PRIVACY AND CONFIDENTIALITY POLICY

Updated: November 2026

What are we talking about in this document?	This policy is related to privacy, confidentiality, security and Australian Privacy Principles and applies to all Keiki Early Learning services and entities.
Who is this for?	This policy applies to children, families, staff, management, students, and visitors of the service.
Why do we need this policy?	This policy supports Keiki Early Learning's compliance with regulations 168(2)(l), 170, 181 and 183 of the Education and Care Services National Law Regulations (WA). We protect the privacy and confidentiality of information and records relating to children, families, educators, staff and management by ensuring records are securely stored, appropriately disposed of, and only accessed or released to people with a legal right to the information.

Policy Contents

- The Important Stuff
- Responsibilities
  - Nominated Supervisor
  - Educators
- Australian Privacy Principles – Personal Information
  - Collection of Personal Information
  - Method of Collection
  - Purposes for Which Personal Information is Collected, Held, Used and Disclosed
  - Direct Marketing
  - Storage and Security of Your Personal Information
  - Access and Correction of Your Personal Information
  - Our Website
- Complaints
- Changes to this Policy
- Contact
- Guidelines
  - Devices, Images and Technology
  - CCTV and Phone Call Recording

Key Terms

Term	Meaning	Source
Australian Privacy Principles (APPs)	A set of principles under the Privacy Act that outline how personal information must be handled.	
Confidentiality	The obligation to protect personal and sensitive information from unauthorized access or disclosure.	
Digital Content	Includes photographs, videos, and recordings captured or stored by the service.	

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Disclosure	Disclosure means making personal information accessible to another person or organisation outside Keiki's effective control. Personal information will only be disclosed where authorised, permitted or required by law or otherwise in accordance with this Policy.	
Notifiable Data Breaches Scheme	A legal requirement to notify individuals and the Office of the Australian Information Commissioner if a data breach is likely to result in serious harm.	
Personal Information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether it is recorded in a material form or not.	
Privacy Act 1988	The Australian legislation that governs how personal information is collected, used, stored, and disclosed.	
Retention and Disposal	Guidelines for how long personal information is stored and how it is securely disposed of.	
Sensitive Information	A category of personal information that includes health information and information or opinions about matters such as a person's racial or ethnic origin, religious beliefs, sexual orientation or criminal record. Sensitive information generally attracts a higher level of privacy protection.	

The Important Stuff

This Policy applies to all Keiki Early Learning services and entities that make up the broader Keiki Early Learning group.
Under section 263 of the Education and Care Services National Law (WA), education and care services are subject to applicable Commonwealth privacy requirements. Keiki complies with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) contained in Schedule 1 of the Privacy Act. In order to comply with the Privacy Act, Services are required to follow the Australian Privacy Principles (APPs), which are contained in Schedule 1 of the Privacy Act. An overview of the APPs is attached as Appendix 1. For a detailed breakdown of the APPs click here.

The Notifiable Data Breaches (NDB) scheme requires Early Childhood Services, Family Day Care Services, and Out of School Hours Care Services to provide notice to the Office of the Australian Information Commissioner and affected individuals of any data breaches that are 'likely' to result in 'serious harm'. Where Keiki has reasonable grounds to suspect that an eligible data breach may have occurred, Keiki will undertake a reasonable and expeditious assessment in accordance with the Privacy Act 1988. Where the Notifiable Data Breaches Scheme requires notification, Keiki will notify the Office of the Australian Information Commissioner and affected individuals as required.

A breach of an Australian Privacy Principle is viewed as an '*interference with the privacy of an individual*' and can lead to regulatory action and penalties.

All staff members will maintain the confidentiality of personal and sensitive information and foster positive trusting relationships with families.

