

Personal information collected by The Bryan Education Foundation (TBEF) is protected by the [Privacy Act 1998 \(Cth\) Privacy Act](#). Personal information is any information or an opinion that identifies an individual or is reasonably identifiable and includes sensitive and health information

## Overview

The Bryan Education Foundation (TBEF) is committed to protecting the privacy of individuals and handling personal information in a responsible and transparent manner. This Policy outlines how personal information is collected, used, disclosed, and managed. TBEF takes privacy obligations seriously and handle personal information in accordance with all relevant standards and legislation including [Privacy Act 1988](#).

## What is 'personal information'?

In this Policy, personal information refers to information and/or an opinion about an identified individual, and/or an individual who is reasonably identifiable.

It includes information or opinion:

- whether the information or opinion is true; and
- whether the information or opinion is recorded in a material form or not.

Personal information includes 'sensitive information' such as health information. It includes information that TBEF requests. It also includes information, which is given to TBEF that has not requested.

## Why personal information is collected

All employees and client/ service users are informed when and why personal information is collected.

When relevant, information is collected to:

- comply with legislative requirements.
- perform management, employment and personnel functions in relation to employees, and volunteers.
- manage and develop business and operational processes and systems.
- promote data sharing or data integration with other TBEF initiatives.
- enable activation of support through various services and programs and determine program effectiveness.
- manage relationship with service users, including confirmation of identity, responding to queries or requests, and contacting participants for follow-up purposes.
- inform participants of TBEF activities, including through the sending out newsletters and electronic communications (e.g., provide information to parents that may be of interest to enrolled families).
- conduct marketing and promotional efforts, including fund raising and/or allocation based on program need and usage.

- manage and resolve any legal or commercial complaints.
- administer requests received under the Privacy Act.
- prevent, detect, investigate, and address corruption, misconduct and fraud, cyber-attacks, or other unlawful activity.
- inform education and training delivered to employees and personnel of service providers.
- policy development, research, and evaluation.

Participating families can opt-out of receiving marketing communications during enrolment or later by contacting TBEF office on **07 3004 1222**.

## Types of personal information TBEF collects

The kinds of personal information that may be collected and held includes:

- identifying information, such as name and date of birth.
- details of services provided to specific users.
- information about how various provided services are used.
- records of interactions with service users
- contact information, such as address, email, and telephone number(s)
- financial information, such as credit card, bank account or other payment details
- details of products or services provided by services.
- government-issued identifiers - such as tax file numbers (e.g., TBEF employees)
- social media handles and other social media profile information participants shared.
- relevant participant or personnel health information.

## Tax file numbers

A tax file number (TFN) is a unique identifier issued by the Commissioner of Taxation. TBEF collects TFNs for the following purposes of making payment of salaries and wages to eligible employees.

TBEF's collection of TFNs is authorised under the [Income Tax Assessment Act 1936](#) and the [Taxation Administration Act 1953](#). Employees are not legally obliged to quote their TFN, but there may be financial consequences if this information is not shared.

## Choice to provide personal information?

TBEF respect and acknowledge that employees and service users have the right to make decisions about the personal information they provide for themselves and their family. It is understood that some personal information is required for certain business, educational and communication purposes within the FamilyLinQ hub, and TBEF strives to provide flexibility and accommodate parental choices.

## Impact of Withholding Information:

While the aforementioned parties have the right to withhold certain personal information, it is important to understand that doing so may limit the full extent of benefits and participation and within TBEF. Specifically:

- **Limited Communication:** Withholding contact details may result in a limitation of effective communication and referral between engaged business/ community services entities, and the programs they provide.
- **Event Participation:** Some events and activities may require certain personal information for participation, and withholding this information may affect eligibility to participate.
- **Safety and Security:** Sensitive information may be necessary to ensure the safety and security of all employees and service users while engaging in various activities.

TBEF is committed to maintaining the security and confidentiality of all data shared, whether mandatory or optional. Open communication with TBEF staff to address any concerns or preferences related to personal information sharing is encouraged, and TBEF takes every effort to accommodate personal choice while ensuring the continued effectiveness of business operations and service delivery.

## Responsibilities

### Employees and service users

Are responsible for providing accurate and up-to-date personal and family information as required and communicating consent when needed.

### Mandatory Information

Certain personal information, such as full names, emergency contact details, dates of birth, and any serious medical concerns (that if not addressed would lead to serious illness/death) are considered essential for the effective business operation and service delivery. Service users are encouraged to provide this information to facilitate their full participation in all services/ programs provided.

