



# Privacy Policy

## Service Quality, Risk and Compliance

<p><b>Introduction</b></p>	<p>Learning Links is committed to respecting and preserving the confidentiality of information acquired and not releasing any such information to third parties without proper authority.</p> <p>In order that Learning Links can maintain privacy in the workplace it is important for our staff and clients to know what information may be collected and retained by Learning Links and whether it can be passed on to others.</p> <p>This policy outlines:</p> <ul style="list-style-type: none"> <li>• The kinds of personal information we collect and hold</li> <li>• How we collect, hold, and keep information secure</li> <li>• The purposes for which we collect, hold, use, and disclose information</li> <li>• Your right to access and seek correction of information</li> <li>• How we respond to complaints about privacy matters.</li> </ul>
<p><b>Eligibility</b></p>	<p>This Policy applies to all staff employed by Learning Links. The term staff also applies to students, interns, and volunteers. This policy also applies to workers carrying out work on behalf of Learning Links (e.g., contractors).</p>
<p><b>Policy</b></p>	<p>Our programs and services for children and their families make it necessary to collect, store and use personal information, including sensitive information, about individual children and their families.</p> <p>Establishing a trusting relationship with our internal and external stakeholders is central to our work practices.</p> <p>Authorisations for the specific consents required across programs and services are included on the documents Learning Links requires clients to complete.</p> <p>Information about staff, donors, members, government and non-government agencies, suppliers and other organisations engaged with Learning Links may also be collected.</p> <p>Staff will not disclose third party personal information with other Learning Links professionals without the authority and permission to do so. Staff will confirm that authority to share information internally has been given.</p> <p>Staff will not disclose third party personal information to external parties without the authority and permission to do so and will only provide information to a third party that meets a lawful request.</p> <p>Learning Links informs our customers/clients that we are collecting their personal information, and how we may use that information (including the restrictions on sharing it with others), and what we do to protect the information and keep it confidential.</p>
<p><b>Types of information we collect</b></p>	<p>The type of information that we collect, and hold, depends on the nature of a person's involvement with us.</p> <p>We only collect your personal information where it is reasonably necessary in relation to one or more of our functions or activities, or where the law requires us to collect it.</p> <p>Depending on the reason for collecting it, the personal information we collect may include (but is not limited to):</p> <ul style="list-style-type: none"> <li>• Your name and contact details</li> <li>• Copies of identification documentation</li> <li>• Payment information and banking details if you are Accessing a service and/or purchasing a product through us</li> <li>• Personal Information contained in forms or applications</li> </ul>

- Personal Information contained in queries, or feedback about Learning Links services
- Usage data. This may include your IP address, the pages you have clicked through on our websites, websites that referred you to our sites, information about the device you are using, and your wider geographic location

In some circumstances, we collect sensitive information which requires a higher level of protection under the Privacy Legislation. We consciously limit how much sensitive information we collect, and we only collect it when we have your consent, and the collection is reasonably necessary for us to support one or more of our functions or activities.

Learning Links does not adopt any government-related identifiers of individuals that have been assigned by an agency, an agent of an agency, or a contracted service provider for a government contract. Exceptions to this rule occur when we are corresponding with agencies including the NDIS and are required to use the allocated identifiers including the NDIS plan and identification numbers.

**Personal and sensitive information collected from staff includes:**

- Tax file number
- Bank account details
- Driver's licence number
- Previous employment information
- Next of kin
- Emergency contact details

**How we collect information**

Learning Links only collects personal information that is necessary for us to provide services to people or help them access the services they need.

We ask clients for personal information when it is reasonably necessary for the activities in which they are seeking to be involved.

We will only collect personal information by lawful and fair means, including by telephone, by letter, by email, or through forms on our websites.

Normally, we collect personal information directly from our clients (or the relevant individual), unless it is unreasonable or impracticable to do so.

We may collect personal information from agents, contractors, subcontractors, employees, representatives, users of other services and volunteers.

On occasion, we may collect personal information from a third party. For example, personal information may be provided by third party websites.

We collect user data through the use of cookies.

We generally obtain consent from the owner of personal information to collect their personal information. Learning Links requires written consent to obtain and store your personal information.

Individuals are not required to provide the personal information and/or sensitive information we request. However, if you choose not to provide it, we may not be able to support your needs.

External stakeholders are free to browse our websites anonymously. When clients referred to us by other organisations are registering for one of our services, we require that they register an account using their name or a pseudonym and provide a valid email address.

Receipts (especially tax-deductible receipts) may be invalid unless accurate information, including your real name, is provided.