Responsibilities

The Nominated Supervisor (with the support of management) will

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- Ensure the Service acts in accordance with the requirements of the Australian Privacy Principles and *Privacy Act 1988* by developing, reviewing, and implementing procedures and practices that identify:
    - the name and contact details of the Service
    - what information the Service collects and the source of information
    - why the information is collected
    - who will have access to information
    - collection, storage, use, disclosure, and disposal of personal information collected by the Service
    - any law that requires the particular information to be collected
    - adequate and appropriate storage for personal information collected by the Service
    - protection of personal information from unauthorised access.
- Provide Staff and Educators with relevant information regarding changes to Australian privacy law and Service policy
- Ensure all relevant staff understand the requirements under Australia's privacy law and Notifiable Data Breaches (NDB) scheme
- Maintain currency with the Australian Privacy Principles (this may include delegating a staff member to oversee all privacy-related activities to ensure compliance).
- Ensure personal information is protected in accordance with our obligations under the *Privacy Act 1988* and *Privacy Amendments (Enhancing Privacy Protection) Act 2012*
- Ensure all records and documents are maintained, stored and disposed of in accordance with the Education and Care Services National Law Regulations (WA) and Keiki's Record Keeping and Retention Policy.
- Regularly back-up personal and sensitive data from computers to protect personal information collected
- Ensure all computers are protected with passwords and security software, and that passwords are not shared
- Ensure families are notified of the time particular records are required to be retained as per the Education and Care Services National Regulations [regulation 183 (2)].
- Ensure the appropriate and permitted use of images of children
- Ensure all employees, students, volunteers, and families are provided with a copy of this policy
- Deal with privacy complaints promptly and in a consistent manner, following the Service's *Grievance Policy* and procedures
- Ensure access to children's records is managed in accordance with the National Regulations, applicable privacy requirements, court orders and other legal requirements, and that personal information relating to another child, family, staff member or third party is not disclosed unless authorised, permitted or required by law.
- Ensure information given to educators will be treated with respect and in a professional and confidential manner
- Ensure individual child and staff files are stored securely, either in a secure digital format or in a locked and secure cabinet
- Ensure information relating to staff employment will remain confidential and available only to the people directly involved with making personnel decisions
- Ensure personal and sensitive information provided by families is treated confidentially and is only used or disclosed for the purpose for which it was collected, a related purpose where permitted, with appropriate consent, or where otherwise authorised, permitted or required by law.

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- Ensure themselves and staff adhere to the service's policies and procedures at all times
- Ensure educators, staff, volunteers, students and families are aware of the Privacy and Confidentiality Policy
- Ensure the service obtains written consent from parents/guardians of children who will be photographed or videoed by the service
- Ensure families only have access to the files and records of their own children
- Ensure that information given to educators will be treated with respect and in a confidential and professional manner
- Ensure only necessary information regarding the children's day-to-day health and wellbeing is given to non-primary contact educators; for example, food allergy information.
- Ensure they and their staff do not discuss individual children with people other than the family of that child, except for the purposes of curriculum planning or group management. Communication in other settings must be approved by the family beforehand.
- Refer all requests for children's records received from solicitors, Independent Children's Lawyers, courts, family consultants, experts or other parties involved in legal proceedings to Keiki Hub/management. Educators and service-level staff must not release records or provide written statements in response to these requests without authorisation from Keiki Hub/management.
- Ensure subpoenas, court orders and other legal demands for records are reviewed before disclosure to confirm their validity, scope, due date and the specific information required. Only information falling within the scope of the legal requirement will be produced.
- Ensure access to personal and sensitive information is limited to people who require access for their role or an authorised purpose, and that access is reviewed or removed when no longer required.
- Ensure Keiki collects, accesses, uses and discloses only the personal information reasonably necessary for the relevant purpose.

