

## Commitment

The Creche and Kindergarten Association Ltd (C&K) is committed to protecting the privacy of all people with whom we communicate. C&K will collect, hold, use and disclose only the personal information that is reasonably necessary to carry out our functions and activities, and will be bound by the Australian Privacy Principles set out in *the Privacy Act 1988* (Cth) (Privacy Act) and the *National Vocational Education and Training Regulator Act 2011* (Cth) (NVETR Act).

## What personal information we collect

C&K collects and uses 'personal information' (as defined in the Privacy Act):

Personal information:

- information or an opinion about an identified individual, or an individual who is reasonably identifiable
- can be true or false, verbal, written or photographic
- can be recorded or unrecorded
- includes a person's name, address, contact details, social media platform username, date of birth and gender

Sensitive information (a subset of personal information) includes information about a person's:

- race or ethnic origin
- political opinions and memberships
- religious beliefs
- membership of a trade union or professional association
- sexual preferences or practices
- criminal record
- health information, including genetic, biometric, physical and mental health, disability, use of health services and COVID-19 vaccination status.

## Why do we collect, hold, use and disclose your personal information

We collect, hold, use and disclose personal information to achieve Our Purpose to:

- Provide you and your children with the highest standard of early childhood education and care services
- Operate the C&K College of Early Childhood (College) and provide training to educators in the early childhood education and care sector
- Advocate for children and the early childhood education and care sector
- Run our business
- Comply with Public Health Directions
- Carry out other functions and purposes necessary or incidental to achieve Our Purpose.

In order to achieve Our Purpose we use and disclose personal information to:

- Set fees, improve our centres and meet our obligations under funding arrangements
- Share information about children's activities through portfolios and online portals
- Communicate with you via letters, emails, SMS, online portals, electronic sign in/out, surveys and other communication channels
- Undertake or participate in early childhood education and care research projects with families, children and partners
- Develop and deliver our curriculum and educator training programs
- Support work experience, vocational education and university students who undertake practicum placements at our centres
- Promote and market C&K, including using social media
- Recruit appropriately qualified staff members
- Comply with our legal obligations, including making disclosures required or authorized by law, a court or tribunal, and government authorities
- Manage complaints and internal reviews and investigations
- Manage our risks
- Develop C&K's business and products
- Communicate with service providers to provide our services to you (including, for example, our website server hosts and our insurance providers)
- Third party service providers we engage for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, debt collectors and payment systems operators
- Submit Australian VET Management Information Statistical Standard compliant data to the National VET Provider Collection in accordance with the NVETR Act
- Develop and improve the College's activities
- Identify potential employees from students studying at the College.

## How we collect your personal information

We try to only collect the personal information we need to achieve Our Purpose. The main way we collect information about you is when you give it to us. What information we collect and how we collect it is set out in the table attached to this Policy.

We will notify you when we are collecting your personal information. We will obtain your express consent to collecting sensitive information. If you don't want us to use your information you can tell us at the time it is collected or as soon as possible afterwards.

If you do not want C&K to collect and use your personal information we may not be able to provide services to or assist you.

## How we disclose your personal information

We will not use or disclose personal information for any other reason except to achieve Our Purpose and undertake our activities unless:

- you have consented
- you would reasonably expect us to use or disclose the information for another purpose which is directly related to Our Purpose or
- we are required or authorised by law and/or under the Privacy Act.

## How we store and protect your personal information

Most of the information we hold about you will be stored electronically. We take reasonable steps to protect your personal information as far as practicable by:

- storing information on secure servers or locations accessible only to persons authorised by C&K
- all employees regularly completing privacy training
- appropriately destroying personal information no longer required
- conducting internal assessments to determine privacy requirements and compliance with our security measures
- requiring our service providers to only use or disclose the information for the purpose of the service.

Unfortunately, no electronic system is guaranteed to be 100% secure. If a data breach occurs we will take the necessary steps under the Privacy Act to mitigate the risk of damage and, as required, notify you and the Privacy Commissioner.

## Overseas data storage

Some of the service providers that we use to run our business may store data in the United States of America and other overseas countries including the EU, Ireland, Switzerland, Canada, Germany, Singapore and New Zealand. C&K takes all reasonable steps to protect your personal information in accordance with the Privacy Act, including:

- assessing if the service provider is subject to a privacy regime that offers similar protection to Australia
- entering into contractual arrangements that require appropriate standards of privacy
- seeking the consent of individuals prior to transferring the information or

- as is otherwise permitted by law.

## How to access or correct your personal information

You have the right to:

- access the personal information we hold about you and
- ask that we correct that information.

