PRIVACY AND CONFIDENTIALITY POLICY

Contents

1 NQS ....................................................................................................................................................................... 2
2 National Regulations ............................................................................................................................................ 2
3 Aim ........................................................................................................................................................................ 2
4 Related Policies ..................................................................................................................................................... 2
5 Who is affected by this Policy? ............................................................................................................................. 2
6 Introduction .......................................................................................................................................................... 3
7 Implementation .................................................................................................................................................... 3
8 Service Privacy Guidelines .................................................................................................................................... 4
9 Accountability ....................................................................................................................................................... 6
10 Consent and our Approach ................................................................................................................................... 6
11 Young Children ..................................................................................................................................................... 6
12 What personal information do we normally collect about Children? ............................................................. 7
13 What personal information do we normally collect about Family Members and Responsible Others? ....... 7
14 What personal information do we normally collect about Staff and Educators? ............................................ 8
15 What personal information do we normally collect about other business contacts – Suppliers etc? ............. 8
16 The Purpose of Collection – Children ................................................................................................................... 8
17 Information on Display ......................................................................................................................................... 9
18 The Purpose of Collection – Family Members and Responsible Others ............................................................... 9
19 The Purpose of Collection – Suppliers and other Business Contacts ............................................................... 9
20 Use of External Contractors .................................................................................................................................. 9
21 Accuracy of your Personal Information .............................................................................................................. 10
22 Security of your Personal Information ............................................................................................................... 10
23 Your Access and Correction Rights ................................................................................................................... 10
24 Use of Government Identifiers ........................................................................................................................... 11
25 Anonymity .......................................................................................................................................................... 11
26 Contacting UOW Pulse Ltd Children’s Services and Complaints .................................................................... 11
27 Sources ............................................................................................................................................................... 12
28 Review ................................................................................................................................................................ 12
29 Version Control Table .......................................................................................................................................... 13
1 NQS

<table>
<thead>
<tr>
<th>QA4</th>
<th>4.2.1</th>
<th>Professional standards guide practice, interactions and relationships.</th>
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<tr>
<td></td>
<td>4.2.3</td>
<td>Interactions convey mutual respect, equity and recognition of each other’s strengths and skills</td>
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<td>QA5</td>
<td>5.2.3</td>
<td>The dignity and the rights of every child are maintained at all times</td>
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<td>QA6</td>
<td>6.1</td>
<td>Respectful supportive relationships are developed and maintained</td>
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<td>QA7</td>
<td>7.1.1</td>
<td>Appropriate governance arrangements are in place to manage the service</td>
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2 National Regulations

<table>
<thead>
<tr>
<th>Regs</th>
<th>181</th>
<th>Confidentiality of records kept by approved provider</th>
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<tr>
<td></td>
<td>181-184</td>
<td>Confidentiality and storage of records</td>
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3 Aim

3.1 This policy is addresses the issues of privacy and confidentiality of children, educators, volunteer workers and parents using the service. It aims to protect the privacy and confidentiality by ensuring that all records and information about individual children, families, educators and management are kept in a secure place.

3.2 This Policy ensures that all records and information are only accessed by or disclosed to those people who need the information to fulfil their responsibilities at the service or have a legal right to know.

3.3 The Kids’ Uni Policies and Procedures apply to Kids’ Uni North, Kids’ Uni South, South Coast Workers Child Care Centre, Kids Uni After School Care and Vacation Care (also known as Kids’ Uni OOSH).

4 Related Policies

- Educator and Management Policy (CHI-ADM-POL-017)
- Enrolment Policy (CHI-ADM-POL-022)
- Family Law and Access Policy (CHI-ADM-POL-025)
- Medical Conditions Policy (CHI-ADM-POL-038)
- Record Keeping and Retention Policy (CHI-ADM-POL-049)
- Social Networking Usage Policy (CHI-ADM-POL-053)

5 Who is affected by this Policy?

- Child
- Families
- Educators
- Management
6 Introduction

6.1 UOW Pulse Ltd Children's Services understand that privacy is an important issue for individuals. UOW Pulse Ltd Children's Services is a non-profit and, in part, government funded, corporation committed to the provision of a wide range of quality early childhood services.

6.2 To do this effectively we need, by law, to collect a great deal of personal information about children and their families, guardians and others. Much of this information will be "sensitive confidential information".

6.3 This is defined in the Privacy Act to be information concerning an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of professional or trade associations, membership of a trade union, sexual preferences or practices or "health information".

