
1. Purpose

The Creche & Kindergarten Association Limited (**C&K**) values the privacy of parents, guardians, children, families, students, participants in our programs, suppliers, staff and all other individuals with whom we communicate. We will collect, use, share and store personal information that is reasonably necessary to carry out the functions and activities of C&K to:

- Provide early childhood education and care services to children and families
- Disseminate and promote knowledge of the principles of care, guidance and education of children in early childhood
- Encourage and maintain the highest standard of Children's Services
- Operate the C&K College of Early Childhood (College) and provide training to educators in the early childhood education and care sector and
- Carry out other functions and purposes necessary or incidental to achieve the objects of C&K (**Our Purpose**).

This Policy outlines:

- Why we collect personal information
- What personal information we collect
- How we collect the personal information and obtain your consent
- How we use the personal information
- How we store and protect your personal information
- How you can access and correct your personal information
- How you can make a privacy complaint

2. What information we collect

C&K is bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (Privacy Act), which regulate the way we collect, use, share and store your personal information. The College is also regulated by the National VET Provider Collection Data Requirements Policy prescribed by the *National Vocational Education and Training Regulator Act 2011* (Cth) (**NVETR Act**).

We collect, hold and use personal information, defined in section 6 of the Privacy Act as "information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not."

Sensitive Information is a type of personal information and includes any information or opinion about your racial or ethnic origin, political opinions, association memberships, sexual preferences or practices, religious beliefs or affiliations, criminal history and health or disability status (including genetic and biometric information).

The personal information we collect will vary depending on how we interact with you but might include:

- a) Full name
- b) Address
- c) Date of birth
- d) Gender
- e) Contact details (including email, address and phone number)
- f) A child's nominated medical practitioner and or authorized health contact, emergency contact, leave contact and person nominated to collect the child at any of our services,
- g) biometric scanning information
- h) Copies of identification documents, such as birth certificates
- i) FEE-Help Status
- j) Financial information such as tax file numbers, bank account and credit card details;
- k) Centrelink Customer Reference number
- l) Court orders, including custody arrangements
- m) Health information including medicare number, details of a child's health care or dietary needs (including medical conditions and allergies and risk of anaphylaxis), medical management or risk minimization plan in relation to any medical conditions and immunization status and records
- n) religion, cultural background and language spoken at home
- o) Any information relating to special requirements for a child's care
- p) Photographs, video images, artwork or pictures

4. How we collect personal information

We may collect personal information in many ways, including (but not limited to):

- a) In writing or online when you complete enrolment documents for your child to attend our services
- b) Photographs, video image or pictures of children and families attending our services (you can tell us if you do not wish this information to be used when you complete our enrolment booklet)
- c) Children's portfolios
- d) Visiting our website (which may include cookies and analytics)
- e) Signing up for an email list
- f) Registering for an event
- g) Providing feedback through our website or to one of our services
- h) Emailing us
- i) Making a complaint
- j) Completing a survey
- k) Participating in social media related to C&K
- l) Enrolling and studying at our College

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- m) Participating in a program or delivering a service to C&K
 - n) Entering into a contract for the supply of goods and service C&K
 - o) Applying for a grant or tender administered by C&K
 - p) Participating in a project and / or partnership with C&K
 - q) Participating in research with C&K
 - r) Applying for employment or volunteering with C&K
 - s) Accessing information publicly available from other sources or third parties

We will notify you when we seek to obtain personal information and obtain your consent to collecting sensitive information. You can tell us if you don't want us to use your information at the time it is collected or as soon as practicable thereafter. If you do not wish us to collect and use your personal information we may not be able to provide services to or assist you.