To do so please contact our Privacy Officer (privacy@candk.asn.au). 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.

## How to make a complaint

If you believe that C&K has breached your privacy please contact C&K's Privacy Officer:

Email: privacy@candk.asn.au  
Post: C&K Privacy Officer  
257 Gympie Road  
Kedron QLD 4031

The Privacy Officer will:

- acknowledge your complaint within five business days
- Investigate your complaint
- endeavour to respond to you with the outcome of the investigation within 30 business days.

If you make an anonymous complaint we may not be able to properly investigate or respond to it.

When we review your complaint, we may need to contact the people you name and disclose to them your identity and the nature of your complaint. If you do not wish C&K to do so please let us know. However, this may limit our ability to properly investigate and resolve your complaint.

If you are dissatisfied with C&K's response or 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 <https://www.oaic.gov.au>.

## Amending this policy

We may change this policy at any time without prior notice. When we do make changes, we will notify you of them by posting an updated version of the policy on our website.

## What personal information we collect and how we collect it

How we collect your personal information and the type of personal information that we collect about you and your family will vary, depending on how we interact with you. This includes, but is not limited to:

### Enrolling your child at and attending a C&K centre

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>• Full name (of parents / guardian and child)</li> <li>• Address details</li> <li>• Date of birth (of parents / guardian and child)</li> <li>• Contact details (phone number, email)</li> <li>• Your child's authorised health contacts, emergency contacts, persons nominated to collect your child from our centre</li> <li>• Copies of identification documents, such as your child's birth certificate or passport</li> <li>• Financial information such bank account and credit card detail</li> <li>• Centrelink Customer Reference Number</li> <li>• Court orders, including custody arrangements</li> </ul>	C&K Website – online wait list application form Enrolment booklet – in writing and / or online (Kidsoft Childcare Management System)
<ul style="list-style-type: none"> <li>• Photographs, video images, artwork or pictures (you can tell us if you do not wish us to use these for marketing purposes when you complete the enrolment booklet)</li> </ul>	Children's portfolios (online through third party provider Storypark) Photographer
<ul style="list-style-type: none"> <li>• Statistical information provided to the Department of Education</li> </ul>	Online survey through third party provider
<ul style="list-style-type: none"> <li>• Providing feedback to C&amp;K</li> </ul>	Website or in writing
Sensitive Information	
<ul style="list-style-type: none"> <li>• Your child's nominated medical practitioner</li> <li>• 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 immunisation status and records</li> <li>• Religion, cultural background and language spoken at home</li> <li>• Any information relating to special requirements for a child's care (this may constitute sensitive information)</li> </ul>	C&K Website – online wait list application form Enrolment booklet – in writing and / or online (Kidsoft Childcare Management System)
<ul style="list-style-type: none"> <li>• Biometric scanning information if you log into a centre using a keypad</li> </ul>	Online
<ul style="list-style-type: none"> <li>• Health or medical information about your child's additional needs (for example when applying for additional needs funding)</li> <li>• COVID-19 Test Results / Positive Case Confirmation (if required)</li> </ul>	In writing and / or online

## Students, Volunteers and External Contractors

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Name</li> <li>Email Address</li> <li>Contact Number</li> <li>Blue card type</li> <li>Blue card number</li> <li>Blue card expiry date</li> <li>Referee Name</li> <li>Referee Position / Relationship</li> <li>Referee Contact Details</li> <li>Student, Volunteer /External Contractor Signature</li> <li>COVID-19 Test Results / Positive Case Confirmation (if required)</li> </ul>	In writing and / or online
<ul style="list-style-type: none"> <li>Identification document eg drivers licence, passport</li> <li>Blue Card (or similar)</li> <li>COVID-19 Vaccination Status and Evidence Sighted</li> </ul>	Photocopy or electronic / digital image

## C&K Open Week Event (Families)

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Parent / guardian name</li> <li>Child's name</li> <li>Child's Date of Birth</li> <li>Email Address</li> <li>Postcode</li> <li>Contact Number</li> <li>COVID-19 Test Results / Positive Case Confirmation (if required)</li> </ul>	In writing and / or online
<ul style="list-style-type: none"> <li>Photograph or video of you participating in the event</li> <li>COVID-19 Vaccination Status and Evidence Sighted</li> </ul>	Electronic / digital Image

## C&K Focus Group (external participants)

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Name</li> <li>Postcode</li> <li>Email address</li> <li>Age</li> <li>Whether you have children or not</li> <li>Ages of children</li> <li>If you use a C&amp;K service</li> <li>Marital status</li> <li>Gender</li> <li>COVID-19 Test Results / Positive Case Confirmation (if required)</li> </ul>	In writing and / or online
<ul style="list-style-type: none"> <li>COVID-19 Vaccination Status and Evidence Sighted</li> </ul>	Electronic / digital Image