Educators and staff will

- Read the Privacy and Confidentiality Policy and adhere to it at all times.
- Ensure documented information and photographs of children are kept secure and that requests for access are managed in accordance with this Policy and the Technology and Cyber Security Policy, applicable legislation, court orders and the privacy rights of other individuals.
- Ensure families only have access to the files and records of their own children
- Treat private and confidential information with respect in a professional manner
- Not discuss individual children with people other than the family of that child, except for the purposes of curriculum planning or group management. Communication in other settings must be approved by the family beforehand
- Ensure that information shared with the service by the family is treated as confidential unless told otherwise
- Maintain and store individual and service information and documentation according to this policy at all times
- Not disclose confidential information about Keiki, its children, families, staff or management unless the disclosure is authorised by Keiki or is otherwise authorised, permitted or required by law.

Australian Privacy Principles – Personal Information

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Keiki Early Learning (**Keiki, us, we, our**) recognises the importance of your privacy. This policy (**Policy**) sets out how Keiki handles personal information and acknowledges Keiki's obligations under the applicable privacy laws, including the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**Privacy Laws**).

This policy is intended to provide a general overview of our policies for the handling of your personal information. Other policies may apply instead of or in addition to this Policy in certain circumstances.

Please note that in some circumstances, there are exemptions or exceptions to the Privacy laws that may apply to Keiki, including in relation to the handling of employment related personal information. Nothing in this Policy is intended to limit the operation of those exemptions or exceptions to Keiki or to otherwise restrict us from collecting and handling personal information in a manner that would otherwise be permitted by law.

By using our Website or otherwise providing personal information to us, you acknowledge that your personal information will be handled as described in this Policy and as otherwise authorised, permitted or required by law.

Collection of Personal Information

Keiki operates early learning centres and provides childcare and outside school hours care services. As part of providing our services, we may collect personal information that we require for the purposes of operating and managing our business activities and functions and as required or permitted by law. We may also collect personal information from you in connection with other dealings you may have with us, such as if you make a general enquiry with us, sign up to our news releases, attend a workshop or event run by us or apply for a position with Keiki.

We collect personal information about the children who attend our services as well as personal information about their parents and guardians, next of kin and other contacts.

The type of information we collect will depend on your dealings with us. It may include:

a) your contact details (i.e. your name, address, email and phone number);
b) details about your child including their name, age, gender, emergency contacts, custody arrangement (if applicable) and any further information we require to provide our services, which may include sensitive information relating to your child's cultural background, religion, and health information such as details of your child's immunisation status, allergies, dietary requirements, medical conditions, medication requirements and Medicare number;
c) information about your payment details for our services including bank account or credit card numbers;
d) information about parents, emergency contacts and other authorised persons who may collect children from our care including their driver's licence details;
e) photographs and images of children who attend our service;
f) Centrelink customer reference numbers and information about your Centrelink entitlements;
g) information about your use of the services that we supply such as attendance records, pick up logs, injury and incident reports and other related information; and
h) statistical information regarding the use of Keiki's Website, including the domains from which website users visit, IP addresses, the dates and times of visits, activities undertaken on our website and other clickstream data (though in many cases this type of statistical information may not include personal information).

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We may also collect personal information about the contractors, suppliers and employees that we engage, and deal with in relation to the provision of our services.
The type of information we collect will depend on your dealings with us. It may include:

a) your contact details (i.e. your name, address, email and phone number);
b) tax, superannuation and banking information and working contract;
c) medical details, including immunisation, medical history;
d) working history and qualifications, including resume, educational qualifications, Working with Children Check verification, First Aid Qualifications, Child Protection Qualifications, Food Safety Qualification and professional development certifications;
e) aptitude, psychological and medical testing, human resources management activities and conducting screening checks as permitted or required by law; and
f) emergency contact information.

If you send us an application for employment with us, this information will be used to assess your application. As part of the application process, you may be asked for your specific consent to the use and disclosure of certain personal information about any pre-employment medical examination or any aptitude or psychological testing. We may also ask you to consent to the disclosure of your personal information to those people who you nominated to provide references. A refusal to provide any of this information, or to consent to its proposed disclosure may affect the success of the application.

