

## 1. Purpose of Policy

- 1.1. Eastern Gymnastics Club ('the Club') is committed to providing the highest levels of membership service, including protecting the privacy of Members, Staff, Volunteers and other persons from whom it collects personal information. This Policy contains information which is required to be communicated by the Commonwealth Privacy Act 1988.

## 2. Definition of Coverage

- 2.1. This policy shall apply to all Members, Staff, Volunteers and other persons from whom the Club collects personal information.
- 2.2. Personal information is 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 material form or not.
- 2.3. Sensitive information is a special category of personal information as defined by the Act.
- 2.4. The 'Committee' of the Club means the individuals approved by the members at the Annual General Meeting (AGM) each year to manage the Club.

## 3. Collection and Use of Personal Information

- 3.1. The Club will only collect personal information which is necessary or directly related to one or more of the Club's functions or activities of providing services relating to gymnastics.
- 3.2. The Club will not collect sensitive information unless an individual or Member consents to the collection of the information and the information is necessary or directly related to one or more of the Club's functions or activities of providing services relating to gymnastics.
- 3.3. The Club will collect personal information on Members and other individuals from responsible persons, such as parents and legal guardians.
- 3.4. The Club will treat consent given by parents and legal guardians as consent given on behalf of Members and other individuals and notice to parents and legal guardians will act as notice given to the Member and other individuals.
- 3.5. To deliver the services offered by the Club, personal information is collected by means of:
  - a) Membership Form or Coach/Judge Details Form.
  - b) Records of fees and payments.
  - c) Records of gymnastic levels, accreditations and awards achieved.
  - d) Participation in Club and external gymnastic events and activities.
  - e) Consent forms giving permission to attend parties, sleepovers and other events.
  - f) Face to face meetings and interviews, telephone calls, faxes, letters and emails and other methods of communication.
- 3.6. If the Club receives personal information and the Club did not solicit the information, the Club will, within a reasonable time, determine whether or not the Club could have collected the information using the collection methods identified above in Clause 3.5, if the Club had solicited the information. If the Club determines that it could not have collected that personal information it will destroy the information or ensure that the information is de-identified.
- 3.7. Personal information may be used in order to:
  - a) Provide the services required.
  - b) Process internal accounting and administration, including but not limited to enrolment, competition entries and event information.
  - c) Comply with regulatory reporting required by organisations including Gymnastics Australia and Gymnastics Victoria. The Committee has determined that these organisations have appropriate privacy policies, which are available from their respective websites.
  - d) Comply with other regulatory reporting entities, which may be necessary from time to time.
  - e) Allow the Club to identify and inform members about products, services and events that might be of benefit.

- f) Assist the Club in developing marketing and fundraising strategies.
  - g) Discharge duty of care and fulfil any other legal obligations.
  - h) Provide any other services as may be deemed by the Committee to be in alignment with the stated purposes of the Club.
- 3.8. If the Club sends you information which you do not require, or you do not want the Club to disclose personal information to any other organisation (including related organisations) you can advise the Club accordingly by writing to the Club Secretary or Club Manager. If you do not advise the Club otherwise, you confirm agreement on your own behalf and/or on behalf of others you represent.
- 3.9. If you choose not to provide personal information, the Club might not be able to provide you with the services you require, or the level of service on which the Club prides itself, and in some circumstances, you and/or other individuals may not be permitted to participate in some or all activities.

#### **4. Disclosure of personal information**

- 4.1. The Club discloses personal information to other organisations that it believes are necessary to assist with the Club's functions or activities of providing services relating to gymnastics. The organisations to which the Club discloses information include:
- a) Gymnastics Australia and Gymnastics Victoria in the form of gymnast registrations.
  - b) Insurance Providers.
  - c) Professional advisors, including accountants, auditors and lawyers.
  - d) Event organisers, when entering gymnasts in external events.
  - e) Government and regulatory authorities and other organisations as required or authorised by law.
- 4.2. When the Club provides information to other organisations, it does so only for the specific purpose for which it was given to the Club. When you provide the Club with personal information about other individuals, the Club relies on you to have made them aware that you will or may provide their information to the Club, the purposes it is used, the types of third party it discloses to and how their data can be accessed.
- 4.3. If the Club holds personal information about a Member or another individual that was collected for a particular purpose or use as stated above in clause 4, the Club must not use or disclose the information for another secondary purpose unless the Member or individual has consented to the use or disclosure of the information.

#### **5. Storage of Information and Disclosure to overseas recipients**

- 5.1. The Club uses an administration system which stores information on servers located within Australia.

#### **6. Storage and supply of personal information**

- 6.1. The Club stores personal information on a computer database and in paper form.
- 6.2. Personal information may be held in both paper file and electronic file form.
- 6.3. The Club has implemented measures of a reasonable nature to ensure that all personal information about members is securely stored from misuse, interference, loss and unauthorised handling.
- 6.4. Where the Club no longer requires personal information about a Member or another individual it will take reasonable steps in the circumstances to destroy the information or ensure that the information is de-identified.

#### **7. Accuracy of personal information**

- 7.1. The Club takes reasonable steps whenever it uses, collects or discloses personal information to ensure that it is current, accurate and complete.

#### **8. Access to personal information**

- 8.1. Members have a right to access and correct their personal information, subject to some exceptions allowed by law. Members or other individuals can gain access to their personal information by contacting the Club, or by writing to the Club Secretary or Club Manager.
- 8.2. Alternatively, members or other individuals may also advise the Club at any time about inaccurate, incomplete personal information that may have changed.
- 8.3. If the Club refuses to correct the personal information as requested by the Member, or other individual, the Club must provide the Member or individual with a written notice that sets out the reasons for the refusal and the mechanisms available to complain about the refusal.

#### **9. Requirements & Responsibilities**

- 9.1. Members are required to notify any other individuals for whom they are providing information of this policy and its provisions.

9.2. Coaches, Staff and Volunteers are:

- a) required to maintain the security of personal information for Members and other staff (e.g. in rolls, registers and phone lists).
- b) not permitted to collect, make use of, disclosure of or store personal information in any way other than as provided in this Policy.

## **10. Policy Breaches**

- 10.1. Persons who would like further information about the way the Club manages the personal information it holds or wishes to make a complaint regarding this policy and or a breach of the Australian Privacy Principles, should contact the Club Secretary or Club Manager.
- 10.2. The Club will investigate any complaint and will notify the person who made the complaint of the Club's decision as soon as practicable.
- 10.3. Breach of this policy is a very serious matter, and will be dealt with by the Committee in such a manner as they shall determine.
- 10.4. Consequences of a breach of this policy for staff and coaches may range from a verbal warning to termination of employment.

## **11. Availability of this policy**

- 11.1. This policy is available on the Club's website and may be requested in hard copy from Club Secretary or Club Manager.