

Confidentiality and Privacy Policy

Policy overview

The Confidentiality and Privacy Policy for K1 Payroll Pty Ltd sets out K1 Payroll Pty Ltd's expectations regarding preserving the confidentiality and privacy of K1 Payroll Pty Ltd related information and its collection and to ensure that the information is only used for the purpose permitted in the policies and procedures.

This policy is a guide only and will not form part of your General Terms and Conditions of employment or confer contractual rights, on which a staff member may rely. This policy may be amended from time to time.

What do I need to do?

You need to read the policy carefully. You will receive some education on the policy and how it is implemented during your time here at K1 Payroll Pty Ltd.

Policy and further information

To the extent that the contents of the Confidentiality and Privacy Policy refers to obligations on K1 Payroll Pty Ltd, they are guidelines for management or summaries of applicable legislative requirements only and are not contractual terms, conditions or representations on which a staff member may rely.

Your manager is available to assist with any queries you have relating to the policy which is detailed below.

Confidentiality Policy

Purpose and scope

During the period of your employment or engagement with K1 Payroll Pty Ltd or at any time thereafter, you are not to disclose to any unauthorised person, confidential information relating to K1 Payroll Pty Ltd, staff, children, families, clients or suppliers of K1 Payroll Pty Ltd.

Confidential information includes:

- Information about our staff, children, families, suppliers including their identity, personal details, family and financial affairs (as applicable);
- All documentation relating to children and their care and education, including; Developmental

records, health records, work samples, enrolment records, and any other associated documentation completed during their time at K1 Payroll Pty Ltd;

- Any documents marked as confidential that relates to staff members;
- Any document marked as confidential that relates to staff members, including entitlements and payment details;
- Any document or information marked as confidential and any information received or developed by a staff member in the course of the employment or engagement which is not publicly available and relates to curriculum, processes, and techniques used by K1 Payroll Pty Ltd in the course of its business, or related agencies;
- Policies, procedures, forms and related guides;
- Contractual, technical and production information;
- Business and marketing plans;
- Notes and developments regarding confidential information;
- Any of K1 Payroll Pty Ltd's trade secrets, confidential dealings, legal information or operations;
- Any information (electronic, hard copy or otherwise) concerning K1 Payroll Pty Ltd and its related entities; and
- Other information designated as confidential by K1 Payroll Pty Ltd or agencies it engages or partners with for any child, family or staff related reason;
- Turnover figures, information relating to suppliers and clients, any marketing information such as client and supplier lists, financial information and business plans;

All K1 Payroll Pty Ltd documentation is confidential. This includes child and family records, forms (blank or completed), policies and procedures, financial and other statements, and all other documents. These documents can only be taken from K1 Payroll Pty Ltd with the informed permission of the Manager.

Staff agree to return any or all confidential information upon request by K1 Payroll Pty Ltd.

This is not meant to impose an obligation on the employee with respect to maintaining confidence regarding any portion of the confidential information which:

- Is generally known or available by publication, commercial use or otherwise;

- Which you are required by law or by a government agency to disclose; or
- You have disclosed to K1 Payroll Pty Ltd's legal advisers who agreed to keep the confidential information confidential;

Breaches of confidential information are taken very seriously and K1 Payroll Pty Ltd will not tolerate any disregard by an employee for this policy, or for contractual obligations concerning confidential information.

Employee Privacy Policy

Purpose and scope

During the period of your employment or engagement with K1 Payroll Pty Ltd or at any time thereafter, you will be required to collect, store and use personal information of K1 Payroll Pty Ltd, staff, children, families, clients or suppliers of K1 Payroll Pty Ltd in accordance with this Employee Privacy Policy.

Information Collected

K1 Payroll Pty Ltd and its staff must only collect information for the purpose of providing K1 Payroll Pty Ltd services or as required under the laws, regulations and guidelines of the relevant Australian and state government agencies responsible for children, child protection or education and care programs. The relevant laws and regulations include, but are not limited to:

- Privacy Act 1988 (Cth) ("Privacy Act");
- The National Quality Framework;
- Northern Territory of Australia Education and Care Services (National Uniform Legislation) ACT 2011;
- Education and Care Services National Law (WA) Act 2012;
- Office of the Information Commissioner NT; and
- Office of the Information Commissioner WA.

Sensitive Information

The information collected by K1 Payroll Pty Ltd may be sensitive information as defined in the Privacy Act and may include, but is not limited to, health or location information about an individual.

K1 Payroll Pty Ltd and staff are not permitted to disclose sensitive information to anyone unless required to do so by law or at the clear and reasonable direction of the Manager.

