



Busy Bees Early Learning Australia Pty Ltd (ABN 20 168 187 979) and its subsidiary entities (collectively, **Busy Bees**) own and operate Early Learning Centres (**Centres**) across Australia. The protection of personal information (including sensitive information) is very important to Busy Bees, and we are committed to protecting the privacy and confidentiality of children, families and other individuals as required by the Privacy Act 1998 (Cth) (**Privacy Act**), the Australian Privacy Principles and all other relevant codes and regulations in the provision of childcare services by its Centres.

The purpose of this privacy policy is to communicate clearly the personal information handling practices we follow when we collect, hold, use, disclose, secure and otherwise manage the personal information of the families that use our services, and other individuals who use our website or interact with Busy Bees or any of its Centres.

## DEFINITIONS

- **What is personal information?** We use the definition of personal information contained in s 6(1) of the Privacy Act. It states that personal information is 'information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion'.
- **What is sensitive information?** Sensitive Information is personal information that includes information or an opinion about an individual's: racial or ethnic origin, political opinions or associations, religious or philosophical beliefs.

## COLLECTION OF PERSONAL INFORMATION

We collect and hold personal information (including sensitive information) about:

- children, parents and/or guardians, during the course of a child's enrolment (including an enquiry in relation to a prospective enrolment);
- members of the public in relation to promotional and marketing activities;
- prospective employees, including placement students, and contractors; and
- other people who have dealings with our centres.

We collect the following types of personal information:

- names, addresses, date of birth and other contact details and other information collected on the Enrolment Form or otherwise during the enquiry and enrolment process;
- names and contact details collected in relation to marketing and promotional activities;
- information relating to children enrolled (or intending to enrol) in our Centres, including next of kin and other family details, health, education and financial information, for example information relating to funding support from the government;
- photographic images and other media;
- enrolment history and attendance records, services used and any information relating to attendance at our centres or use of our services;
- financial information, including bank details;
- citizenship or visa information, employment references and history, regulatory accreditations, driver's license information and proof of identity (in relation to prospective employees).





Where possible, we try to collect personal information directly from the individual. In relation to child enrolments, personal information is generally collected by the child's responsible guardian (generally, their parent). We will generally collect personal information via forms filled out by you (or parents/guardians, in the case of children), if you use any online services we provide (including recording your payment information such as credit card or bank account details), face-to-face contact at centres or at promotional events, by email or over the phone, or by engaging with one of our business partners or marketing initiatives.

If you choose not to provide your personal information, we may not be able to provide you with childcare services, process your application for employment or allow you to participate in training, recruitment programmes, marketing or promotional initiatives or information campaigns.

## USE OF PERSONAL INFORMATION

We only use personal information where the individual has consented, and where the use is reasonably necessary to provide childcare services (the primary purpose) or for a reasonably expected, related secondary purpose.

The primary uses of personal information include (but are not limited to):

- **Provision of Childcare services:** These purposes include:
  - to provide information in response to enrolment enquiries, and to process enrolments of children into our centres;
  - to keep parents/guardians informed about matters related to their child;
  - day-to-day administration of the centre;
  - looking after the child's educational, social and medical wellbeing;
  - to allow educators and other personnel to collaborate; and
  - to obtain feedback in relation to services provided.
- **Marketing:** if Busy Bees has collected your information directly from you and we believe you reasonably expect us to, we will use or disclose your personal information to communicate directly with you to promote our services. Busy Bees 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.

At any time, you may opt out of receiving commercial electronic messages from us. Each of our commercial emails will have an unsubscribe function which will allow you to unsubscribe from all future communications related to that purpose only. If you would like to opt out of other Busy Bees communications, please follow the opt out instructions in those emails. You can also opt out from receiving communications by emailing [marketing@busybees.edu.au](mailto:marketing@busybees.edu.au) with "unsubscribe" in the subject line.

- **Satisfying our legal obligations:** including our duty of care and in order to comply with all relevant laws and regulations.
- **Employment:** the engagement of staff, including those on placement from training institutions.





## SENSITIVE INFORMATION

We may also collect sensitive information, such as:

- health information such as details of any medical conditions or disabilities or medication requirements, as well as immunisation details
- government identifiers (such as CRN)
- religious beliefs, nationality and country of birth
- family court orders
- Tax File Number (TFN) and criminal records (in relation to prospective employees)

Generally, we will seek the prior written consent from a person before collecting sensitive information (including health information or eligibility for financial support) unless where are permitted by law to collect it without your consent. We will only collect sensitive information if it is:

- reasonably necessary for the purpose for which the individual has engaged with us, including to provide services (in the case of enrolments at our Centres), or to process an application for employment (for prospective employees), and we have obtained the consent of the individual;
- necessary to lessen or prevent a serious threat to life, health or safety; or
- as otherwise permitted or required by a relevant law.