6.4 We sometimes need to disclose this information to do our job. Sometimes this will be because the law requires such disclosure and sometimes it will be because the welfare of the child demands it.

6.5 UOW Pulse Ltd Children's Services is regulated by legislation and government imposed rules of practice, much of which has a bearing on what personal information we collect and what we do with it. Wherever possible, we will seek to protect privacy within the parameters of those laws and requirements.

6.6 This policy statement outlines the policy of UOW Pulse Ltd Children's Services on the privacy of personal information and our compliance with the National Privacy Principles ("NPPs") contained in the Privacy Act.

6.7 Because of the vast diversity of services we offer and the range of circumstances which may arise, it is neither possible or sensible for us to prescriptively map out our exact responses to privacy issues. Much will depend on the precise circumstances which exist and the nature of the information concerned.

7 Implementation

National Privacy Principles

NPP 1: collection
Describes what an organisation should do when collecting personal information, including what they can collect, collecting from third parties and, generally, what they should tell individuals about the collection.

NPP 2: use and disclosure
Outlines how organisations may use and disclose individuals' personal information. If certain conditions are met, an organisation does not always need an individual's consent to use and disclose personal information. There are rules about direct marketing.

NPPs 3 & 4: information quality and security
An organisation must take steps to ensure the personal information it holds is accurate and up-to-date, and is kept secure from unauthorised use or access.

NPP 5: openness
An organisation must have a policy on how it manages personal information, and make it available to anyone who asks for it.

**NPP 6: access and correction**

Gives individuals a general right of access to their personal information, and the right to have that information corrected if it is inaccurate, incomplete or out-of-date.

**NPP 7: identifiers**

Generally prevents an organisation from adopting an Australian Government identifier for an individual (e.g. Medicare numbers) as its own.

**NPP 8: anonymity**

Where possible, organisations must give individuals the opportunity to do business with them without the individual having to identify themselves.

**NPP 9: trans-border data flows**

Outlines how organisations should protect personal information that they transfer outside Australia.

**NPP 10: sensitive information**

Sensitive information includes information such as health, racial or ethnic background, or criminal record. Higher standards apply to the handling of sensitive information.

### 8 Service Privacy Guidelines

8.1 Personal information will only be collected in so far as it relates to the service’s activities and functions, and in line with relevant legislation. (National Privacy Principle 1.1 - Privacy Act 1998.)

8.2 Collection of personal information will be lawful, fair, reasonable and unobtrusive. (National Privacy Principle 1.2 - Privacy Act 1998.)

8.3 Individuals who provide personal information will be advised of: the name and contact details of the service; the fact that they are able to gain access to their information; why the information is collected; the organisations to which the information may be disclosed; any law that requires the particular information to be collected; and the main consequences for not providing the required information. (National Privacy Principle 1.3 – Privacy Act 1998).

8.4 The use or disclosure of personal information will only be for its original collected purpose, unless the individual consents or unless it is needed to prevent a health threat, or is required or authorised under law. (National Privacy Principle 2.1 – Privacy Act 1998).

8.5 The service will take steps to ensure the personal information collected, used or disclosed, is accurate, complete and up to date. Parents will be required to update their enrolment details annually, or whenever they experience a change in circumstances. Computer records will be updated as soon as new information is provided. (National Privacy Principle 3 – Privacy Act 1998).

8.6 Personal information will be kept in a secure and confidential way, and destroyed by shredding or incineration, when no longer needed. (National Privacy Principle 4 – Privacy Act 1998).

8.7 Individuals will be provided with access to their personal information and may request that their information be updated or changed where it is not current or correct. (National Privacy Principle 6 – Privacy Act 1998).

8.8 Individuals wishing to access their personal information must make written application to the Privacy Officer who will arrange an appropriate time for this to occur. The Privacy Officer will protect the security of the information by checking the identity of the applicant, and ensuring
someone is with them while they access the information to ensure the information is not changed or removed without the Privacy Officer /Nominated Supervisor’s knowledge.

8.9 Every employee and the Operator is provided with clear written guidelines detailing:
   i. What information is to be kept confidential and why
   ii. What confidential information they may have access to in order to fulfil their responsibilities and how this information may be accessed.
   iii. Who has a legal right to know what information?
   iv. Where and how the confidential information should be stored.

8.10 Every employee and the Operator is required to sign a Confidentiality Statement.

8.11 Every enrolling parent/guardian is provided with clear information about:
   i. What personal information is kept, and why.
   ii. Any legal authority to collect personal information.
   iii. Third parties to whom the service discloses such information as a usual practice.