How it is collected

Information must be collected in a fair, reasonable and lawful manner through:

- verbal and written communication;
- direct observations;

- support agencies and government agencies; and/or
- third party organisations lawfully disclosing the information to K1 Payroll Pty Ltd.

Staff may only collect, use and disclose personal information in accordance with this Employee Privacy Policy and only with the express written consent of the disclosing person.

How it is stored

Information is stored in a secured location on site. These areas are locked at the end of each day.

The material/records are either hard copy in files or in electronic format on computers that have individual passwords and business security measures.

Staff must ensure that all personal information is stored securely and in accordance with this Employee Privacy Policy or any other K1 Payroll Pty Ltd policy.

Staff information is stored securely in K1 Payroll Pty Ltd's administration.

How it is used

Information gathered can only be used and disclosed for the purposes that it was provided. Information is generally used for the purposes of:

- supporting the child's enrolment process;
- developing plans and programs for each child;
- supporting families in their parenting;
- supporting staff in their employment and professional development;
- completing tasks required by the Australian and state governments; and
- supporting a multi-disciplinary team approach.

How it may be disclosed professionally

Information should only be disclosed at the direction of the Manager or in accordance with the Privacy Act or any other relevant law.

Data quality, Request for access and concerns

Staff and parents are entitled to access their own personal and private information at a suitable time and on written request. Staff and parents may request to correct or update information held by K1 Payroll Pty Ltd or may lodge a complaint with the Manager.

If Staff or a parent has any questions or concerns about the way in which K1 Payroll Pty Ltd handles collected information, then that person can contact the K1 Payroll Pty Ltd manager.

K1 Payroll Pty Ltd will deal with requests, complaints and concerns promptly and in a manner consistent with this Employee Privacy Policy or any other K1 Payroll Pty Ltd policy.

Time required to keep information

K1 Payroll Pty Ltd will maintain information for the period of time as required by law. If the law does not require certain information be maintained, K1 Payroll Pty Ltd will follow recommended guidelines for the periods of time that certain information is usually maintained.

Any information that is no longer required to be kept by K1 Payroll Pty Ltd will be securely destroyed.

Inactive records are stored securely until they have been kept for the required legal amount of time prior to being securely destroyed.

Visiting media, students, or observers

To safeguard and respect the privacy of the families in K1 Payroll Pty Ltd, visiting media, students, or observers must meet with the Manager, provide photo identification and discuss their proposed visit in full detail.

The Manager will decide whether the proposal can proceed, basing the decision on the policies of K1 Payroll Pty Ltd and where relevant, the related legislation.

Information gathered in K1 Payroll Pty Ltd is confidential and cannot be used without the informed and express consent of the Manager who will always consult with the relevant parents.

Parents wishing to video or photograph children in any manner in their group can do so only after the Team Leader in the room has the express permission of the relevant parents.

Information about matters relating to children or families (including sensitive information) may not be relayed to anyone (directly or indirectly) other than to the parents of the child it relates to unless written permission is given by the parent.

Staff

Staff must adhere to the Employee Privacy Policy, any other privacy policy and confidentiality principles in regards to other staff, children and families at K1 Payroll Pty Ltd.

All staff and students are required to sign a confidentiality agreement to this effect prior to beginning employment at K1 Payroll Pty Ltd.

Staff will adhere to the specific confidentiality measures in regards to child protection issues (Child Protection (Child Safety or similar) Policy).

Information about staff will only be accessed by relevant management personnel or the relevant Australian and state government agencies responsible for children, child protection or education and care programs.

Any documentation written by staff about children must be accurate, timely and free from bias. All documentation must be dated and contain the author's name. If staff are aware or become aware of any errors in any documentation, the staff member must immediately correct the error and inform the Manager.

Any visual images taken by staff of enrolled children in K1 Payroll Pty Ltd must not be used for any purpose other than the purpose for which the parent was originally advised and provided their consent, unless further written consent is obtained.

Privacy relating to external parties

Complaints

All complaints about a breach of privacy will be investigated by an appropriately qualified representative in accordance with our complaint handling process (which is available in hard copy on request).

We will endeavour to resolve complaint as quickly as possible and, in any event, within 28 days. The complainant will be notified of the outcome of the investigation, including how we propose to resolve the complaint and what, if any, corrective measures we will implement.

If the complainant is not satisfied with our handling of the complaint, the complainant 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>.

The appointment of a Privacy Officer

The Privacy Officer within the service will be the Nominated Supervisor/Manager.

Parents

Staff must ensure that parents respect the privacy of staff and other families at K1 Payroll Pty Ltd. Should parents be unsure or concerned about any privacy issue, they should be encouraged to discuss their concerns with the Manager.