From time to time, we may collect sensitive information about you. We collect sensitive information when you provide it to us, with your consent or where otherwise permitted by law.
We may collect your personal information in a variety of ways, such as in person, by telephone, by email and by other electronic means (such as through our portals at the time of enrolment). Where practicable, we collect your personal information directly from you. From time to time, we may collect personal information about you from third parties (for example, from publicly available sources, our agents, our clients or contractors, and from other third parties such as other contractors engaged by our clients).
If you provide us with personal information about a third party, you represent, and we collect it on the basis that, you have that person's consent for us to collect and handle their personal information in accordance with this Policy.
If we are unable to collect the personal information we require, or the information provided is incorrect or incomplete, this may affect our ability to provide our services to you or the information you seek from us. Keiki will only collect personal information that is reasonably necessary for its functions or activities, or where collection is otherwise authorised or required by law. Where sensitive information is collected, Keiki will obtain consent where required or rely on another lawful basis for collection.

Purposes for Which Personal Information is Collected, Held, Used and Disclosed

We generally use and disclose your personal information for the purposes for which we collected it as described above, and for other related purposes that you would reasonably expect. Generally, these purposes include:

a) providing our early learning, childcare and outside school hours care services;
b) establishing and maintaining user accounts with third party providers, such as third party applications used to manage children's attendance at our services;
c) responding to your enquiries;
d) handling payments and refunds;
e) providing you with marketing information or updates about our services;

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f) obtaining your feedback on your experiences with us and conducting marketing and other promotional activities;
g) complying with our reporting and notification requirements to regulatory and enforcement bodies;
h) running workshops and events for members of enrolled families and community members;
i) for our general business operations (for example, maintenance of our business records, compliance with our legal and insurance obligations, for performance reporting, research, services development and planning and statistical purposes); and
j) as otherwise permitted or required by law.

We are required to collect some personal information by law. For example, under the Education and Care Services National Law (WA) and Education and Care Services National Law Regulations (WA) we are required to collect and maintain information about attendance and enrolment details about children enrolled in our service such as information relating to dietary conditions, medical conditions and immunisation status. We may also be required to collect or disclose personal information by other laws in some circumstances. For example, under the Public Health Act 2016 (WA) we may be required by law to disclose information relating to a child's health (including immunisation status) to particular governmental bodies. We may also share information about your and/or your child to departments such as the Police, child protection bodies or the Education and Care Regulatory Unit as required under law and our legal obligation or duty of care.

We may disclose and exchange your personal information with our related entities, to our clients, contractors, service providers, family services and other regulatory authorities and/or promotion partners for the purposes set out above and as otherwise permitted by the Privacy Laws. For example, the sharing of your personal information with organisations that carry out functions on our behalf (such as our platform providers including Xplor, Elmo, our accountants, payroll providers, accounts providers and advisors).
Keiki will take reasonable steps when selecting and managing third-party providers that handle personal information, including considering the provider's privacy, security, access, data hosting, retention, deletion and data-breach arrangements. Access to personal information will be limited to what is reasonably necessary for the services being provided.

Some service providers used by Keiki may store, process or permit access to personal information from locations outside Australia. Where Keiki discloses personal information to an overseas recipient, Keiki will manage the disclosure in accordance with applicable privacy requirements. Where practicable, information about countries in which overseas recipients are likely to be located will be made available to affected individuals.
In addition, if we are considering selling our business, or any part of our operations or assets then, we may disclose your personal information to a purchaser (or potential purchaser) in connection with that process or sale.

Direct Marketing

Like most businesses, we may use personal information we hold about you, to send marketing information to you. Generally, we only do so where you consent or where permitted by the applicable laws.
Our communications to you may be sent in various forms such as by post and by electronic means (including e-mail and SMS).
If you wish to cease receiving this information, please contact us directly on the contact details listed in the section below asking to be removed from our mailing lists, or use the unsubscribe facilities included in our marketing communications.

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Storage and Security of Your Personal Information

We may hold your personal information in electronic formats and in hard copy. We take reasonable steps to protect the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. This includes the use of physical, technical and administrative safeguards such as secure storage systems, access controls and staff training.