### Optional Information

TBEF may request optional personal information, such as additional contact information or less serious medical details. Employees and service users have the choice to provide or withhold optional information, and this decision will not impact their participation in TBEF initiatives.

### Consent and Communications

In addition to collecting personal information, various consents will be sought from employees and service users. Some consents will be mandatory, such as recognition of TBEF [Code of ethics and conduct policy](#), while others will be optional, such as a media/ photo release or receiving general communications from service providers, allowing greater flexibility of choice. Consent to share personal information will be sought when a referral between internal services/ programs and external services is required.

## The Bryan Education Foundation

All employees and service providers of TBEF are responsible for ensuring the privacy and security of personal information collected and used in daily operations. The principles below address each responsibility of TBEF with regards to personal information.

### Data quality

Reasonable steps are taken to make sure that all personal information collected and stored is accurate, up-to-date, complete, relevant, and not misleading.

### Security Measures

Appropriate security measures have been implemented and to safeguard personal information collected. This includes but is not limited to encryption, access controls, and regular security audits to prevent unauthorised access, disclosure, or breaches.

### Consent and Data Access

Processes to obtain and document the necessary consents from employees and service users are in place and are clearly communicated. Additionally, employees and service users have means to access and correct personal information if it is found to be inaccurate or incomplete.

### Privacy Compliance

All policy and procedures are in compliance with relevant privacy laws and regulations, particularly those specific to educational and integrated community hub settings. This includes complying with the [Privacy Act 1988](#) and the Australian Privacy Principles (APPs).

### Communication

Open and respectful communication is valued and welcomed with all personal and service users in relation to how personal information is collected, used, and disclosed within TBEF. This includes regular updates and notifications about changes to the privacy policy and data handling practices.

### Training and Awareness

Employees and relevant service provider personal are provided with training to ensure they understand the importance of privacy and data protection, as well as their roles in upholding these principles.

### Incident Response

In the event of a data breach or privacy incident, TBEF is responsible for taking swift and appropriate action to address the breach, mitigate harm, and report the incident to the relevant authorities and affected individuals, as required by law.

### Compliance Reviews

Regular reviews and audits of data handling processes and practices are conducted to ensure ongoing compliance with privacy laws and the protection of personal information.

## Handling service user inquiries

Procedures are in place for addressing inquiries and concerns from service users regarding the handling of personal information. This includes providing information about data usage, access requests, and addressing privacy-related issues.

In summary, TBEF has a significant responsibility to ensure that personal information is handled with the utmost care, in compliance with privacy laws, and in a manner that fosters trust among employees, service providers and users, including school staff. This includes collecting data responsibly, protecting it from unauthorised access, and providing clear channels for consent, access, and communication.

## Process

### Information collection

#### TBEF collects personal information from:

- job applicants.
- volunteers.
- enrolled families.
- participating community services and suppliers.
- the general public (such as visitors to the hub and website,).
- other business and research partners.

#### Personal information is collected when:

- service users accept assistance from TBEF and receive products or services.
- donations are received.
- community members volunteer.
- various organisations provide us with products or services.
- Service users submit a query or request.
- service users and providers respond to a survey or complete program forms.

#### Personal information is collected via:

- face-to-face interactions in programs and/or appointments.
- over the phone communications including personal appointments.
- email when responding to queries.
- the internet (including webpages and social media platforms) and the completion of digital forms.
- written communication received.

### Electronic communication and collection

TBEF recognises current risks associated with sharing information over the internet, including emails. Depending on the nature of information being shared employees and participating families are encouraged to select the most appropriate medium available and that they are comfortable using.

## Passive collection

Information, including personal information, is collected by a variety of software applications, services and platforms used via personal devices. This type of information collection is 'passive' as TBEF is not collecting this information directly and it does not directly relate to TBEF's provision of services.

Users can opt out of some of these passive data collections, including by:

- disabling / refusing cookies.
- disabling JavaScript.
- opting-out of Google Analytics.
- disabling location services on your device.

Additional advice regarding how to protect yourself online can be found at [Stay Smart Online](#).

## Active collection

TBEF directly collects some personal information, via its website. Once again, this information is collected to enable TBEF to carry out its functions properly and efficiently and deliver services to the community.

No attempt is made to identify individuals through their browsing other than in exceptional circumstances when an investigation into the improper use of the website is required.

The table below summarises both passive and active collection and the type of information collected.