## DISCLOSURE OF PERSONAL INFORMATION

We will only use or disclose your personal information in ways that you would reasonably expect, including so that we can provide our services to you or provide you with information, provide you with online services or information or to allow you to participate in our recruitment process, or to our service providers who support us to provide those services to you.

## WEBSITE

In addition, the Busy Bees website ([www.busybees.edu.au](http://www.busybees.edu.au)) collects the following types of information:

- **Analytics:** We use Google Analytics (hosted by a third party) to collect data about your interaction with our website. The sole purpose of collecting your data in this way is to improve your experience when using our site. The types of data we collect with these tools include: your device's IP address, device screen size, device type, operating system and browser information, geographic location, referring domain and out link if applicable, search terms and pages visited and date and time when website pages were accessed.
- **Cookies:** Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website. We use "cookies" and other data collection methods to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our website. This information is collected to analyse and improve our website, marketing campaigns and to record statistics on web traffic. We do not use this information to personally identify individuals.
- **Email lists, registrations and feedback:** We will collect information that you provide to us when signing up to mailing lists and registering for our events, or when submitting feedback on your experience with our website or via email or through the Resonate portal, or to collect voluntary feedback on your experience with our website.





## DATA QUALITY

We take steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by you that your personal information has changed.

## DATA STORAGE AND SECURITY

We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. These steps include (but are not limited to):

- password protection for electronic files;
- securing paper files in locked cabinets;
- physical access restrictions; and
- password-protected databases.

In addition, all Busy Bees employees and other personnel are required to respect the confidentiality and privacy of our children, families and other individuals.

## OVERSEAS RECIPIENTS

In some instances Busy Bees, our suppliers or service providers may transfer, store or process your personal information to in a country outside of Australia. This may include the United States, the United Kingdom and Ireland. Busy Bees will take reasonable steps to ensure that overseas recipients of personal information do not breach the Privacy Act.

## ACCESS AND CORRECTION

We will endeavour to ensure that the personal information we hold is accurate, complete and up-to-date. When you receive enrolment or re-enrolment notices, general correspondence or if we speak with you, you should check that the information we hold about you is correct.

If you wish to request access to the personal information we hold about you, or request that we change that personal information, you can do so by contacting the Busy Bees Privacy Officer on the details below. Prior to granting access to or amending your information, we may ask that you verify your identity.

If we do not grant you access to your information or we do not correct your information, we may notify you in writing setting out the reasons why we did not action your request. If we do amend your personal information, you may request us to advise any other third parties whom we have disclosed your information to. Generally, no restrictions or charges will apply.

## GENERAL

We may, from time to time, review and amend this Privacy Policy, including to reflect changes in our legal or regulatory requirements, changes in technology and/or operational requirements. All Personal Information held by us will be governed by the most recent version of our Privacy Policy as published on our website.

If you would like more information about privacy, the Privacy Act 1988 (Cth) can be viewed at [http://www.austlii.edu.au/au/legis/cth/consol\\_act/pa1988108/](http://www.austlii.edu.au/au/legis/cth/consol_act/pa1988108/) or alternatively, you can visit the Australian Information Commissioner's website at <https://www.oaic.gov.au/>.





## HOW TO CONTACT US

You can obtain further information in relation to this privacy policy, ask questions about it or provide any comments or complaints, by contacting the Busy Bees Privacy Officer on the following details:

Email: [privacy@busybees.edu.au](mailto:privacy@busybees.edu.au)

Privacy Officer  
1/1176 Sandgate Road  
Nundah QLD 4012

Any complaints relating to a breach of this policy, including the Australian Privacy Principles, you should make that complaint in writing. If you require any assistance, you may contact us.

If we receive a complaint from you about how we have handled your personal information, we will determine if any action should be taken to resolve the complaint. If we decide that a complaint should be investigated further, the complaint will usually be handled by a more senior employee of Busy Bees.

We will endeavour to respond to your complaint within 30 days of receiving your complaint. If you are not satisfied with our response you may ask for a review by a more senior officer.

## VERSION CONTROL

Version	Date	Owner	Responsibility	Change Description
1	16/09/2022	Head of Legal ANZ	Policy Development Officer	New policy