We also take reasonable steps to ensure that the personal information we hold is accurate, up to date and complete.

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, to comply with legal and regulatory obligations, and for legitimate business purposes such as insurance, governance and dispute resolution. Retention periods are determined in accordance with applicable laws and our Record Keeping and Retention Policy. Personal information may also be retained in secure IT system back-up records.

Where personal information is no longer required to be retained, Keiki will take reasonable steps to securely destroy the information or de-identify it, subject to any legal, regulatory, insurance or record-retention requirement.

While we take reasonable steps to protect personal information, the transmission of information over the internet is not completely secure. We cannot guarantee the security of personal information transmitted to us online, and you provide information to us at your own risk.

Privacy Incidents and Data Breaches

Any actual or suspected loss, unauthorised access, disclosure, alteration or misuse of personal information must be reported immediately to the Nominated Supervisor and Keiki Hub. Where the Nominated Supervisor is unavailable, the matter must be reported directly to Keiki Hub.

Keiki will take reasonable steps to contain and assess the incident, protect affected information and individuals, preserve relevant evidence and take appropriate remedial action. Where required, Keiki will assess whether the incident constitutes an eligible data breach under the Notifiable Data Breaches Scheme and notify affected individuals, the Office of the Australian Information Commissioner and/or other relevant authorities as required by law.

Privacy and data-breach incidents will be documented and reviewed to identify any required corrective action or improvements to Keiki's systems and practices.

Access and Correction of Your Personal Information

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading, in which case please contact the Centre Coordinator of your service or our Privacy Officer via the contact details listed below.

You may also request that we provide you with access to the personal information we hold about you by contacting us via the contact details listed below. Generally, we will provide you with access, except in limited circumstances where the law permits us to refuse, or prevents us from give you, access to the personal information we hold about you. Where we agree to provide you with access to your personal information, we may make this conditional on us

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recovering our reasonable costs of doing so. No fee will be incurred for requesting access, but if your request for access is accepted, you will be notified of any fee payable for providing access if you proceed with your request.

Personal information that we hold about you is not divulged or communicated through direct or indirect means to another person other than:

- To the extent necessary for the education and care or medical treatment of the child to whom the information relates,
- To a parent of the child to whom the information relates, except in the case of information kept in a staff record,
- To the Regulatory Authority, child protection authorities, police, emergency services or another government or regulatory body where the disclosure is authorised, permitted or required by law,
- As expressly authorised, permitted or required to be given by or under any Act or law,
- With the written consent of the person who provided the information,
- To a third-party provider that is required for the provision of education and care,

Disclosure of Children's Information and Family Law Matters

Information relating to a child will only be accessed or disclosed in accordance with applicable legislation, court orders and this policy. Keiki will take reasonable steps to verify the identity and authority of a person requesting access before releasing information.

Where parents are separated or involved in family law proceedings, Keiki will:

- review any parenting orders, Family Court orders or other relevant legal documents held by the service before releasing information
- comply with any applicable restriction or direction contained within a court order
- consider each parent's legal entitlement to access the child's records in accordance with applicable legislation
- protect the personal information of the other parent, authorised nominees and third parties contained within the child's records
- not release financial information, Child Care Subsidy information or another person's personal information unless authorised by that person or permitted or required by law
- refer any uncertainty, disputed request or request associated with legal proceedings to Keiki Hub/management before information is released.

A request by a solicitor, Independent Children's Lawyer or other person involved in family law proceedings does not, of itself, authorise disclosure of the child's confidential records. Where appropriate consent or another lawful authority for disclosure is not established, Keiki will require a valid subpoena, court order or other legally enforceable requirement before releasing the information.

Requests for Children's Information by External Parties

Keiki Early Learning will protect the privacy and confidentiality of children's records and will not release a child's information or records to an external party solely because that party has requested the information or is involved in legal or family law proceedings.

