

# Privacy Online Policy

## Policy Rationale

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Website and social media sites can provide information to potential clients on what an organisation offers. A website maintained by the education and care service can support families to make informed decisions about education and care and find out if a particular education and care service will suit their needs. Families are also able to gain contact information or request further information via email. Social media may also be utilised to support enrolled families to communicate and share information.

## Policy Overview

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### Our Aim

It is our centres policy to ensure that our website and social media site is maintained to inform families about the activities and the services provided by the organisation. Our centre respects the privacy of educators, children and families. The service seeks to keep all records private and confidential and maintains records according to the *National Privacy Principles* and the *Education and Care Services National Regulations*. Our centre develops guidelines with educators in regard to social media participation connected with their work as early childhood educators.

### Strategies

#### The Nominated Supervisor:

- Will ensure that no confidential information can be gained from the centre's website or social media site. Individuals and services are not obliged to give personal information through the website or social media site. However, if an individual chooses to provide information to a service via email, that information will remain confidential;
- Will ensure that information gained via email can only be used by administration staff or management to contact a person, offer or send information about the service and to request feedback on the website, social media site or service provided;
- Will ensure that information gained about users from the website and social media site will only be used for statistical research for the organisation to ascertain future development of the website and social media site. The following information will not be available to any other organisations:
  - IP address, the date and time of the visit;
  - Pages accessed, and documents downloaded on the site;
  - Search terms used;

- Previous site visited;
  - Network providers name;
  - Any cookies that the browser has presented to the server;
  - The browser, operating system and various plugins that were used in visiting the site.
- Will encourage families and educators to give feedback on the website and social media site and how it can be improved to meet the needs of the community;
  - Will not disclose or publish any information related to educators, children or families without written consent from that individual or their family;
  - Will develop guidelines for educators regarding their participation with families currently connected with the centre on social media sites such as Facebook, Instagram and Twitter.

### **Educators:**

Company representatives are advised that it is inappropriate, and it is unacceptable for them to make insulting, intimidating or otherwise offensive remarks about current, or past employees, or about any aspect of the company's operations (including in relation to parents, families and children or any aspect of the company's operations) on social networking sites, including but not limited to blogs, chat rooms, Twitter, Instagram, Facebook and similar, or in any other forum or medium, electronic or otherwise, in any form.

Company representatives found breaching this policy requirement will be subject to disciplinary action and depending on circumstances may be subject to termination of employment and/or legal defamation or other proceedings.

The company does not condone, in any way at all, company representatives using 'public forums' of the type listed above to make inappropriate or offensive comments.

Company representatives are encouraged not to use their personal accounts to comment on company social media pages. The admins of the social media pages are to represent the company and answer questions and make comments to encourage interaction.

### **Evaluation**

The centre's website and social media site is an information resource available to perspective families as well as current families and educators and abides by current legislation. The privacy and protection of children, families and educators is not compromised by participation on social media sites.

### **Statutory Legislation and Considerations**

- Privacy Act 1988 – [www.privacy.gov.au/law/act](http://www.privacy.gov.au/law/act)
- Privacy Amendment Private Sector Act 2000
- National Privacy Principles – [www.privacy.gov.au/materials/types/infosheets/view/6583](http://www.privacy.gov.au/materials/types/infosheets/view/6583)
- Privacy and Personal Information Protection Act 1998
- ECA- Code of Ethics
- Children(Education and Care Services National Law Application) Act 2010

- Education and Care Services National Regulations 2011
- Guide to the National Quality Standard (3) ACECQA (2011)
- Children and Young Persons (Care and Protection) Act 1998

## Direct Marketing

We may use your personal information that you have directly provided to us, to communicate with you in order to advertise our promotions and services and to inform you of our services. We may conduct these marketing activities by mail, email, telephone, SMS, social media, or any other electronic means in accordance with the Spam Act and the Privacy Act. We will always provide a way for you to opt out of receiving direct marketing messages from us (for example an unsubscribe link), and we will cease to send you direct marketing communications if you ask us to.

## Policy Reference Information

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**Education and Care Services National Regulations: 177-184**

**Link to National Quality Standard: 2.2, 4.2, 6.1, 7.1**

### Related Forms:

Social Media Permission Form  
Staff Details Form  
Enrolment Form

### Related Policies:

Enrolment and Orientation Policy  
Confidentiality Policy

### Reviewed:

This policy was **reviewed** on the **24<sup>th</sup> September 2019**  
This policy is due to be **re-reviewed** **1<sup>st</sup> July 2021**

### Sourced:

Office of the Australian Information Commissioner  
[www.privacy.gov.au](http://www.privacy.gov.au)  
**This information was sourced on the 24<sup>th</sup> September 2019**

Australian Legal Information Institute  
[www.austlii.edu.au](http://www.austlii.edu.au)  
**This information was sourced on the 24<sup>th</sup> September 2019**

Early Childhood Australia  
[www.earlychildhoodaustralia.org.au](http://www.earlychildhoodaustralia.org.au)  
**This information was sourced on the 24<sup>th</sup> September 2019**

Guide to developing a Social Media Policy  
<http://www.education.vic.gov.au/about/programs/bullystoppers/Pages/socialmedia.aspx>  
**This information was sourced on the 24<sup>th</sup> September 2019**