



PRIVACY POLICY

Stepping Stone (SA) Childcare & Early Development Centres (Stepping Stone (SA)) is committed to protecting the privacy of your personal information and/or sensitive information. We have updated our privacy policy to ensure that we comply with the Australian Privacy Principles. We have set out below information about how we will manage your personal information and/or sensitive information.

We recommend that you read this policy carefully as it will assist you to make informed decisions about sharing your personal information and/or sensitive information with us.

By accessing our website and providing information to us you are consenting to the terms of this policy and agree to be bound by it.

Open and transparent management of your personal information and/or sensitive information (APP1)

Stepping Stone (SA) collects your personal information and/or sensitive information to provide you with access to the education and child care services you have requested and also to provide you with information about our services in which you may be interested. Stepping Stone (SA) may collect your personal information and/or sensitive information to comply with legal and regulatory requirements.

If the personal information and/or sensitive information requested by Stepping Stone (SA) is not provided by you we may not be able to provide you with the services, including providing your child with appropriate education and care.

Stepping Stone (SA) collects your personal information and/or sensitive information and stores that information electronically. The server is secure and cannot be accessed by unauthorised persons. Stepping Stone (SA) regularly changes passwords regarding access to the server and takes steps to ensure that the server is free from virus or unauthorised access.

We may also store paper copies of your personal information and/or sensitive information at the Centre attended by your child and/or at our head offices premises and/or at our secure warehouse premises.

We believe the system for storing information is secure. The information we collect from you may be information that enables us to identify you or your child. For example, the personal information and/or sensitive information could be you and your child(s) name, date of birth, email address, phone number, bank details, medical history or medical allergies, custody information, developmental information, etc.

Stepping Stone (SA) provides you with the option to create an account with an online private application called Storypark, supplied by Storypark Limited (NZ Company No.3603892). Storypark is designed to help teachers, parents and families work together to record, share and extend children's learning. If you provide your consent to Stepping Stone (SA) creating a profile for your child, and if you sign up or register to use the application, Stepping Stone (SA) will collect personal information about you and your child, including photographs and video recordings (in addition to the other types of information described above) in the course of Stepping Stone (SA)'s use of the Storypark application.

Stepping Stone (SA) may also provide your personal information and/or sensitive information to the following entities or people or organisations and for the following reasons:

- Various government agencies and departments as amended from time to time; such as ACECQA, Centrelink, FamiliesSA, Inclusive Directions, Gowrie, DECD, TAFESA, the Education Standards Board of South Australia, Department of Education and Training as well as hospitals, emergency medical providers, CCMS software provider, Storypark Limited, Guild Insurance (as amended from time to time) etc. to assist in providing education and care under legislated guidelines.

- Organisations and individuals that you have consented to your personal information and/or sensitive information being disclosed to.

Our privacy policy is provided to you free of charge and can be printed from our website www.steppingstonesa.com.au

If you consider that we have not appropriately stored or collected your personal information and/or sensitive information then you may make a complaint to our Privacy Officer by email info@steppingstonesa.com.au or telephone 08 8211 0200 at any time during business hours. Alternatively you may make a complaint to the Office of the Australian Information Commissioner via this link <http://www.oaic.gov.au/privacy/privacy-complaints> however we do request that you first provide us with an opportunity to address any concerns that you may have.

Anonymity and pseudonymity (APP2)

It is not practical and in most circumstances it will not be lawful for us to deal with individuals who have not identified themselves or used a pseudonym. Accordingly, to do business with us you must provide us with your personal information and/or sensitive information.

Collection of solicited personal information and/or sensitive information (APP3)

All personal information and/or sensitive information that we collect from you is collected because it is reasonably necessary for, or directly related to, one or more of our functions or activities. In most circumstances it is necessary for us to collect personal information and/or sensitive information from you in order to comply with the law. If you do not consent to the collection of your personal information and/or sensitive information in accordance with this policy then you must notify your Centre Director or our Privacy Officer immediately.

Dealing with unsolicited personal information and/or sensitive information (APP4)

If we receive information from you that is not solicited then we will within a reasonable period after receiving the information, determine whether or not the entity could have collected the information under APP3 if we had in fact solicited it from you.