### Attending a C&K Event

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Parent / guardian name</li> <li>Child name</li> <li>Address</li> <li>Date of birth</li> <li>Email address</li> <li>Address</li> <li>Contact Number</li> <li>COVID-19 Test Results / Positive Case Confirmation (if required)</li> </ul>	In writing and / or online
<ul style="list-style-type: none"> <li>Photograph or video of you participating in the event</li> <li>COVID-19 Vaccination Status and Evidence Sighted</li> </ul>	Electronic / digital image

### Visiting C&K's website and participating in C&K's social media

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Name (if provided)</li> <li>Address (if provided)</li> <li>Date of birth (if provided)</li> <li>Email (if provided)</li> <li>Contact number (if provided)</li> <li>Social media handle</li> <li>Details about your computer</li> </ul>	<a href="http://www.candk.asn.au">www.candk.asn.au</a> Facebook Twitter Instagram  Cookies Web analytics
<ul style="list-style-type: none"> <li>Images</li> </ul>	When you upload images to C&K's social media accounts such as facebook

#### **Web analytics and tracking**

We use software such as (but not limited to) Google Analytics and Crazy Egg to collect data about your interaction with our website.

The sole purpose of collecting this data is to improve your experience when using our site.

Examples of the types of data we collect with these tools include:

- your device's IP address
- device screen size
- device type, operating system and browser information
- sessions
- page views
- conversions
- bounce rate
- session duration
- geographic location (city)
- referring domain and out link if applicable
- search terms and pages visited on our website
- date and time when pages were accessed on our website
- heat mapping to improve functionality

#### **Cookies**

Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website. Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please amend your browser preferences before accessing the C&K website.



## Applying for employment with C&K

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Date of birth</li> <li>Email</li> <li>Contact number</li> <li>Documents setting out your employment history (such as a resume or CV)</li> <li>Name and contact details of your personal referees</li> <li>COVID-19 Test Results / Positive Case Confirmation (if required)</li> </ul>	In writing and / or online (Page Up)
Sensitive Information	
<ul style="list-style-type: none"> <li>Religion, cultural background and language spoken at home</li> <li>COVID-19 Vaccination Status and Evidence Sighted</li> </ul>	In writing and / or online (Page Up) Electronic / digital image

## Enrolling and studying at the C&K College of Early Childhood

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Date of birth</li> <li>Gender</li> <li>Place of birth</li> <li>Email</li> <li>Contact numbers</li> <li>Emergency contact names, contact numbers and relationship to you</li> <li>Previous or current schooling</li> <li>Employment status</li> <li>Employment information including employer's name, your position and your supervisor's name</li> <li>Learner Unique Identifier</li> <li>Unique Student Identifier</li> <li>Driver's Licence</li> <li>Birth Certificate</li> <li>Passport</li> <li>Immicard</li> <li>Citizenship Certificate</li> <li>Certificate of Registration by Descent</li> <li>Financial information such as tax file numbers, bank account and credit card details</li> <li>FEE Help Status</li> <li>Your signature</li> <li>A parent/guardian's signature if you are under 18</li> <li>COVID-19 Test Results / Positive Case Confirmation (if required)</li> </ul>	Enrolment booklet – in writing
Sensitive Information	
<ul style="list-style-type: none"> <li>Religion, cultural background and language spoken at home</li> <li>Medicare Card</li> <li>Disabilities and assistance requirements</li> <li>COVID-19 Vaccination Status and Evidence Sighted</li> </ul>	Enrolment booklet – in writing Electronic / digital image

## Providing feedback or making a complaint to C&K

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Email address</li> <li>Contact Number</li> <li>Details of your complaint which may include reference to personal or sensitive information that you provide to us</li> </ul>	In writing or via website online form

## Providing a service to or entering into a contract or tender with C&K

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Email address</li> <li>Contact Number</li> <li>Financial information such as bank account details</li> <li>COVID-19 Vaccination Status and Evidence Sighted (if required)</li> </ul>	In writing or via email Electronic / digital image

## Hiring a C&K venue

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Email address</li> <li>Contact Number</li> <li>Financial information such as bank account or credit card details</li> </ul>	In writing or via email

## Entering a C&K premise that uses Closed Circuit Televisions for security monitoring

Information Collected	How it is collected
<ul style="list-style-type: none"> <li>Your image</li> <li>Audio record of your voice</li> </ul>	Closed Circuit Television recording