



PRIVACY POLICY

Version 3.0

Document ID	POL012	Classification	Public
Owner	CEO	Category	Organisational Governance
Endorser	Chair, Governance & Risk Committee	Approval Date	31/08/2026
Approver	Board	Review Date	31/08/2029

1.0 Purpose

To provide clear direction for Playgroup SA staff, Board members, volunteers, students and contractors (“Workers”) in the appropriate collection, use, storage and protection of personal information relating to Workers and the Playgroup Community.

2.0 Scope

This policy applies to all Playgroup SA Workers and to all records, whether hard copy or electronic, that contain personal information relating to members of the Playgroup Community.

This includes information obtained through forms, systems, communications, interviews or discussions of a sensitive nature.

Application of this policy is mandatory.

3.0 Definitions / Glossary

For the purposes of this document, the following definitions apply:

Term	Definition
Community	Playgroup SA coordinators, children, families and carers attending playgroups and events.
Personal Information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable.
Sensitive Information	Includes information about an individual’s racial or ethnic origin, political opinions, religious beliefs, trade union membership, sexual orientation, criminal record, or health and biometric information.
Workers	Board Members, staff, contractors, students and volunteers.



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4.0 Policy Principles

Playgroup SA is committed to protecting the privacy of all individuals it engages with and managing personal information in accordance with the **Privacy Act 1988** and the Australian Privacy Principles.

Playgroup SA will:

- only collect personal information where it is reasonably necessary for its functions and activities, or required or authorised by law
- collect personal information fairly and, where appropriate, with consent
- take reasonable steps to ensure individuals are aware of why information is collected and how it will be used
- use and disclose personal information only for its primary purpose or a directly related purpose, unless otherwise required or authorised
- take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure
- provide individuals with access to their personal information and the ability to request correction

4.1 Types of Information Collected

Playgroup SA collects personal information necessary to support its services and operations.

This may include:

- name and contact details
- identification documentation
- payment and banking information
- information provided through forms, applications or feedback
- participation and service-related information
- website usage data (such as IP address, device type and pages visited)

Sensitive information will only be collected where necessary and will be afforded a higher level of protection.

4.2 Use, Disclosure and Storage of Information

Playgroup SA uses personal information to:



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- deliver services and programs
- communicate with members and stakeholders
- manage registrations, payments and participation
- meet legal and regulatory obligations

Personal information may be disclosed to:

- authorised staff and volunteers
- trusted third-party service providers (such as IT systems, payment processors or administrative providers)
- government or regulatory bodies where required or authorised by law

Playgroup SA stores personal information securely using physical, electronic and administrative safeguards.

4.3 Data Security, Retention and Disposal

Playgroup SA takes reasonable steps to:

- protect personal information from misuse, interference and loss
- ensure information is accurate, up to date and complete
- restrict access to authorised individuals only

Personal information is retained only for as long as necessary to fulfil operational, legal or regulatory requirements.

When no longer required, information will be securely destroyed or de-identified.

4.4 Data Breach Management

Playgroup SA will respond promptly to any suspected or actual data breach.

Where a data breach is likely to result in serious harm, Playgroup SA will comply with the Notifiable Data Breaches scheme under the Privacy Act 1988, including:

- assessing the breach
- taking steps to contain and remediate the incident
- notifying affected individuals where required



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- notifying the Office of the Australian Information Commissioner (OAIC) where required

4.5 Website and Cookies

Playgroup SA's website may collect usage data through cookies or similar technologies to improve functionality and user experience.

Users can manage or disable cookies through their browser settings.

4.6 Access and Correction

Individuals may request access to their personal information and request corrections where necessary.

Requests should be made to the Privacy Officer using the contact details below.

4.7 Privacy Complaints and Enquiries

If you have any questions about how your personal information is managed, or if you believe your privacy has been breached, you may contact Playgroup SA's Privacy Officer at **info@playgroupsa.com.au**

We encourage you to raise concerns as soon as possible so they can be addressed promptly.

- Complaints will be acknowledged within **7 days**
- A response will be provided within **30 days**, where possible
- If more time is required, you will be kept informed

If you are not satisfied with the outcome, you may contact the Office of the Australian Information Commissioner via www.oaic.gov.au.

5.0 Roles, responsibilities and delegations

ROLE	RESPONSIBILITY
Board	• Approves engagement of legal counsel where required • Provides oversight of governance and compliance



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ROLE	RESPONSIBILITY
CEO	- Ensures compliance with privacy legislation - Ensures appropriate systems and controls are in place - Promotes awareness of privacy obligations across the organisation
Workers	- Must comply with this policy - Must handle personal information responsibly and securely

6.0 Related Internal Policy and Supporting Documents

Legislative and Regulatory Documents	Constitution of Playgroup SA Inc
Frameworks	N/A
Policies	Code of Conduct Policy
Procedures	N/A
Work Instructions	N/A
Supporting Documents	N/A

6.1 External References and Supporting Documents

References

- [South Australia Associations Incorporations Act 7541](#)
- [Australian Charities and Not for profits Commission Act 8678 \(Cth\)](#)
- [Australian Charities and Not for profits Commission Governance Standards](#)
- [ACNC External Conduct Standards](#)
- [Australian Privacy Principles](#)



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- [Australian Privacy Act 1988](#)
- [Privacy Regulations 1988](#)
- [PC 678 South Australian Information Privacy Principles Instruction](#)
- [South Australian Department for Child Protection Information Sharing Guidelines](#)

7. Review and Version Control

This policy will be reviewed every three years or earlier if legislative or operational changes require.

8.0 Version history

Version	Date	Brief summary of change
1.0	19/07/2015	Initial document.
2.0	19/05/2021	Scheduled review.
3.0	16/02/2026	Scheduled review. Updated to new template. Content revised to reflect current best practice in respect of South Australian privacy. Endorsed by the Chair of Governance & Risk Committee.