8.12 Confidential conversations that educators have with parents, or the Privacy Officer has with educators will be conducted in a quiet area away from other children, parents and educators. Such conversations are to be minuted and stored in a secure folder.

8.13 Personnel forms and employee information will be stored securely. (Workplace Relations Act 1996).

8.14 Applicants, students or volunteers will be informed that their personal information is being kept, for what reason, for how long, and how it will be destroyed at the end of the time period.

8.15 Applicants will be asked for their consent before their references are checked. Unsuccessful applicants will be advised of when and how their personal information will be destroyed.

8.16 Information about educators will only be accessed by the Privacy Officer, Nominated Supervisor/Operator and individual educators concerned. (Workplace Relations Act 1996.)

8.17 All matters discussed at committee meetings will be treated as confidential. (Privacy Act 1998.)

8.18 No educators may give information or evidence on matters relating to children and/or their families to anyone other than the responsible parent/guardian, unless prior written approval by the responsible parent/guardian is obtained. Exceptions may apply regarding information about children when subpoenaed to appear before a court of law. Notwithstanding these requirements, confidential information may be exchanged in the normal course of work with other educators at the Service and may be given to the Operator, when this is reasonably needed for the proper operation of the Service and the wellbeing of users and educators. (Privacy Act 1988).

8.19 Reports, notes and observations about children must be accurate and free from biased comments and negative labelling of children.

8.20 Educators will protect the privacy and confidentiality of other educators by not relating personal information about another educator to anyone either within or outside the Service.

8.21 Students/people on work experience/volunteers will not make educators/children or families at the Service, an object for discussion outside of the Service (e.g. college, school, home etc.), nor will they at any time use family names in recorded or tutorial information.
8.22 Students/people on work experience/volunteers will only use information gained from the Service upon receiving written approval from the Service to use and/or divulge such information, and will never use or divulge the names of persons.

9 Accountability

9.1 It is the responsibility of all UOW Pulse Ltd Children's Services staff, educators and contractors to comply with privacy laws and this policy. A copy of this policy will be made available to staff and educators and periodic training in privacy compliance will occur.

9.2 UOW Pulse Ltd Children's Services will, wherever commercially and legally possible and appropriate, require contractors to be contractually bound to comply with this policy. Contractors who display a willingness to do so and a culture of respect for privacy and compliance with privacy laws will be preferred.

9.3 UOW Pulse Ltd Children's Services will regard non-compliance with this policy most seriously. Violation of this policy by staff will lead to disciplinary procedures being imposed, up to and including the possibility of dismissal.

9.4 Staff and educators of UOW Pulse Ltd Children's Services must report breaches of this policy to the Privacy Officer as they become aware of them.

9.5 Breach of this policy will include the following:
   i. Non-compliance with the terms of this document and procedures implemented by the UOW Pulse Ltd Children's Services Privacy Officer;
   ii. Breach of the NPPs or the provisions of the Privacy Act;
   iii. Gaining or attempting to gain unauthorised access to personal information held by UOW Pulse Ltd Children's Services;
   iv. Unauthorised disclosure or use of personal information held by UOW Pulse Ltd Children's Services.

10 Consent and our Approach

10.1 In some cases the Privacy Act provides that UOW Pulse Ltd Children's Services may not collect or make certain use of personal information or disclose it without the consent of the individual. On the other hand, in other cases UOW Pulse Ltd Children's Services is in fact subject to other laws that require or authorise it to collect, use or disclose personal information.

10.2 We will not put undue pressure on an individual to give consent. We will endeavour to ensure that individuals can make an informed decision and that they are not under duress.

10.3 Legislation binding on UOW Pulse Ltd Children's Services provides that UOW Pulse Ltd Children's Services may not enrol a child without obtaining parental consent to certain things, such as seeking urgent medical attention. Where that requirement is present, we will inform parents of our statutory requirement and reasons for insisting on consent. Our enrolment forms and parent agreements set this out.

11 Young Children

11.1 We recognise that the young people entrusted to our care are "individuals" whose information is subject to the provision of the Privacy Act. However, in all but exceptional cases, it is our
policy that the children in our care lack the maturity and understanding of privacy issues to act on their own in relation to such matters.

11.2 Where consent is required concerning privacy matters, it is our policy not to seek it from children of such young age. Instead we will, where consent is required, seek such consent from the parent or guardian on behalf of the child. In other dealings with young children, we believe that the requirements of the Privacy Act can only be dealt with by communication with the parents or guardian of the child.

