifying us if your circumstances change, such as if your name changes.

If we hold personal information about you and you request that we correct the information, we will take reasonable steps to rectify the situation free of charge if we are satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. If we refuse to correct your personal information, we will give you a written notice setting out our reasons for the refusal and the mechanisms available to complain about the refusal.

Complaints, questions or further information

If you wish to make a complaint about a breach of your privacy by Child Australia, you may contact us using the contact details provided above. All complaints will be investigated by an appropriately qualified representative of Child Australia in accordance with our complaint handling process (which is available on our website or in hard copy on request). We will endeavour to resolve your complaint as quickly as possible and, in any event, within 30 days. We will notify you of the outcome of the investigation, including how we propose to resolve your complaint and what, if any, corrective measures we will implement.

If you are not satisfied with our handling of your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**). For more information about doing so, visit <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

Changes to privacy policy

Child Australia reserves the right to amend this privacy policy from time to time. If we do so, the amended privacy policy will be posted as soon as practicable following that amendment on our webpage (www.childaustralia.org.au).

RELATED DOCUMENTS/FORMS

- See www.childaustralia.org.au

REFERENCE LIST

- Privacy Act 1988 (Cth) (Privacy Act)
- Office of the Australian Information Commissioner (OAIC).