Requests from solicitors, legal representatives, Independent Children's Lawyers (ICLs), family consultants, experts or other external parties do not, by themselves, authorise Keiki to release a child's records. Information will only be released where:

- the appropriate person has provided written consent to the disclosure;

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- Keiki is served with a valid subpoena, court order or other legally enforceable requirement requiring or authorising disclosure; or
- the disclosure is otherwise expressly authorised, permitted or required by law.

Where information is sought for Family Court proceedings and appropriate written consent has not been provided, Keiki will ordinarily require a valid subpoena or court order before releasing the child's records. All subpoenas, court orders and other formal legal requests must be referred to Keiki Hub/management before any information is released.

The appointment of an Independent Children's Lawyer, or receipt of a request from a solicitor or other legal representative, does not of itself authorise Keiki to disclose confidential child records. Information may be released where Keiki has received valid written consent or authorisation from the person legally authorised to provide that consent, or where disclosure is otherwise authorised, permitted or required by law. Where an appropriate authority for disclosure has not been established, the requesting party will be advised to obtain a subpoena or court order. All requests associated with legal or family law proceedings must be referred to Keiki Hub/management before information is released.

Before information is released, Keiki will take reasonable steps to confirm the identity and authority of the requesting person and to ensure the disclosure is limited to information authorised or required to be provided. Records will be reviewed for personal information relating to other children, families, authorised nominees, staff or third parties and, where appropriate and legally permissible, that information will be redacted or withheld.

Our Website

Our Website may use cookies and similar technologies in some circumstances. Cookies help us enhance your experience, support website functionality and understand how our website is used. Cookies and related technologies may collect information about your interactions with our Website, which may in some circumstances constitute personal information.

We may also collect click-stream and related technical data when you use the Website, such as the date and time of your visit, the pages you accessed, your IP address, the type of browser and operating system you are using, and the websites you come from and navigate to. This information is used to analyse website usage, understand trends and improve our Website and services.

If you do not wish to receive cookies, you can configure your browser to refuse cookies. Please note this may affect the functionality of some parts of the Website.

Our Website may also contain links to third-party websites. These linked sites are not under our control and are not subject to this Policy. We are not responsible for the privacy, security or handling of your personal information on those websites. We encourage you to review the privacy policies and terms of use of any third-party sites you visit.

Complaints

If you have a complaint about how we handle your personal information, please contact us using the details below and provide as much information as possible to assist us in investigating your concern.

We will acknowledge receipt of your complaint and provide an estimated timeframe for our response. We aim to investigate and respond to complaints within 30 days.

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Where appropriate, we will take reasonable steps to address the issue and reduce the likelihood of it occurring again. Further information about our complaint handling process is available in our Grievance Policy.

If you are not satisfied with our response, you may also contact the Office of the Australian Information Commissioner (OAIC).

Changes to this Policy

Keiki reserves the right to amend, modify or replace this Policy from time to time subject to organisational needs and/or changes in the law.

Contact

If you have any enquiries or complaints about how we handle your personal information, or if you have any questions about this Privacy Policy, please contact us via the details listed below:

Attention: The Privacy Officer
Keiki Hub Pty Ltd ABN 20 643 223 232
45/57 Joondalup Drive
Edgewater WA 6027
Email: schools@keikiearlylearning.com.au
Telephone: + 61 8 9300 1330

Guidelines

Devices, Images and Technology

Photographs and videos are a valuable part of early childhood education, helping to foster a sense of belonging, support learning, and strengthen connections with families. They allow children to see themselves in action, spark meaningful conversations, and affirm that their experiences are recognised and valued.

At Keiki Early Learning, we are committed to upholding children's privacy and safety. We have comprehensive policies and expectations in place covering the use of digital devices, the storage, retention, and deletion of photographs and videos, the use of closed-circuit television (CCTV), remote access to Keiki systems, and cybersecurity protocols for children, families, staff, and visitors.