5. How we use the personal information

We use the personal information we collect to achieve Our Purpose, which includes activities to:

- a) Provide early childhood education and care services or any other service connected to Our Purpose (including setting fees, delivering services, funding arrangements, and access to services and funding);
- b) Advocate for the well-being, protection and development of children and early childhood education and care
- c) Undertake research or development activities in respect of C&K's current or future business activities
- d) Participate in research projects related to early childhood education and care
- e) Share information about children's activities with their families, through portfolios and online portals
- f) Document C&K's early childhood education and care practices
- g) Communicate with you via letters, emails, SMS, online portals, electronic sign in/out, surveys and other communication channels
- h) Comply with our legal obligations, including making disclosures required or authorized by law, a court or tribunal, and government authorities
- i) Submit Australian VET Management Information Statistical Standard compliant data to the National VET Provider Collection in accordance with the NVETR Act
- j) Implement operational processes and systems to enable C&K to conduct its operations
- k) Communicate with our service providers to provide early childhood education and care services or the conduct of those services, (including providers that host our website servers and our insurance providers)
- l) Develop and improve the activities undertaken at the College
- m) Promote and market C&K and any of its services and activities
- n) Facilitate the review of C&K's services, policies, procedures and processes in the continual improvement of C&K's offering to the public
- o) Develop training programs and materials to deliver high quality early childhood education

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Area - Governance

- and care programs
- p) Manage complaints and internal reviews and investigations; and
- q) Manage our risks.

We will not use or disclose personal information for any **other** purpose unless:

- a) You have consented;
- b) You would reasonably expect us to use or disclose the information for another purpose which is directly related to our primary purpose; or
- c) we are required or authorised by law and/or under the Privacy Act.

6. How we store and protect your personal information

C&K takes reasonable steps to protect the security of personal information we store from loss, misuse or unauthorised modification, by, as far as is practicable:

- a) Keeping personal information collected accurate, up-to- date and complete
- b) Regularly assessing the risk of misuse, interference, loss or unauthorised access or disclosure of personal information
- c) Holding all relevant personal information on an electronic database maintained on our server or on the secure server of an IT service provider used by us and only allowing that information to be accessed by persons authorised by C&K
- d) Holding any original documentation provided to us in safe and secure storage and only allowing the information to be accessed by persons authorised by C&K
- e) Destroying any personal information no longer needed in a secure manner in accordance with relevant policy and procedure
- f) Conducting internal audits to assess whether we have complied with these security measures
- g) Regularly training our staff in data handling procedures and Privacy Act principles
- h) Requiring any third party service providers to only use or disclose the information for the purposes of the contract.

Data Breach

If an eligible data breach, within the meaning of the Privacy Act 1988, occurs C&K will take the required steps under the Privacy Act 1988 to assess the nature of the breach, mitigate the risk of damage arising from the breach and, if required, notify the individuals to whom the information relates and the Australian Privacy Commissioner.

Overseas data storage

We use third party service providers to assist us in delivering services to you. Some of your personal information may be stored on the servers of service providers located in the United States of America and other countries. We will take all reasonable steps to ensure that your

personal information is protected in accordance with the Australian Privacy Principles, including:

- a) determining if the recipient is subject to a legal or binding scheme that provides similar protection to the Australian Privacy Principles
- b) entering into contractual arrangements requiring appropriate standards of privacy
- c) seeking the consent of individuals prior to transferring the information or
- d) as is otherwise permitted by law.

7. How to access or correct information

You have the right to access the personal information we hold about you and ask that we correct that information by contacting our Privacy Officer. We will respond to your request within 30 days unless there is a lawful reason for not doing so. We may ask you to verify your identity before we give you access to your personal information or correct that information. We will notify you in writing if we refuse to grant you access or modify your personal information.

8. How to Make a Complaint

If you have a complaint about a possible breach by C&K of the Australian Privacy Principles relating to your personal information, please contact C&K's Privacy Officer in writing at the following address:

Email: info@candk.asn.au
Postal: C&K Privacy Officer
257 Gympie Road
Kedron QLD 4061

We will consider your complaint and respond to it within 30 days.

If you believe your complaint remains unresolved, you may take your complaint to the Office of the Australian Information Commissioner. The contact details for the Office of the Australian Information Commissioner can be found via its website located at www.oiac.gov.au and are also listed below:

Office of the Australian Information Commissioner

Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

We appreciate your feedback regarding our privacy policy. If you have any comments or queries, please contact C&K via email on info@candk.asn.au

9. Amendments to the policy

We may change this privacy policy at any time without prior notice. When we do make any

changes, we will notify you of the changes by posting an updated version of the policy to our website.

This policy was last updated on 28 November 2018.