Information may be collected by:	Type of information:	Information collected to:
<b>Passive</b> <ul style="list-style-type: none"><li>• Internet browser</li><li>• Cookies</li><li>• Google Analytics</li><li>• Social media platforms</li><li>• Qualtrics</li></ul>	<ul style="list-style-type: none"><li>• Your ...<ul style="list-style-type: none"><li>▪ browser type</li><li>▪ browser language</li><li>▪ server address</li><li>▪ location (where location services are enabled on your device)</li><li>▪ top-level domain name (e.g., .com, .gov, .au, .uk)</li></ul></li><li>• Date and time you accessed a page on our site.</li><li>• Pages accessed and documents viewed on our site.</li><li>• How our website was accessed (e.g., from a search engine, link or advertisement)</li></ul>	<ul style="list-style-type: none"><li>• Measure the effectiveness of our content.</li><li>• Better tailor our content to our audience.</li></ul>
<b>Active</b>	TBEF	<ul style="list-style-type: none"><li>• Deliver services to you</li><li>• Contact you</li><li>• Identify you</li><li>• Subscribe you to a service or update you have requested</li><li>• Evaluate our programs</li><li>• Inform policy development</li></ul>

## Links to external websites and social networking services

While TBEF does include links to other websites on its website it is not responsible for the content and privacy practices of other entities. Social networking services will also use personal information for their own purposes and have their own privacy policies. In both instances it is recommended that employees and enrolled families examine the privacy policies of each service and website when if they wish to know how their information will be handled.

## Disclosure of personal information

When personal information is collected, signed consent is captured prior to any information being shared. Information is usually shared:

- to assist enrolled families with greater ease of access to community services, both within the FamilyLinQ hub and external in the community, and
- when there are legal authority or regulatory body requirements that the TBEF must adhere to by law.

In some cases, personal information may need to be disclosed to another party located overseas for a purpose set out in this policy. The situations in which TBEF may disclose personal information overseas include:

- the publication on the internet of material which may contain personal information, such as departmental reports and other documents; photographs, video recordings and audio recordings and posts and comments on our social media platforms (where consent has been given for this or TBEF are otherwise authorised by law to provide this information).
- the provision of personal information to overseas researchers or consultants (where consent has been given for this or TBEF is otherwise authorised by law to provide this information).
- where individual's use an email account that stores data on an overseas server and
- where people post and comment on our social media platforms.

Any limitations to information protection during this process will be discussed with the relevant parties as required.

## Privacy Impact Assessments

A privacy impact assessment (PIA) is a systematic assessment of a project that identifies the impact that the project might have on the privacy of individuals, and sets out recommendations for managing, minimising, or eliminating that impact.

The [Privacy \(Australian Government Agencies – Governance\) APP Code 2017](#) (Privacy Code) requires TBEF to undertake a PIA in certain instances and to maintain a register of those PIAs from 1 July 2018. In accordance with the Privacy Code, TBEF may publish the PIA Register.

## Storage and security of personal information

The TBEF is committed to safeguarding personal information and employ reasonable security measures to protect it from unauthorised access, disclosure, alteration, or destruction.

Personal information collected electronically is stored in electronic databases. Some of these databases are held on behalf of the TBEF by third party data storage providers. All hard copy records of personal information are held in secure storage.

For example, sensitive information collected such as health information, is stored both physically and electronically, with access limited to relevant TBEF and/or service provider personal as they have need, as informed by their approved duties.

TBEF takes reasonable steps to ensure storage processes and protection are kept up to date to address new and emerging security threats. In addition, personal information is only stored for as long as it is needed and/or required by law and then is destroyed or de-identified.

## Access and control of personal information

TBEF employees and service users have the right to access, correct, or delete their personal information.

In addition to this, employees and service users may wish to raise concerns and/or complaints they have with how their information is managed.

For these matters employees and service users can contact TBEF by phone **07 3004 1222**, or email [info@thebryanfoundation.org.au](mailto:info@thebryanfoundation.org.au). In some cases, proof of identity will be required.

If an employee or service user feels their concern/ complaint has not been resolved satisfactorily they are entitled under the *Privacy Act* to make a complaint to the Office of the Australian Information Commissioner. The office can be contacted by:

- phone on 1300 363 992.
- Teletypewriter (TTY) users' phone **133 677**, then ask for **1300 363 992**.
- Speak and Listen users' phone **1300 555 727**, then ask for **1300 363 992**.
- Internet relay users connect to the [National Relay Service](#), then ask for **1300 363 992**.

In some cases, information will not be provided if for example it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, explanation will be shared with the relevant party.

## Changes to this policy

TBEF may update this Policy as necessary to reflect changes in practices or for legal compliance. Any updates will be communicated on the website.