Children's images may only be captured, stored or transmitted using devices and systems permitted under the Education and Care Services National Law and Regulations and authorised by Keiki. Staff members, volunteers and students must not use or have a personal device in their possession while working directly with children, except where permitted under the Education and Care Services National Law (WA) or where a written authorisation or other applicable exception applies.

Children's images must not be captured, copied, stored or transmitted using personal devices, personal email accounts, personal cloud storage, unauthorised applications or personal social-media accounts. Images must only be taken or used for an appropriate and authorised purpose and in a way that maintains the child's dignity, privacy and safety.
Further requirements, including applicable exceptions and authorisations, are contained in Keiki's Technology and Cyber Security Policy.

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CCTV and Phone Call Recording

Keiki Early Learning has installed CCTV cameras at selected services for the sole purpose of building security. While some educators may have incidental visibility of live footage during recording in certain service areas, recorded footage is securely stored in an encrypted cloud environment and is not actively monitored. Access to recorded footage is restricted to persons authorised by the Approved Provider and may only occur for an authorised and documented safety, security, regulatory, investigative or legal purpose. Access must be limited to the footage reasonably necessary for that purpose. Any copying or external disclosure of footage must be appropriately authorised and managed in accordance with privacy and legal requirements. Cameras are never installed in bathrooms, nappy change areas, sleep rooms, or other spaces where children's dignity and privacy must be protected.

A request to access CCTV footage does not automatically entitle a person to receive a copy of that footage. Requests will be assessed having regard to applicable privacy requirements, the purpose of the request and the rights and privacy of other individuals appearing in the footage.

In addition, Keiki Early Learning uses call reports and call recordings to support service optimisation and marketing through Google. These recordings and transcripts are sent to the Keiki Hub. While they are not actively monitored, they may be accessed for auditing, training, or quality assurance purposes in accordance with Keiki's privacy and cybersecurity policies. Where telephone calls are recorded or transcribed, callers are notified of the recording. Access to recordings and transcripts is restricted to authorised personnel and recordings are only used, retained and disclosed for authorised purposes in accordance with applicable privacy and record-retention requirements.

Employee Information and Recruitment

Certain acts and practices directly related to a current or former employment relationship and an employee record may be exempt from aspects of the Privacy Act 1988. The scope of this exemption is limited and does not necessarily apply to job applicants, contractors, volunteers or information handled for purposes unrelated to the employment relationship. Keiki will continue to protect employment-related information through appropriate confidentiality, security, workplace and record-management practices.

For information about our practices relating to employee information, please contact us at the contact details listed above.

If you send us an application for employment with us, this information will be used to assess your application. This information may be disclosed to related bodies corporate and service providers for purposes such as:

a) confirming qualifications;
b) aptitude, psychological and medical testing;
c) human resources management activities; and
d) conducting screening checks as permitted or required by law.

As part of the application process, you may be asked for your specific consent to the use and disclosure of certain personal information about any pre-employment medical examination or any aptitude or psychological testing. We may also ask you to consent to the disclosure of your personal information to those people who you nominated to provide references.

A refusal to provide any of this information, or to consent to its proposed disclosure may affect the success of the application.

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Supporting Documents

Policies

Administration of Medication Policy
Arrival, Departure and Authorisation Policy
Child Protection Policy
Cleaning of Service and Equipment Policy
Code of Conduct
Educational Program and Curriculum Policy
Emergency Management Policy
Enrolment and Orientation Policy
Excursion, Incursion and Safe Transportation Policy
Family Code of Conduct
Fees Policy
OSHC Fees Policy
Governance Policy
Grievance Policy
Immunisation and Infectious Diseases Policy
Incident, Illness and Administration of First Aid Policy
Medical Conditions Policy
Record Keeping and Retention Policy
Responsible Person Policy
Technology and Cyber Security Policy
Volunteers, Relief Staff and Students Policy

