



Privacy Policy (Website)

Policy number	QA7GL1	Version	2.0
Drafted by	J. Klaric	Approved by Committee on	July 2019
Responsible person	S. Garbett	Reviewed	Jan 2024

Purpose of the policy

Thank you for visiting bayswaterchildcare.com.au. We respect and protect the privacy of our users, and this privacy policy tells you how we collect and use personal information.

We comply with the *Privacy Act 1988* (Cth) (Privacy Act) and handle personal information that we collect following the Australian Privacy Principles (APPs). The Privacy Act and the APPs apply to all our childcare centres and services.

BCCA collects and holds personal information about you or your child (that is, information relating to an individual or which can be used to identify an individual) that is reasonably necessary for or related to our activities and the services we provide.

The purposes for which your personal information is collected will usually be obvious at the time it is collected. BCCA collects the personal information of parents and guardians, children, employees and stakeholders for the primary purpose of providing early childhood education and care services.

BCCA will only use your personal information for the purpose it was collected or a reasonably expected or related secondary purpose.

Kinds of Information Collected

Personal information BCCA collects may include your name, gender, address, phone number, email address, Date of birth, bank account details, credit card number, tax file number, Centrelink Customer Reference Number, Date of birth (for CRN holder), occupation, custody arrangements or other information relevant to providing you with our services.

Additional specific information BCCA collects and holds about children may include their name, former name, gender, address, Centrelink Customer Reference Number, immunisation status, Date and place of birth, birth certificate, Medicare number, custody arrangements or parenting orders, dietary requirements, languages spoken, doctor's details, medical conditions, additional needs, photographs and videos of children, samples of children's work and general information about your child and your family that assists us in providing individualised early learning and care to children.

Method of Collection

Personal information will generally be collected from you directly through the use of our standard forms, over the Internet via our website, via email or written communication with you, or through a telephone conversation or meeting with you.

Photos and videos of children and children's work samples are collected at our respective centres. Names, addresses, and phone numbers of children's additional emergency contact people are collected from children's parents or guardians.

There may, on occasion, be instances where personal data about you will be collected indirectly because it is unreasonable or impractical to gather the information directly. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Failure to Provide Information

If you do not wish for your personal information to be collected, you should discuss this with a BCCA employee. BCCA employees will act strictly in accordance with this policy and will be happy to discuss the reasons for seeking to collect your personal information. They will also discuss any consequences of not providing your personal information or providing incomplete or inaccurate personal data, which may impact the services BCCA can provide.

Use of Personal Information

BCCA takes its obligations seriously when dealing with your personal information. BCCA will collect, hold, and use that personal information for purposes associated with providing early childhood education and care services; advocating for the well-being, protection and development of children; documenting children's learning; managing children's current or prospective enrolment; providing you with information about our organisation, services and activities via letters, email, SMS and other centre or organisation communication channels; and requesting information from you about our organisation and services via surveys.

Direct Marketing

If BCCA has collected your information directly from you and we believe you reasonably expect us to, we will use or disclose your personal information to communicate directly with you to promote our services. BCCA will allow you to easily opt out of receiving direct marketing messages and stop sending direct marketing communications if you ask us to.

Job Candidates

If you apply for a job with BCCA, we will collect and hold personal information about you relevant to your application for employment, including your name and contact details, curriculum vitae or resume, employment history, academic records, working with children and police checks, and comments made to BCCA or its agents about you by your referees. We will use reasonable endeavours to keep such information confidential, and if you do not commence employment with BCCA, we will destroy such records when no longer required. We reserve the right, however, to retain for our records any file notes or observations we make in interviews with you or your referees with respect to your qualifications and suitability for a role.

Sensitive Information

In some circumstances, BCCA may seek to collect sensitive personal information. Sensitive information may include your child's racial or ethnic origin or cultural or religious requirements. The Education And Care National Regulations also require us to collect and hold details of your child's medical conditions, immunisation history and additional needs. We collect this information as it is reasonably

necessary for ensuring the well-being, protection and development of children in our care. For example, staff may wish to develop an educational program referencing a child's country of origin.

BCCA will only collect your sensitive information with your consent and will ensure it is stored securely. If you do not wish for your sensitive information to be collected by BCCA, you should discuss this with a BCCA employee.

BCCA employees will act strictly in accordance with this policy and will be happy to discuss the reasons for seeking to collect your sensitive information. They will also discuss any consequences of not providing your sensitive information.

Disclosure

BCCA will only disclose your personal information for the purpose it was collected or a reasonably expected or related secondary purpose.

We may disclose personal information about you or your child to:

Third-party service providers who may assist us in operating our business (including credit reporting bodies, collection agencies, legal advisors and technology service providers). We will take reasonable steps to ensure these service providers do not breach the Australian Privacy Principles.

Child protection or family support agencies when we reasonably believe that a child is at risk of significant harm, as required by law.

BCCA will not otherwise disclose personal information to a third party for any other purpose without your consent unless it is authorised or required by law.

Access and Correction

You may request access to your personal information. Ordinarily, BCCA will require you to request access in writing directed to Management. BCCA employees other than Management cannot generally provide you with access.

If you believe BCCA's record of your personal information is incorrect, please let BCCA know. We will take reasonable steps to correct the information to be accurate, complete and up to Date.

In some circumstances which are prescribed by the Privacy Act, such as where doing so might put a person at risk of harm or have an unreasonable impact on the privacy of others, BCCA may decline access to personal information. If your access request is denied, BCCA will tell you why.

Internet

We may collect your personal information when you use and access our website in the form of your IP address or domain name.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and Date of your visit and the IP address assigned to your computer.

We may also use 'cookies' or similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that puts the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser, but our websites may not work as intended for you if you do so.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites, and any linked websites are not subject to our privacy policies and procedures.

Information Storage and Security

Personal information collected by BCCA will be stored securely in paper form or electronically at a BCCA centre. BCCA may store, process or back up your personal information on computer servers that are located overseas, including through third-party service providers who assist us in operating our business. Only authorised employees from BCCA and third-party service providers will have access to your information, and this access will be structured in such a way as to ensure the use and disclosure as stated above. We will take reasonable steps to protect any personal information we hold from unauthorised access, modification, misuse, loss and disclosure.

Data breaches

The Privacy Act requires us to notify affected individuals and the Australian Privacy Commissioner about 'eligible data breaches'. An eligible data breach occurs when the following criteria are met:

There is unauthorised access to or disclosure of personal information we hold (or information is lost in circumstances where unauthorised access or disclosure is likely to occur);

The access, disclosure or loss is likely to result in serious harm to any of the individuals to whom the information relates; and

We are unable to prevent the likely risk of serious harm with remedial action.

If it is not clear whether a suspected data breach meets these criteria, we will investigate and assess the breach to determine whether the breach is an 'eligible data breach' that requires us to notify the affected individuals. This is to ensure that you are notified if your personal information is involved in a data breach likely to result in serious harm. Even if the criteria are not met, we may decide it is appropriate to notify you as part of our commitment to taking privacy seriously.

Amendments to this Privacy Statement

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

Privacy Act 1998 (Cth)

This notice is provided for your information and is not intended to limit or exclude your rights under the Privacy Act 1998 (Cth).

Complaints and Feedback

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, please contact us as set out below, and we will take reasonable steps to investigate the complaint and respond to you. If you are unhappy with our response, you may complain directly to the Australian Information Commissioner.

If you have any queries or concerns about our privacy policy or how we handle your personal information, please contact the Compliance Manager.

Email address: compliance@bayswaterchildcare.com.au

Telephone: 92751268

More information

For more information about privacy in general, you can visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au