



# PRIVACY POLICY

## DESCRIPTION OF POLICY

Early Learners Hub recognises and respects the importance of privacy and confidentiality as an individual right and a basis for building partnerships. Our centres require personal information from Families to provide appropriate and responsive care.

This policy has been developed to comply with the Australian Privacy Principles (APPs) (2014) and pursues the highest standard in the protection and preservation of privacy and confidentiality. Personal Information relates to any information or opinion, whether true or not, that identifies you.

## PURPOSE OF POLICY

This policy details requirements to maintain private and confidential files for Educators and staff, children and their Families, where we develop systems for the appropriate use, storage and disposal of records.

## PRIVACY POLICY

Early Learners Hub values your privacy.

Protecting your privacy and keeping your personal and sensitive information confidential is important to Early Learners Hub.

This Privacy Policy relates to personal information we handle about our parents, our children, our visitors and other members of the public. In this Privacy Policy, we use the terms, "we", "us", "our" or "Early Learners Hub", to refer to this service and any related body corporate.

Personal information means information or an opinion that identifies you, or could reasonably identify you as an individual, whether the information or opinion is true or not.

Some personal information is considered 'sensitive information' under the Privacy Act 1988 (Cth) (Privacy Act). Sensitive information can include information like your membership of a professional or trade association, religion, marital status or sexual preference.

## PRIVACY STATEMENT

Early Learners Hub and its related entities, collect, disclose and use your personal information to assist us in providing effective early childhood education and care.



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Apart from the information that you provide us, we may collect personal information that is available from public sources or from third parties that provide us with marketing information.

Due to the nature of our service, we may be required to provide your personal information to government agencies, our related companies and to people that we outsource functions to, for example, educational program support services or payment processing agencies.

If you choose not to provide some or all of the personal information we require, it may affect our ability to provide care.

You can ask us not to use your information to promote our services by following the procedure outlined in this Privacy Policy which contains information on how:

- a) To update your preferences about the marketing and promotional material we send to you;
- b) To request access to and seek correction of the personal information we hold about you;
- c) To make a privacy complaint

The Early Learners Hub Privacy Officer will assist you with any complaint, access or correction.

## COLLECTING AND HOLDING PERSONAL INFORMATION

We only collect personal information that is necessary to operate our service.

The personal information that we collect about you and your Family includes your name, postal and street address, email address, telephone number, gender, age, profession/role, place of work, emergency contact details, any special needs or preference of your child, information relating to any complaints you have made to us about our services and any information we are required to maintain to satisfy government regulatory requirements.

We also collect your payment information, such as your credit card or direct debit information.

In certain circumstances we may collect sensitive information about you, such as any religious or cultural observances or any special health or developmental needs we should be aware of.

The Privacy Act regulates the collection and handling of sensitive information as well. We are able to collect that information if you voluntarily give it to us or if you otherwise consent to us collecting it. We will only collect sensitive information about you or your child if you provide us with sensitive information, this will constitute your consent.



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It is important to understand that most of the information we request is for compliance with government regulation and if this information is not provided, we may not be able to provide you with service.

We typically hold the personal information that we collect either on electronic databases or as hard copy documents in personal files. All information is secured with access only being permitted to people at the service that have a need to access it or our Enrolments Team.

## METHODS OF COLLECTING PERSONAL INFORMATION

We collect personal information that you provide to us through:

- a) Expressing interest through putting your details on our waiting list;
- b) Enrolling your child/ren in our service;
- c) Processing Child Care Subsidy payments;
- d) Bank and other transaction activities you authorise us to conduct;
- e) Complaints made by you with us;
- f) Court orders you ask us, or we are required to observe;
- g) Emergency contact (NOTE: Emergency contacts must also personally consent to their private information being kept by our service.)
- h) Information collected by our website;
- i) Information you provide to our consultants;
- j) Provided to us by our consultants;
- k) Competition entry forms;
- l) Bookings for training and events;
- m) Release forms and testimonials;
- n) Parent surveys;
- o) When you register for newsletters; and
- p) when you provide material to us to enable us to provide or improve our services to you.