Sources

- ACECQA – Australian Children's Education and Care Quality Authority. https://www.acecqa.gov.au/.
- Privacy Act 1988 (Cth), current version. https://www.legislation.gov.au/Details/C2022C00361.
- Early Childhood Australia Code of Ethics. https://www.earlychildhoodaustralia.org.au/our-publications/eca-code-ethics/.
- Education and Care Services National Law (WA) https://www.legislation.wa.gov.au/legislation/statutes.nsf/main_mrtitle_12929_homepage.html.
- Education and Care Services National Regulations (WA) (https://www.legislation.wa.gov.au/legislation/statutes.nsf/main_mrtitle_12946_homepage.html.
- Australian Government. Office of the Australian Information Commission. Australian Privacy Principles. Australian Privacy Principles - Home (oaic.gov.au).
- Guide to the National Quality Framework. https://www.acecqa.gov.au/sites/default/files/2022-05/Guide-to-the-NQF-220511-compressed.pdf.
- United Nations Convention on the Rights of the Child (1989). Convention on the Rights of the Child | UNICEF.
- Office of the Australian Information Commissioner - Notifiable Data Breaches Scheme
- ACECQA - Safe use of devices in education and care services
- ACECQA - Information sheet: Using digital devices in centre-based education and care services

Links to Regulations

National Quality Standard

Quality Area 2: Children's Health and Safety		
2.2	Safety	Each child is protected
2.2.3	Child Protection	Management, educators and staff are aware of their roles and responsibilities to identify and respond to every child at risk of abuse or neglect.
Quality Area 5: Relationships with children		

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5.1	Relationships between educators and children	Respectful and equitable relationships are maintained with each child.
5.1.2	Dignity and rights of the child	The dignity and rights of every child are maintained.
Quality Area 6: Collaborative partnerships with families and communities		
6.1	Supportive relationships with families	Respectful relationships with families are developed and maintained and families are supported in their parenting role.
Quality Area 7: Governance and Leadership		
7.1	Governance	Governance supports the operation of a quality service
7.1.1	Service philosophy and purposes	A statement of philosophy guides all aspects of the service's operations
7.1.2	Management Systems	Systems are in place to manage risk and enable the effective management and operation of a quality service
7.1.3	Roles and Responsibilities	Roles and responsibilities are clearly defines, and understood and support effective decision making and operation of the service
7.2	Leadership	Effective leadership builds and promotes a positive organisational culture and professional learning community

Education and Care Services National Regulations	
168	Education and care services must have policies and procedures
168(2)(l)	Policies and procedures in relation to governance and management of the service, including confidentiality of records
170	Policies and procedures to be followed
177	Prescribed enrolment and other documents to be kept by approved provider
181	Confidentiality of records kept by approved provider
183	Storage of records and other documents
184	Storage of records after service approval transferred

Education and Care Services National Law	
263	Application of Commonwealth Privacy Act



Review & Document Control

Policy Reviewed	Modifications
August 2017	Extension of Policy from regulations and set out expectations for all parties
6th November 2017	Sent to Panel for review. No suggested changes. Sent to families and shared on Educa, no changes recommended.
8th January 2018	Quality Area updated to reflect changes to the NQS. Centre Director term replaced with Coordinator.
6th November 2018	Families and staff are given access to this policy. Shared on Xplor. Certified Supervisor term removed, replaced with Educators.
November 2019	Removed director, replaced with coordinator. Reformatted
November 2020	Completely rewritten, using information from the Office of Australian Information Commissioner and Australian Privacy Principles
May 2021	Added photography policy.
January 2023	New format. Edited for readability (some wording changes). Addition of link to Privacy Act.
August 2025	Moved to new format. Merged with recommendations from Lawyer. Added information regarding devices, photography and cctv/phone recording.
May 2026	Minor review, checked for grammatical errors.
November 2026	Updated privacy terminology, collection, access, disclosure and data-breach requirements. Strengthened requirements relating to third-party providers, digital devices and children's images, CCTV, call recording, family-law information requests and employee information. Updated legislative and regulatory references.

Disclaimer

It is each employee, family and visitor to the service's responsibility to read, understand, follow and address any concerns with management about this policy.

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