



Playgroup Policy

Confidentiality, Privacy and Digital Information Security

Purpose of this requirement

To ensure that all information and documentation relating to Mapoon Playgroup and business activities is securely stored and treated appropriately at all times. This is primarily to ensure the privacy of children, families and staff and the protection of their personal information, but Mapoon Playgroup also has responsibility for a significant amount of other information, which, like other important business assets, has value, and needs to be suitably protected.

Mapoon Playgroup can be exposed to significant risk (such as damage to the Mapoon Aboriginal Shire Council brand, breach of privacy law, and so on), through unauthorised or inappropriate use or release of information and/or through the accidental or deliberate loss of data or damage to equipment on which the information is stored. This requirement is intended to help mitigate that risk.

Definitions

Confidential Information:

- names, details and information relating to children attending Mapoon Playgroup centres and their families, caregivers and guardians;
- personal details and information relating to Mapoon Playgroup staff members;
- Mapoon Playgroup documentation and materials, including but not limited to, information pertaining to its policies, procedures and practices, commercial affairs, financial information, strategic and business plans and 'like information' relating to any Mapoon Playgroup business activity;
- other information which Mapoon Playgroup informs the staff member is confidential or which, if disclosed, the staff member knows, would be detrimental to Mapoon Playgroup; and
- all other information which is imparted to the staff member in circumstances which the staff member knows or ought reasonably to know means that the information is confidential to Mapoon Playgroup or to any persons with whom Mapoon Aboriginal Shire Council is concerned, but excludes any information that is public knowledge.

Applicability of this requirement

Confidentiality and privacy

All staff:

- may use confidential information solely for the purposes of performing their duties as a Mapoon Playgroup staff member;
- must keep confidential all information and documentation, in whatever form, deemed to be "confidential"; and
- may only disclose confidential information to persons who are aware that the confidential information must be kept confidential and who have a need to know that information (but only to the extent that each person has a genuine need to know).
- may only access information, relating to the execution of their duties;
- must ensure that all ICT assets provided are kept physically secure and that they are returned once the need for them has concluded;
- must ensure that access to the ICT environment is not shared with other persons; and
- must ensure that any information security breaches are reported to the ICT Department for action.

Staff Member's obligations of maintaining confidentiality do not extend to confidential information that the law requires to be disclosed.

In addition, Coordinators:

- Must ensure that levels of access to information for their team/s is suitable and adequate for execution of their duties and does not provide additional access not required to perform their duties;
- Must ensure that access is not granted for situations whereby a segregation of duty conflict will occur.

At the end of employment, staff members must return to Mapoon Playgroup all confidential information including:

- any company records or information; and
- all of Mapoon Playgroup's property in the staff member's possession or control.

No personal information regarding Mapoon Playgroup's affairs is to ever be disclosed to outside parties. The staff member's obligation of confidentiality continues after the end of employment.

Any staff member found to be in breach of this requirement whilst still employed by the Mapoon Aboriginal Shire Council will be disciplined, and in serious instances, may be dismissed.

Any former staff member found to be in breach of the confidentiality obligations set out in this requirement may be subject to legal action being taken against them, dependent upon the circumstances of the breach.

This requirement will operate in conjunction with the staff member's employment contract obligations.

Digital information security

Authentication

To ensure information and data is protected, all devices used to access Mapoon Playgroup information require a minimum level of security features to be enabled and configured.

Any security features used will remain private and not shared with other individuals or parties.

Staff will be held accountable for the uses to which Mapoon Playgroup information is put when it is accessed under their login credentials.

As a minimum Mapoon Playgroup requires the following protection be used on any device accessing Playgroup information and data:

- In the case of mobile devices (phones and tablets) a PIN – 4 digit numeric

For all other devices a password which:

- Is 8 characters long
- Uses both alpha-numeric-symbol combinations (eg contain: A-Z, a-z, 0-9,!,@,#,\$,%^,&*,(,),<,>)
- Does not consist of simple words or words followed by single digits – eg Explorer1

The system enforces these criteria to the extent that passwords must contain certain elements, but it does not enforce the combination of these elements into a password.

It is a requirement that staff do not use simple words or children's names, as this dilutes the security of the password.

Access to a device will be rejected after 3 consecutive failed login attempts.

Maintenance and disposal of equipment

Equipment used to hold and manage Playgroup information will not exceed the age limits set by the vendors for maintenance and support. A risk assessment will be performed and documented for circumstances whereby vendor maintenance is not renewed for hardware items.

Mobile equipment (e.g. laptops and mobile phones)

It is the responsibility of all individuals issued with mobile devices owned by Mapoon Playgroup to ensure the device is stored and kept safely and securely and, for example, not left in public places or in unattended vehicles.

A staff member issued with a mobile device is accountable for the device while it is registered to the staff member.

This includes the device's security and physical treatment of the device. Mapoon Aboriginal Shire Council may seek reimbursement or replacement of the device for loss or damage in the case of inappropriate handling or use.

The IT department will maintain both a register and signed mobile device agreement for mobile equipment. The mobile device agreement will indicate the staff member's acceptance of the conditions around the use of the mobile device/s and return of the device.

Photographs and videos

Parental or guardian consent must be given before children are photographed or videoed. This should be obtained at first attendance. Where parents or guardians disagree over provision of consent it is deemed not to have been given.

Separate permission must be sought for photographs or videos to be used outside the centre, usually for marketing purposes (see NQS6 Image Consent Procedure).

Photographs and videos must only be taken using cameras and other devices provided by Mapoon Playgroup.

No photographs or videos of children or centres, which may only be taken for purposes associated with Mapoon Playgroup and business functions, may be taken or removed from the centre on personal equipment.

Photographs and videos must not be shared between staff members unless there is a relevant business purpose.

To help ensure secure storage of photographs and videos and to minimise the risk of them being inadvertently removed from the centre, they must not be downloaded to personal devices. Nor should they be sent outside Playgroup in electronic form, such as attached to an email.

All images, except those to be used for official marketing purposes, must be archived after three months and deleted after six months. This is to help ensure the long-term security of the images, make storage capacity available for new images, ensure that personal data is only kept for a reasonable period consistent with the need to support early learning and other business activities, and to ensure compliance with regulatory requirements.

Information security incidents

All information security incidents will be reported immediately to Mapoon Aboriginal Shire Council.

Responsibilities

This requirement is to be implemented by: All Mapoon Playgroup Staff.