

**POLICY: 7.08****Privacy****1. Objective**

Queensland Lutheran Early Childhood Services is committed to providing quality services to you and this policy outlines our ongoing obligations in respect of how we manage your Personal Information.

**2. Explanation**

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au).

**3. What is Personal Information and why do we collect it?**

Personal Information is information or an opinion that identifies an individual. The specific purpose for which we collect personal information will largely depend on the type of relationship an individual has with us, for example, whether the individual is the parent or child of a Service, a potential job candidate or a contractor. The kinds of personal information we may collect includes:

- Information about you, such as your:
  - name
  - address
  - gender
  - date of birth
  - contact details
- Information about your circumstances, such as your:
  - employment status and history
  - education status
  - financial situation
  - cultural and linguistic background
  - citizenship and visa status;
  - family circumstances
- Information about your child enrolled in the Service or other relevant family members for the purpose of administering your child's enrolment:
- Information about your interactions with us, such as:
  - payments for services we provide you
  - feedback and complaints
  - any other special service arrangements names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews (either employment or service related interviews), child enrolment documentation, correspondence with you

about our services, by telephone and facsimile, by email, via our website [www.qlecs.org.au](http://www.qlecs.org.au), from your website (if any), from media and publications, from other publicly available sources from cookies and from third parties. We don't guarantee website links or policy of authorised third parties.

#### **4. Implementation**

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

##### **4.1. Sensitive Information**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only when it is necessary for to administer your child's enrolment and:

- For the primary purpose for which it was obtained;
- For a secondary purpose that is directly related to the primary purpose; and
- With your consent; or where required or authorised by law.

##### **4.2. Third Parties**

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps, to ensure that you are made aware of the information provided to us by the third parties where appropriate.

##### **4.3. Disclosure of Personal Information**

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure;
- To our employees and officers;
- To credit reporting and debt collection agencies;
- To early childhood government agency and other regulators;
- Where required or authorised by law.

##### **4.4. Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

##### **4.5. Access to your Personal Information**

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Queensland Lutheran Early Childhood Services will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

#### **4.6. Maintaining the Quality of your Personal Information**

It is important to us that your Personal Information is up-to-date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

### **5. Privacy Policy Complaints and Enquiries**

If you have any queries or complaints about our Privacy Policy, please contact us at:

Lutheran Church of Australia Queensland District trading as Queensland Lutheran  
Early Childhood Services

PO Box 1857

Milton, QLD 4064

Tel: 07 3511 4077

Email: [admin@qlecs.org.au](mailto:admin@qlecs.org.au)

Any complaints are required to be made in writing, and we will deal directly with you to investigate your complaint and respond to you within a reasonable time.

If you are not satisfied with the outcome, then you may make a complaint to the Office of the Australian Information Commissioner (OAIC). For information about how to make such a complaint, please refer to the OAIC website.

### **6. Evaluation**

This Policy will be reviewed and updated (if needed), at least every two years, by the QLECS Operations Team, following input from all stakeholders. As a result of the review this Policy may change from time to time and is available on our website.

### **7. Associated Documents**

N/A

### **8. Related Policies**

7.01 Confidentiality and Record Keeping

## **References**

### **Legislation**

The Australian Privacy Principles (APPs) contained in the Privacy Act 1988