12 What personal information do we normally collect about Children?

12.1 To do our job, UOW Pulse Ltd Children's Services needs and is required to collect a substantial amount of information about the children in its care. Legislation such as the regulations made under the Children (Care and Protection Act), (NSW) requires a wide range of information to be recorded. Much of the information that we are required to record is in the category of "sensitive" information.

12.2 Also, our licence agreement and the guidelines issued by Department of Education and Communities require us to demonstrate that we collect and use personal information to enable us to provide a service that responsibly and sensitively deals with such things as:

i. Developmental records of the child;

ii. Health problems of the child and particulars of required treatments and medications;

iii. Wider community health issues and especially the need to limit the spread of communicable diseases;

iv. Emergency treatment for accidents and health episodes;

v. The ethnic and cultural identity of the child (in this context we will incidentally collect information about the child’s family and responsible others - see below);

vi. The religious identity of the child and observance of religious practices (this will also require that we collect incidental information about the child's family and others - see below); and

vii. Court orders affecting custody of the child.

12.3 In some instances we will be obliged to collect and report to proper authorities information about the child and its family or others where we have grounds for suspecting that the child is at risk of significant harm.

13 What personal information do we normally collect about Family Members and Responsible Others?

13.1 UOW Pulse Ltd Children's Services will collect information about family members and others with an important connection or responsibility of care for the child ("responsible others") entrusted to it.

13.2 The same legislation and practice requirements that require us to collect information about health matters, ethnic identity and religious affiliation will by definition require us to collect information about family members and responsible others.

13.3 If a UOW Pulse Ltd Children’s Services staff and educators has grounds for believing that the child is at risk of significant harm, it may be necessary for collection of information, including
sensitive information, not only about the child, but about the family members or responsible others, even neighbours. These rules may also require us to disclose such information to third parties.

13.4 Further, UOW Pulse Ltd Children's Services will need information about any responsible others for dealing with emergencies and the task of conveying the child to or collecting the child from the service. We will also need to know the identity of the child's medical practitioner for similar reasons.

13.5 Unless otherwise required by law UOW Pulse Ltd Children’s Services will comply with the requirements of the *Privacy Act* in relation to information collected from such responsible others. Where we collect the information from the parent or guardian and not directly from the responsible other, we will take reasonable steps to ensure that the responsible other is notified of our collection of the information.

14 What personal information do we normally collect about Staff and Educators?

14.1 UOW Pulse Ltd Children’s Services will gather such information as personal contact details; emergency contact details; payroll information; tax file number; qualifications; medical certificates; learning and development plans; work performance matters if required; Working with Children Check results.

14.2 Such information is designed to meet government legislation (both federal and state) as well as assist in the overall operation of the business. Such information is treated with great sensitivity and properly secured at all times.

15 What personal information do we normally collect about other business contacts – Suppliers etc?

15.1 In the case of UOW Pulse Ltd Children's Services business contacts and suppliers, we will not normally collect personal information other than an individual’s name, job-title, address, phone numbers, facsimile numbers and email addresses - for the purpose of enabling UOW Pulse Ltd Children's Services to fulfil its obligations to those contacts and suppliers.

16 The Purpose of Collection – Children

16.1 Personal information we collect about children will be used for the purposes of providing the wide variety of child care services to the child and its family. Those broadly include preschools, long day care, out-of-school care and occasional care services.

16.2 If we wish to use information collected about children or families for the purposes of studying demographics or other social issues relevant to the provision of child care services generally, we will ensure that the information is de-identified in the study, ie there will be no way for a reader of the relevant study or report to determine the identity of the children whose information was used.

16.3 We would get the consent of parents before disclosing sensitive personal information about the child to a third party. However, we may be required by law to disclose personal information of the child in a range of circumstances. For example, we may be required to disclose personal information of the child:

i. To the guardian or other person responsible for the child;
ii. To other family members or contacts in an emergency or where the child is ill or injured or is at risk of illness or injury;

iii. To the child's medical practitioner;

iv. To other health or medical practitioners where the child is sick or injured or at risk of illness or injury;

16.4 This is not an exhaustive list. There may be many other circumstances where UOW Pulse Ltd Children's Services will be required to disclose personal information held about the child to a person other than the parent or guardian.