We may also collect personal information about you:

- a) from our third-party joint initiative partners;
- b) that is publicly available from sources such as social media websites; and
- c) from third parties that provide us with marketing leads.

## USE AND DISCLOSURE OF YOUR INFORMATION

We collect, hold, use and disclose personal information to:

- a) Fulfill our obligations to provide you with the services you have asked for;
- b) Assist third party educational or developmental specialists acting on your behalf;
- c) Perform transactions that you have authorised;



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- d) Keep you informed of relevant software and services that support your child's early education and development;
- e) Process Child Care Subsidy or other government support payments;
- f) To maintain a healthy and safe environment for your child/ren;
- g) Enable secure access to our websites;
- h) Participate in the process of any third-party acquisition or potential acquisition of an interest in us or our assets;
- i) Process your transaction details for bank feeds; and
- j) Fulfil any legal and regulatory obligations.

## SECURITY OF PERSONAL INFORMATION

All personal and sensitive information in electronic form is kept in secure data bases that can only be accessed by staff who have the delegated authority to do so.

Documentation that may be provided to the service at any time is kept in locked filing cabinets with key access. Such access can only be gained through the services approved provider.

If you are considering sending us any personal information by standard email, please be aware that the information may be less secure in transit. We are required by law to take steps to protect the security of personal information once it comes into our possession only.

The security measures that we put in place to protect your information are audited from time to time to ensure that the service observes best practice and is compliant with all applicable aspects of the Privacy Act.

## INFORMATION ACCESS AND CORRECTION

Subject to any exceptions under the Privacy Act, if you have provided us with personal information, you have a right to request to access or correct it. If you want to access or correct your personal information you should contact the office and put your request in writing.

Once you have made your request for access or correction, we will respond within a reasonable period. In some cases, we may ask you to pay an administrative fee to cover costs associated with your request for access. To assist us in responding to your request, please include as much detail as possible about the particular personal information that you are seeking to access or correct (in order to help us locate it) and, if applicable, how you would like to access the information.



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We will provide you with a copy of, or details of, your personal information wherever it is possible and practicable to do so. Otherwise, we will work with you to find a mutually agreed alternative.

If after exploring all options, we refuse to correct or give you access to your personal information, we will provide you with a written notice that sets out the reasons for the refusal (except where it would be unreasonable to do so), the mechanisms available to you to complain about the refusal and any other matters that the Privacy Act requires us to address.

## QUESTIONS, CONCERNS AND COMPLAINTS

If you want to make a complaint about a breach of your privacy by our service, you can contact us at the office during working hours. All complaints will be investigated by an appropriately qualified and senior representative however we may engage an external person to conduct the investigation independently.

We will endeavor to resolve your complaint as quickly as possible, and in any event within 30 days. If your complaint takes longer to resolve, we will keep you informed of our progress with the investigation including how we propose to resolve your complaint and what, if any, corrective measures will be put in place.

If you require further information about our privacy complaints handling process or the progress or outcome of any privacy complaint investigation, please contact the Privacy Officer through the office.

If you are not satisfied with our handling or resolution of your complaint, you can lodge a complaint with the Office of the Australian Information Commissioner ("OAIC"). For more information about making a complaint to the OAIC, visit <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

## CHANGES TO THIS POLICY

We may make changes to this Privacy Policy from time to time. We will make any changes available to all Families using our services. You can also obtain a copy of the most current Privacy Policy by either emailing or writing to the Privacy Officer at the service.



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## DOCUMENT INFORMATION

<b>Effective Date</b>	10 December 2020	
<b>Review Date</b>	10 December 2021	
<b>Sources and References</b>	Referenced Documents	N/A
	Associated Policies and Forms	N/A
	Related NQS Quality area	N/A
	Related Education and Care Services Regulations	N/A

<b>Date</b>	<b>Description of update</b>	<b>Owner</b>
10 December 2020	Creation of Policy	Early Learners Hub

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