



## POLICY DOCUMENT

Title: PRIVACY POLICY

Version: 4

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Next Review Date: September 2025

### Introduction

Iramoo Community Centre is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

### Purpose

The purpose of this policy is to provide a framework for Iramoo Community Centre in dealing with privacy considerations in line with the Privacy and Data Protection Act 2014 (VIC), the Health Records Act 2001 and the Privacy Act 1988. This includes Committee of Management, staff and volunteers.

### Policy

Iramoo Community Centre collects and administers a range of personal information for the purposes of:

- **Providing community programs:** we collect personal information on where the participant lives, their contact details, medical details, permission to photograph and be included on our community notices listing for emailed announcements. We collect personal contact details to assist with the coordination of the programs and services and to ensure the personal safety of the participant whilst they are attending our program.
- **Providing children's services programs:** we collect personal information on where the family lives, their contact details, medical details and permission to photograph. We collect this information to assist with the coordination of the programs and services and to ensure the personal safety of the child whilst they are attending our children's services programs.
- **Providing venue hire to the local community:** we collect personal information on where the users live, their contact details, photo identification (Driver's licence) and their bank details. We collect this information to administrate their usage of the centre.
- **Mail out list:** we collect addresses and email information to add to our mailing list. We collect this information to ensure we can provide centre notices to members of the community.
- **Managing employee records:** we collect personal information on where employees live, their contact details, medical details, bank details, superannuation details, tax details and qualifications. We collect this information to manage staff in their roles, to administrate their salaries and entitlements, and to ensure their safety in the workplace.

- **Running a website:** we collect and promote information on our website (including contact details) to co-ordinate and promote the diverse programs at the centre.
- **Social Media:** we collect and promote information on our Social Media Platforms (including photos of our community groups and members) to co-ordinate and promote the diverse programs at the centre. We seek written authority and/or verbal authority before taking a photo and displaying it on our Facebook page.

Iramoo Community Centre is committed to protecting the privacy of personal information it collects, holds and administers. We will store all personal information collected in a lockable cupboard or room to ensure no-one unauthorised has access to the information. Iramoo Community Centre recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other.

Iramoo Community Centre is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

Iramoo Community Centre will

- Collect only information which the organisation requires for its primary function;
- Ensure that staff and users are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Will not disclose or sell any personal information to other users of the centre without permission to do so;
- Do not disclose personal information to overseas entities;
- Store personal information securely, protecting it from unauthorised access;
- Provide staff and users with access to their own information if they need to update information or request to have access to it; and
- Destroy any personal information no longer required.

In particular, staff members and committee members shall not –

- disclose to any member of the public any personal or confidential information acquired by virtue of their position as a staff member;
- use any confidential information acquired by virtue of their position for their personal financial gain, other benefit, or for that of any other person;
- disclose to any member of the public any personal or confidential information related to the interests of individuals, groups or organisations acquired by virtue of their position;
- make statements to the media in the name of the organization; or
- permit any unauthorised person to inspect or have access to any confidential documents or other information.

This policy shall apply especially to personal information relating to families accessing child care services or other users of the Centre or any of its programs.

If there is a breach of privacy, the matter will be referred onto the Centre Manager. For all high risk breaches the matter will be referred onto the Committee of Management who will determine the required action needed.

On those occasions and for those matters that the Committee of Management elects not to make public, Committee members shall respect the confidentiality of those documents and of any deliberations in the Committee on those matters.

The obligation to protect such confidential matters from disclosure continues even after the individual Committee member is no longer serving on the Committee of Management.

The Committee of Management shall decide from time to time whether any observers shall be refused permission to attend any or all of its meetings. Where appropriate, observers may be admitted subject to their undertaking to maintain confidentiality.

Where appropriate, the President may direct that information identifying individuals be removed from material before its consideration by the Committee of Management.

## **Procedures**

Iramoo Community Centre is required to follow the Privacy Act 1988 to meet its obligations within our Service Agreement with the Department of Families, Fairness and Housing. In the case of a data breach the following process is to occur.

When a data breach is likely to result in serious harm to an individual whose personal information is involved, the Centre must use the Office of the Australian Information Commissioner (OAIC) guide on how to respond to a privacy breach to determine whether we are required to notify the OAIC of the breach.

A data breach occurs when personal information an organisation holds is lost or subjected to unauthorised access or disclosure. For example, when:

- a device with a customer's personal information is lost or stolen
- a database with personal information is hacked
- personal information is mistakenly given to the wrong person

The OAIC guide sets out a four step process for an organisation to follow when a breach of privacy occurs. A summary of the steps is below. Steps 1, 2 and 3 can be taken at the same time.

### **Step 1 Contain:**

- Take action to stop the breach happening further
- Take care not to destroy evidence that could help you work out how the breach happened

### **Step 2 Assess:**

- Work out what happened and assess risks to people
- If possible, take action to stop or mitigate any risks
- If possible, this assessment should be made within 30 days

**Step 3 Notify:**

- If required, notify people affected and the regulator OAIC

**Step 4 Review:**

- Review the breach circumstances
- Identify action to take to prevent breaches in future and take this action

If a notification to the affected individual is required, it must include recommendations about the steps they should take in response to the data breach.

**Responsibility**

It is responsibility of the Committee of Management, staff and volunteers to ensure this policy is adhered to at all times.

**Related Documents**

Privacy and Data Protection Act 2014 (VIC) Amendments as of 26 April 2021

Health Records Act 2001 Amendments as of 27 August 2020

Privacy Act 1988

Privacy Guide – A guide to complying with privacy law in Australia January 2020