17 Information on Display

17.1 Persons who enter UOW Pulse Ltd Children's Services premises (among them parents, responsible others, medical practitioners, government representatives, service providers and suppliers of goods) may be able to view information about the children in our care. For example, some personal information of the child and family members may be on display, such as photos, artwork and other materials that may divulge names, ages, ethnic and religious background or affiliation and health matters.

17.2 In relation to the latter, in some cases it may be necessary to have on display health information so that we can have ready access to it for emergency purposes. Information on display may identify not just the relevant child but parents and responsible others.

18 The Purpose of Collection – Family Members and Responsible Others

18.1 Personal information collected about parents, guardians and responsible others will not be collected for its own sake but to assist UOW Pulse Ltd Children's Services in the provision of child care services to the child and their family.

18.2 We may use the information collected from parents and guardians to keep them informed of services that UOW Pulse Ltd Children's Services offers from time to time and sometimes to make contact to request assistance with UOW Pulse Ltd Children's Services. In such cases we will always allow the individual to opt out of further receipt of such information.

19 The Purpose of Collection – Suppliers and other Business Contacts

19.1 As noted above we will generally collect only contact information so that we can fulfil our commitments and contractual responsibilities to them and manage and monitor our dealings with them.

19.2 Wherever we use personal information for a purpose other than the primary purpose for which it was collected, we will only use or disclose the information if the primary and secondary purposes are related.

19.3 The individual would have a reasonable expectation that we would use the information or disclose it for the secondary purpose or if we obtained the consent of the individual to do so.

20 Use of External Contractors

20.1 Like many other organisations, UOW Pulse Ltd Children's Services uses the services of temporary educators. They are McArthur employees from a recruitment firm, not of UOW Pulse Ltd Children's Services.
20.2 To that extent they are external contractors who may have access to the personal information we have collected. They will in each case be advised of our privacy policy and of the requirement that they comply with it.

21 Accuracy of your Personal Information

21.1 It is our policy to ensure that when personal information is collected from an individual it is accurately recorded. This is the responsibility of all staff and educators involved in the collection and recording of such information. We will adopt suitable protocols and such technology as may be available from time to time (within our financial means) to prevent unauthorised access to and tampering with or alteration of the personal information we hold.

21.2 We will encourage our contacts to let us know if they become aware of inaccuracies in the information we retain. We may also conduct sample checks from time to time. We will respond promptly to any request for correction of data and will act quickly to correct data that is discovered to be inaccurate.

22 Security of your Personal Information

22.1 It is not appropriate in this policy to provide specific details of security measures adopted by UOW Pulse Ltd Children's Services to protect information. To do so could compromise those security measures. UOW Pulse Ltd Children's Services will use an appropriate combination of:
   i. Physical measures including physical barriers;
   ii. Alarm systems;
   iii. Access technology; and
   iv. Administrative protocols, to exclude unauthorised persons or intruders from gaining access to information.

22.2 To maintain the integrity of information, UOW Pulse Ltd Children's Services has acquired and will continue to acquire (within its means) up-to-date computer virus prevention technology and makes use of other appropriate technology, such as password security protocols and "fire-walls" to exclude unauthorised access of its computer system.

23 Your Access and Correction Rights

23.1 The Privacy Act requires UOW Pulse Ltd Children's Services to provide individuals access to the personal information which UOW Pulse Ltd Children's Services holds about them - unless UOW Pulse Ltd Children's Services is entitled under the Privacy Act or other legislation to deny access or provide an explanation for a decision instead. This qualified right of access will be advised when personal information is collected.

23.2 In the case of personal information held about children, UOW Pulse Ltd Children's Services will provide access on the request of the parent or guardian. When requesting access to personal information, UOW Pulse Ltd Children's Services requires use of a written request form (OS3 - Request to Access Personal Information), which can be obtained by contacting our Privacy Officer (see below) or through our services.

23.3 UOW Pulse Ltd Children's Services will respond to requests for access as soon as possible and will acknowledge the request within 14 days and deal with it within 30 days or earlier. Though we may ask, we will not require an explanation of why as a pre-requisite to giving access. We
will not charge a fee for access but we may seek recovery of any actual costs to us of providing access.

23.4 Some circumstances where it may be appropriate and lawful for UOW Pulse Ltd Children's Services to deny access are where:
   i. Providing access would unreasonably be to the detriment of the privacy of another individual;
   ii. The request is frivolous or vexatious;
   iii. The information relates to existing or anticipated legal proceedings between UOW Pulse Ltd Children's Services and the individual, and the information would not be available by the legal discovery processes;
   iv. Giving access would reveal UOW Pulse Ltd Children's Services intentions in relation to negotiations with the individual and prejudice those negotiations for UOW Pulse Ltd Children's Services; or
   v. Providing access would be unlawful or if denying access is required or authorised under law.