If we determine that we could not have collected the personal information and/or sensitive information from you and the information is not contained in a Commonwealth record, then we will as soon as practicable ensure that the information is de-identified or deleted.

Notification of the collection of personal information and/or sensitive information (APP5)

By providing you with access to this policy we are notifying you that we may collect personal information and/or sensitive information about you and the reasons as to why we collect that information.

Use or disclosure of personal information and/or sensitive information (APP6)

We have set out in this policy the names of the entities and the types of organisations that we may share your personal information and/or sensitive information with for a secondary purpose. By reading this policy and providing us with your personal information and/or sensitive information you are consenting to us using and disclosing your information as outlined in this policy.

Direct Marketing (APP7)

We will not use your personal information and/or sensitive information for the purposes of direct marketing unless we have collected your information; and we consider that you would reasonably expect us to use or disclose the information for that purpose. If you do not wish to receive direct marketing information from us you may unsubscribe by contacting your Centre Director or our Privacy Officer.

If you request that we do not use your information for direct marketing then we will not do so.

Cross-border disclosure of personal information and/or sensitive information (APP8)

We do not disclose your personal information and/or sensitive information to any overseas recipient.

Adoption, use or disclosure of government related identifiers – APP9

We only use government related identifiers, such as your Customer Reference Number where the use or disclosure of the identifier is reasonably necessary for the purpose of carrying out the activities and functions related to the services provided by Stepping Stone (SA) and to comply with legal and regulatory requirements.

Quality of personal information and/or sensitive information (APP10)

We will take all reasonable steps to ensure that the personal information and/or sensitive information that we collect from you is accurate, up-to-date and complete.

Security of personal information and/or sensitive information (APP11)

We will take all reasonable steps to protect your personal information and/or sensitive information from misuse, interference and loss; and unauthorised access, modification or disclosure.

If we hold personal information and/or sensitive information about you and we no longer need that information for any purpose for which it may be used or disclosed and the information is not contained in a Commonwealth record; and we are not required by law to retain the information, then we will take reasonable steps to destroy the information or to ensure that it is de-identified.

Access to personal information and/or sensitive information (APP12)

You can gain access to your personal information and/or sensitive information held by us providing that the request to access to that information is not prohibited by law; or frivolous or vexatious; or poses a serious threat to the life, health or safety of any individual or to public health or safety; or if giving access to that information would have an unreasonable impact on the privacy of other individuals; or if the information relates to existing or anticipated legal proceedings between us and you and would not be accessible by the process of discovery in those proceedings; or giving access would reveal our intentions in relation to negotiations with you in such a way that it would prejudice those negotiations.

We can be contacted on (08) 8211 0200 or by writing to the Privacy Officer, Stepping Stone (SA), 209 Magill Road, Maylands SA 5069 or by email to info@steppingstonesa.com.au.

We will respond to your request within a reasonable period after the request is made. In some circumstances a reasonable charge may be made to enable us to comply with your request for information.

We will advise you in advance of that charge if one will be incurred.

If we refuse to provide you with access to your personal information and/or sensitive information, we will provide you with reasons in writing.

Correction of personal information and/or sensitive information (APP13)

If we hold personal information and/or sensitive information about you and we consider the information is inaccurate or you request that we correct the information, we will take all reasonable steps to correct that information having regard to the purpose for which it is held to ensure that the information is accurate, up-to-date, complete, relevant and not misleading.

If we refuse to update your personal information and/or sensitive information we will provide you with written notice as to why and the manner by which you can complain about the refusal.

We will respond to your request to correct your personal information and/or sensitive information within a reasonable period after the request is made.

Appendix

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not; and
- b. whether the information or opinion is recorded in a material form or not.

Sensitive information means

- a. information or an opinion about an individual's:
 - i. racial or ethnic origin; or
 - ii. political opinions; or
 - iii. membership of a political association; or
 - iv. religious beliefs or affiliations; or
 - v. philosophical beliefs; or
 - vi. membership of a professional or trade association; or
 - vii. membership of a trade union; or
 - viii. sexual orientation or practices; or
 - ix. criminal record;that is also personal information and/or sensitive information; or
- b. health information about an individual; or
- c. genetic information about an individual that is not otherwise health information; or
- d. biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- e. biometric templates.