<p><b>Information we collect on behalf of others</b></p>	<p>At times we collect personal information from our clients for the purpose of submitting grant applications and/or funding accountability reports required by government agencies:</p> <ul style="list-style-type: none"> <li>• We process personal information when required in accordance with instructions from the funding body or external grant assessor for the purposes of the grant.</li> <li>• The funding body or external agency administering the grant is responsible for the data we collect and store on their behalf</li> </ul> <p>A form may ask you to provide personal information. Please contact us directly if you have any questions about any request from us regarding your personal information.</p>
<p><b>How we deal with unsolicited personal information</b></p>	<p>At times, we may receive personal information from a client or a third party without having asked for it. We manage this by:</p> <ul style="list-style-type: none"> <li>• Determining whether the personal information obtained is reasonably necessary for, or directly related to, our functions or activities.</li> <li>• Following that if we determine the information is not reasonably necessary for these purposes, as soon as practicable, we either destroy the information or ensure that it is de-identified, so long as it is lawful and reasonable to do so.</li> </ul>
<p><b>How we use your personal information</b></p>	<p>We use your personal information for a range of purposes, including:</p> <ul style="list-style-type: none"> <li>• Providing you with our services</li> <li>• Improving our services through quality-improvement activities</li> <li>• Providing information, news, offers and conducting surveys</li> <li>• Helping you to access the most appropriate information and tools associated with our websites</li> <li>• Providing you with support if you need technical assistance</li> <li>• Processing payments, including donations</li> <li>• Communicating important service-related announcements, changes to our services or policies</li> <li>• Answering enquiries and resolving complaints</li> <li>• Complying with directions from authorities or legislative requirements</li> <li>• Screening for or preventing potentially illegal or abusive activity</li> <li>• Storing your data so it is available for your future use of our services.</li> </ul> <p>We may also collect, hold, use and disclose personal information for purposes:</p> <ul style="list-style-type: none"> <li>• Which we explained at the time of collection; or</li> <li>• Which are required by law; or</li> <li>• For which you have provided your consent.</li> </ul> <p>Learning Links may use personal information for the purpose of direct marketing where we perceive that our clients and potential clients would reasonably expect us to use or disclose the information for that purpose:</p> <ul style="list-style-type: none"> <li>• We respect requests from clients who do not want to be contacted. All direct marketing communications from us state that the individual can request not to receive direct marketing communications from Learning Links.</li> </ul> <p>If you have any concerns about us using your personal information in any of these ways, please notify us immediately.</p>
<p><b>How we protect personal information</b></p>	<p>Learning Links takes reasonable steps to protect personal information/images we hold against misuse, loss, unauthorised access, modification and disclosure.</p> <p>These steps include:</p> <ul style="list-style-type: none"> <li>• Setting password protection for electronic files and databases</li> <li>• Securing paper files with sensitive information in locked cabinets</li> <li>• Taking reasonable steps to ensure that, when no longer required, personal information/images are destroyed in a secure manner or deleted.</li> </ul> <p>Personal information no longer required will be treated according to existing law and regulations and may be securely stored offsite with a third party.</p> <p>If you would like to access your personal information, you can request to do so.</p>

	<p>We will allow you to access your personal information unless there is a sound reason not to, including where:</p> <ul style="list-style-type: none"> <li>(a) giving access would have an unreasonable impact on the privacy of others; or</li> <li>(b) we consider that your request for access is frivolous or vexatious.</li> </ul> <p>If we refuse to give you access to your information, we will provide you with information explaining our reasons.</p> <p>If you believe that information we hold about you is incorrect or out of date, please contact us via email and we will take all reasonable steps to amend the information in line with your request.</p>
<p><b>Why we share information</b></p>	<p>Learning Links does not give information about a person to other organisations, government agencies or anyone else unless one of the following applies:</p> <ul style="list-style-type: none"> <li>• Consent has been received</li> <li>• The person reasonably expects us to, or we have told them we will</li> <li>• It is required or authorised by law</li> <li>• We believe the disclosure is necessary to prevent or lessen a serious threat to somebody's life, health or safety and it is unreasonable or impracticable to obtain the person's consent</li> <li>• There is a subpoena to produce documents for confirmed court proceedings</li> </ul> <p>When releasing information, no information belonging to another individual (i.e., a third party) can be released without that party's consent. In this instance only that part of the information relating to the parent who requested the information should be provided.</p>
<p><b>Maintaining confidentiality</b></p>	<p>Confidentiality of client records is unable to be guaranteed in the following situations:</p> <ul style="list-style-type: none"> <li>• If the client is under 18 years of age and it has been carefully determined that the client has an understanding of making independent privacy decisions in consultation with relevant staff and the parent/carer.</li> <li>• Staff have been informed about / or suspect that a child (under 16) is being abused, or is at risk of abuse, and as Mandatory Reporters follow the Child Safe Policy and/or Child Safe Procedure.</li> <li>• Where information relates to existing or anticipated legal proceedings between the organisation and the individual.</li> </ul> <p>Information about a client cannot be released without explicit, written, signed consent from the parent / carer unless mandated by legislation to do so.</p>
<p><b>Staff information</b></p>	<p>All applicants and staff currently employed have the right to access information about themselves created during recruitment and selection process. This includes information regarding reasons for appointment of the successful candidate and why they did not obtain the position.</p> <p>All requests for access to information should be addressed to the People and Culture team: <a href="mailto:peopleandculture@learninglinks.org.au">peopleandculture@learninglinks.org.au</a>.</p> <p>Learning Links regards selection processes as confidential and will seek to maintain the privacy of personal information obtained during the process.</p>
<p><b>Related Documents</b></p>	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Feedback Policy</li> <li>• Information Security Policy</li> <li>• Client Record Policy</li> <li>• National Disability Insurance Scheme (NDIS) Policy</li> </ul>

## Review

This policy and guidelines will be reviewed every two years and will incorporate current information, legislation and feedback as required.

Policy Date: 18 March 2022

Policy Review: 18 March 2024

Review by: GM, Service Quality, Risk and Compliance

Approval: CEO

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