



## PRIVACY POLICY

This Privacy Policy sets out how **ASCOLTA EARLY LEARNING & CARE PTY LTD (“ASCOLTA”)** collects, uses, discloses, and manages your personal information and how **ASCOLTA** complies with the Privacy Act 1988 (Cth) (“Privacy Act”).

This Policy is made available on our website [www.ascoltaelc.com.au](http://www.ascoltaelc.com.au) and you may also request a free copy in a different format via the contact details at the end of this policy.

### COMMITMENT

**ASCOLTA** is committed to promoting a culture and maintaining management systems that protect privacy and advocate for the well-being, protection, and development of children whilst complying with its obligations under the Privacy Act and Australian Privacy Principles (APP), to safeguard the privacy of our parents and guardians, children, employees, and stakeholders.

### COLLECTION OF PERSONAL INFORMATION

**ASCOLTA** collects personal information, from parents/guardians, job applicants, team members, visitors, and others that come into contact with the Company as part of ordinary business operations. As a result of this collection, we may obtain personal information about you and your child that is reasonably necessary for or related to our activities and the services we provide.

How we collect personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you. Where possible the Company uses specifically designed forms to standardise the collection of personal information. However, given the nature of our operations, we often also receive personal information by phone, email, letters, reports, etc. We may also collect personal information from other people or independent sources; however, we will only do so where it is not reasonable and practical to collect the information from you directly.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information”. Where we collect unsolicited information, we will only hold, use and/or disclose that information if we could have collected it by normal means. If that unsolicited information could not have been collected by normal means, then we will destroy, permanently delete or de-identify the information as appropriate.



The kinds of personal information we collect, and hold is largely dependent upon whose information we are collecting and why we are collecting it, however in general terms; but not limited to, we may collect:

- General Personal Information including names (including former), addresses and other contact details, date and place of birth, sex and/or gender, next of kin details, financial information, tax file number and/or other information relevant to providing you with services.
- Sensitive Information including nationality, country of birth, languages spoken at home, photographs and videos of children, custody arrangements, Centrelink Customer Reference Number, date of birth (for CRN holder), Medicare number, and medical/health information including medical conditions, dietary requirements, immunisation status and doctor's details, and general information about your child that assists us in providing individualised early learning and care to children.

### USE OF PERSONAL INFORMATION

**ASCOLTA** will only use or disclose personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our primary uses of personal information include but are not limited to:

- Providing early learning and childcare services.
- Satisfying our legal obligations, including our duty of care obligations.
- Assessing suitability for employment
- Helping us to improve our day-to-day operations including training our team; systems development; developing new programs and services; undertaking planning, research, and statistical analysis.

We may also use your information to provide you with information about other products or services offered by **ASCOLTA**.

We only collect sensitive information reasonably necessary for one or more of these functions or activities, if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety, or another permitted general situation (such as locating a missing person).



### INFORMATION SECURITY

Your personal information is treated as confidential information. We store personal information in a variety of formats including on databases, in hard copy files and on devices including laptop computers, and mobile phones. The security of this information is of importance to us, and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification, or disclosure.

These steps include:

- Maintaining up-to-date ITC management systems designed to protect personal information storage on our systems, including password management.
- Maintaining up-to-date management systems, training, and education designed to support this policy.
- Maintaining quality Work Processes and Instructions designed to ensure compliance with this policy.
- Restricting access to information to a need-to-know basis, with different levels of security being allocated to team members based on their roles, responsibilities, and security profile.
- Ensuring where sensitive information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms, with access in accordance with security access levels.
- Implementing physical security measures around Company facilities to prevent break-ins.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.
- Destroyed in a secure manner, deleted or de-identified as appropriate, information we hold that is no longer needed.

Our website may contain links to other websites. We do not share your personal information with those websites, and we are not responsible for their privacy practices. Please check their privacy policies.

### DISCLOSURE

**ASCOLTA** will only use personal information for the purposes for which it was given to us, or for purposes which are related (or directly related in the case of sensitive information) to one or more of our functions or activities.



**ASCOLTA** may disclose your personal information to government agencies, other Companies, our service providers, and other recipients from time to time, only if one or more of the following apply:

- You have consented.
- You would reasonably expect us to use or disclose your personal information in this way.
- We are authorised or required to do so by law.
- Disclosure will lessen or prevent a serious threat to the life, health, or safety of an individual or to public safety.
- Where another permitted general situation exception applies.
- Disclosure is reasonably necessary for a law enforcement related activity.

### PHOTOGRAPHY

**ASCOLTA** is committed to creating and maintaining a child safe environment where children are safe and feel safe, and their voices are heard about decisions that affect their lives. Child safety is embedded in our organisational leadership, governance, policies, procedures, and culture. Accordingly, Children have the right to be protected from the misuse of photographic and video images whilst at **ASCOLTA**.

Photographs recorded at **ASCOLTA** as part of a normal day are taken using an ASCOLTA owned electronic device and are only taken by members of the staff team, or by practicum students. To ensure the privacy of children and families is respected, **ASCOLTA** will only use photographs of children to support their learning and to record individual development progress with written authorisation from parents/guardians which is included in the enrolment form. You may change this authorisation at any time by notifying us in writing.

### PERSONAL INFORMATION QUALITY

**ASCOLTA** takes all reasonable steps to ensure the personal information we hold, use, and disclose is accurate, complete, and up to date. On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed. Please contact us if any of the details you have provided changes. You should also contact us if you believe that the information, we have about you is not accurate, complete, or up to date.

### ACCESS TO INFORMATION

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us. If you request access to your personal information held by **ASCOLTA**, we will, so far as possible, provide that information to you within two weeks of your formal request and on payment of any of **ASCOLTA'S** costs of retrieving and compiling that information.



If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly in writing and where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change, and we will attach this to your record.

### DECLINING PRODUCT OR SERVICE OFFERS (Opting-out)

From time-to-time **ASCOLTA** may wish to use your information to tell you about other products, services, or special offers that we think may be of interest to you. Please let us know if you do not want to receive these offers by contacting us using the contact details noted below or selecting the unsubscribe option in an email.

### COMPLAINTS

If you wish to make a privacy complaint you may do so by providing your written complaint by email or letter, to any one of our contact details as noted below. You may also make a complaint verbally.

We will respond to your complaint within a reasonable time (usually no longer than 30 days); however, we may seek further information from you in order to provide a full and complete response. Your complaint may also be taken to the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) either in the first instance, or if you feel **ASCOLTA** has not handled your complaint adequately.

### POLICY UPDATES

This Policy may change from time to time and the most current one is available on our website.

### CONTACT US

All correspondence and privacy related queries and concerns should be directed to the Privacy Officer at PO BOX 1311, Subiaco WA 6904, [admin@ascoltaelc.com.au](mailto:admin@ascoltaelc.com.au) or (08) 9388 8812.

### APPLICATION AND ENFORCEMENT

This policy applies to all our operations and team members, all of whom have a responsibility to implement and comply with this policy in their day-to-day operations. Through this we will ensure that we respect the privacy of all people. This policy shall be enforced by the Management Team at **ASCOLTA**.

Updated October 2023