PRIVACY POLICY

1 PURPOSE

This policy is to guide staff on the principles and practices established to safeguard the privacy of students, their family, staff and volunteers at Kinma. This policy demonstrates how Kinma collects, uses and discloses the personal information it collects.

2 POLICY STATEMENT

Kinma is committed to safeguarding the privacy of students, their families, staff and volunteers. The *Privacy Act 199*8 (Cth) (Privacy Act), Australian Privacy Principles and any relevant registered privacy codes govern the way Kinma manages personal information.

Kinma collects and holds personal information about students and their families that is necessary for or related to our activities and the services we provide. Kinma collects personal information of parents and guardians, students, employees and stakeholders for the primary purposes of

- providing early childhood and primary education
- advocating for the well-being, protection and development of children
- documenting student learning
- managing students' current or prospective enrolment
- providing families with information about our organisation, services and activities via letters, email, SMS and other centre or organisation communication channels, and
- requesting information from families about our organisation and services via surveys.

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

The purposes for which personal information is collected will generally be clear at the time of collection.

3 PRACTICE

3.1 Information collected

The kinds of personal information Kinma collects and holds may include :

- personal details - name, former names, gender, date of birth, birth certificate
- contact details - address, phone numbers, facsimile number, email address
- financial information - bank account details, credit card number, tax file number, Centrelink Customer Reference Number
- custody arrangements and parenting orders
- other information relevant to providing Kinma service, for example Working With Children Check status.

Government requires us also to collect education and employment data in relation to parents and guardians.

Additional specific information Kinma collects and holds about students may include:

- medical information - immunisation status, Medicare number, dietary requirements, doctor's details, medical conditions, additional needs
- languages spoken
- photographs and videos of students, samples of students' work and general information about students and their family that assists us in providing individualised early learning and care.

3.2 Method of Collection

Personal information will generally be collected directly through the use of standard forms, over the internet via our website, via email or written communication, or through a telephone conversation. Photos and videos of students and students' work samples are collected direct from students by staff. Name, address and phone numbers of children's additional emergency contact people are collected from children's parents or guardians.

3.3 Sensitive Information

In some circumstances Kinma may seek to collect personal information that is sensitive. This may include information such as a student's racial or ethnic origin or any cultural or religious requirements. We are also required by the *Education And Care National Regulations* 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 students.

Kinma will only collect your sensitive information with your consent and will ensure that it is stored securely. Parents should refer to *Section 3.4* (below) if they do not wish to provide sensitive information to Kinma.

3.4 Failure to Provide Information

A person who does not wish to provide personal information in accordance with this policy should discuss their concerns with the Kinma office staff. Kinma staff will discuss the reasons for seeking the information. They will also advise of any consequences that follow the failure to provide complete and accurate personal information. There are situations in which Kinma may not be able to enrol or continue the enrolment of a student in the absence of certain personal information.

3.5 Access and Correction

A person may request access to their personal information held by Kinma. Such requests should be in writing. Only the Head of School or Authorised Supervisor of preschool may provide you with access to your personal information.

If a person believes that the personal information Kinma holds is incorrect, they should inform the Head of School or the Authorised Supervisor (as appropriate). We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

In some circumstances prescribed by the *Privacy Act 1988*, such as where to do so might put a person at risk of harm or have an unreasonable impact on the privacy of others, Kinma may decline access to personal information. If your request for access is denied, Kinma will tell you why

3.6 Disclosure

Kinma will only disclose 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 child protection agencies or family support agencies when we reasonably believe that a child is at risk of significant harm, as required by Kinma's Child Protection Procedure.

Kinma may use and disclose student, parent or staff data including health or sensitive information with its data and communication services suppliers however Kinma takes reasonable steps to ensure that such service providers are bound by the Australian Privacy Principles and adopt reasonable security measures. Those data and communication service providers may be in Australia or offshore.

Kinma 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.

3.7 Direct Marketing

If Kinma has collected information directly and we believe you would expect us to, we will use or disclose your personal information to communicate directly with you to promote our services. Kinma will provide you with a way to easily opt out of receiving direct marketing messages and will stop sending direct marketing communications if you ask us to. Primary carers may not opt out of receiving direct communications from Kinma relating to school activities, events or news.

3.8 Studying with Kinma

Tertiary students undertaking a placement or practicum study with Kinma, must provide personal information with respect to their study. This information, that Kinma will retain, includes your name, address, contact details, employer, previous academic history and qualifications, work submitted by you for assessment and your assessment results. We will only use your information for purposes related to your study and will use reasonable endeavours to keep that information secure and confidential.

3.9 Job Candidates

People applying to work at Kinma must provide personal information relevant to their application for employment, including name and contact details, curriculum vitae or resume, employment history, academic records, *Working With Children Check* status and other police checks if requested. Kinma will also hold and comments made to Kinma 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 Kinma, we will destroy such records when no longer required in relation to your application. 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.

3.10 Internet

If you access Kinma's website, we may collect additional personal information about you in the form of your IP address or domain name. 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.

3.11 Information Storage and Security

Personal information collected by Kinma is stored securely in paper form and electronically.

3.12 Amendments to this Privacy Statement

Kinma 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 version of the policy on our website.
Privacy Act 1998 (Cth). This notice is provided for information and is not intended to limit or exclude rights under the *Privacy Act 1998* (Cth).

3.13 Complaints and Feedback

If a person wishes to make a complaint about a breach of the *Privacy Act 1988*, *Australian Privacy Principles* or a privacy code that applies to Kinma, they should contact us and we will take reasonable steps to investigate the complaint and respond to you. If you are not happy with our response, you may complain directly to the Australian Information Commissioner.

If you have any queries or concerns about our privacy policy or the way we handle your personal information, please contact our Head of School at:

Postal Address: 127 Coolowie Road, Terrey Hills NSW 2084
Email address: admin@kinma.nsw.edu.au
Telephone: 9450 0738

4 APPENDIX

4.1 Supporting Documents

- More information about privacy in general is available at the Australian Information Commissioner's website at **www.oaic.gov.au** .

4.2 Regulatory Legislation and Considerations

- E&CSNR 2011 Part 4.1; 4.3; 7.3.
- Childhood Association.
- National Education Standards –Safe and Supportive Environment (BOSTES)
- Kinma Vision 2018-2023 Objective 1 Education Excellence and Influence

4.3 Planning control

- Review by Head of School
- Distribute newsletter for feedback

4.4 Next Scheduled Review

- 2025

4.5 Version control

Version	Date Approved	Approved By	Brief Description
1.0	2009	Julie Carr, Manager	Creation new policy
2.0	June 2013	Education Committee	Staff update to refine practice
2.1	March 2015	Education Committee	Review of process in sharing inf.
3	September 2017	Manager	Changes to practice
3.1	September 2018	Julie Carr, Manager	Review for new template
3.2	Dec 2022	Ed. Committee	Amendment to legislation
3.3	Feb 2023	Ed. Committee	Review