23.5 This is not an exhaustive list of circumstances where we may be entitled or even required to deny access.

24 Use of Government Identifiers

UOW Pulse Ltd Children's Services may collect them but we will not use government identifiers such as tax file numbers or Medicare numbers as a means of identifying a person from whom the identifier has been collected.

25 Anonymity

25.1 Wherever appropriate we will give individuals the option of remaining anonymous when communicating with UOW Pulse Ltd Children's Services. This will be most relevant to the collection of information via the UOW Pulse Ltd Children's Services website (as to which, please see the privacy statement on its home page) and via survey.

25.2 In those cases if information is collected that identifies the individual, we will de-identify it before storing or using it.

26 Contacting UOW Pulse Ltd Children's Services and Complaints

26.1 If an individual:
   i. Has an enquiry about our information management or privacy procedures;
   ii. Wishes to request access to personal information;
   iii. Wishes to see a copy of this policy or
   iv. Wishes to make a complaint about our handling of personal information that person can contact our Privacy Officer by the following means:

<table>
<thead>
<tr>
<th>Phone:</th>
<th>(02) 4221 8037</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fax:</td>
<td>(02) 4221 8034</td>
</tr>
<tr>
<td>Attention:</td>
<td>Privacy Officer</td>
</tr>
<tr>
<td>Postal Address:</td>
<td>P.O. Box U100 Wollongong NSW 2500</td>
</tr>
</tbody>
</table>
26.2 Complaints will be dealt with in the first instance by the Privacy Officer or in her/his absence, by a person nominated by her/him.

26.3 Complaints must be made by using the form we prescribe (refer to Grievance Procedure). This will allow us to deal with complaints in a professional, sensitive and consistent manner in compliance with the Privacy Act. A copy of the form can be obtained on the Kids Uni Website. Click on feedback or alternatively consulting the Privacy Officer.

26.4 We will acknowledge receipt of a request within 14 days of receiving it and we will respond within 30 days of receipt, assuming that we are able to investigate the necessary facts in that time.

26.5 Grievant will be given an opportunity to put their complaint in writing, to suggest a remedy for the complaint and, if necessary, to discuss the matter with the UOW Pulse Ltd Children's Services Privacy Officer.

26.6 If the grievant is not satisfied that the Privacy Officer has dealt properly and reasonably with the complaint, the complainant may request that the Privacy Officer bring the matter to the attention of the Chief Executive Officer, who may deal with the matter or refer it to the UOW Pulse Ltd Children's Services Board of Directors for a determination.

26.7 The Privacy Officer will keep a register of complaints and their outcomes. This will not be made publicly available since as this breach the privacy of the individuals named.

26.8 The Privacy Officer will determine in the case of each complaint whether the complaint demonstrates a systemic or chronic compliance problem and will make recommendations to the management of UOW Pulse Ltd Children's Services as to how to address/rectify such issues if they are identified.

26.9 The Privacy Officer will deal with privacy complaints promptly and in a consistent manner, following the Service’s Grievance Procedures. Where the aggrieved person is dissatisfied after going through the grievance process, they may appeal in writing to “The Director of Complaints, Office of the Federal Privacy Commission, GPO Box 5218, Sydney NSW 1042, or phone the Commissioner’s Hotline on 1300 363 992. (Privacy Act 1998). www.privacy.gov.au

27 Sources
National Quality Standard
Education and Care Services National Regulation
Privacy Act 1988
Information Privacy Principles as stipulated in the Privacy Act 1988
United Nations Convention of the Rights of a Child
Freedom of Information Act 1989

28 Review
This policy will be reviewed every 3 years and the review will include Management, Employees, Families and Interested Parties.
## Version Control Table

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<td>2</td>
<td>Mar 2013</td>
<td>Mar 2014</td>
<td>Michele Fowler Manager – Kids Uni</td>
<td>Paragraph inserted re application of policies across all centres. Migrated into new QA format. This policy replaces the Privacy Policy Statement.</td>
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<td>Mar 2014</td>
<td>Mar 2017</td>
<td>Michele Fowler Manager – Kids Uni</td>
<td>Policy reviewed with no changes required. The review period changed to 3 years.</td>
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