

9. Privacy Policy

9.1 Introduction

GLENRAC is committed to protecting the privacy of personal information which it collects, holds and administers by preventing wrongful access, collection, disclosure or release of personal information by verbal, written or electronic means.

9.2 Purpose

The policy is designed to ensure that GLENRAC staff, members and volunteers comply with and observe the statutory requirements of the *Privacy Act 1988*.

9.3 Policy

All staff, members, volunteers and committee of GLENRAC shall be aware and observant of the 13 Australian Privacy Principles (AAPs), outlined in the Privacy Act 1988, which are summarised below:

1	Open and transparent management of personal information	Personal information must be managed in an open and transparent way. This includes having a clearly expressed and up to date privacy policy.
2	Anonymity and pseudonymity	Individuals have the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.
3	Collection of solicited personal information	This principle outlines when an organisation can collect personal information that is solicited. It applies higher standards to the collection of sensitive information.
4	Dealing with unsolicited personal information	Outlines how organisations must deal with unsolicited personal information.
5	Notification of the collection of personal information	Outlines when and in what circumstances an organisation that collects personal information must tell an individual about certain matters.
6	Use or disclosure of personal information	Outlines the circumstances in which an organisation may use or disclose personal information that it holds.
7	Direct marketing	An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.
8	Cross-border disclosure of personal information	Outlines the steps an organisation must take to protect personal information before it is disclosed overseas.
9	Adoption, use or disclosure of government related identifiers	Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

10 Quality of personal information	An organisation must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. It must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.
11 Security of personal information	An organisation must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An organisation has obligations to destroy or de-identify personal information in certain circumstances.
12 Access to personal information	Outlines an organisation's obligations when an individual requests to be given access to personal information held about them by the organisation. This includes a requirement to provide access unless a specific exception applies.
13 Correction of personal information	Outlines an organisation's obligations in relation to correcting the personal information it holds about individuals.

See the [OAIC website for more information about the Australian Privacy Principles](#), including definitions of key terms and details on each of the principles.

9.4 Procedures

1. OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

GLENRAC will:

- Ensure stakeholders are aware of this policy and make this information freely available.
- Take reasonable steps to implement practices, procedures and systems that will ensure it complies with all APPs and deal with related enquiries and complaints.
- Ensure that stakeholders will be provided with the opportunity to 'opt-out' or unsubscribe from marketing information (eg email newsletters or text messaging)

2. ANONYMITY AND PSEUDONYMITY

GLENRAC will give stakeholders the option of not identifying themselves or of using a pseudonym when dealing with the group in relation to a particular matter.

3. COLLECTION OF SOLICITED PERSONAL INFORMATION

GLENRAC will:

- Only collect information that is reasonably necessary for the functions or activities of GLENRAC. Where practicable, collection of personal information will only occur from interaction with that individual.
- Only collect sensitive information where the above conditions are met and the individual concerned consents to the collection.
- Notify stakeholders about why we collect information and how it is administered and that it is accessible to them.

4. DEALING WITH UNSOLICITED PERSONAL INFORMATION

Unsolicited personal information is any personal information received by the group that has not been requested by the group. In relation to this information, the Chief Executive Officer will decide whether it could have collected the information under APP3 or whether the information is contained in a Commonwealth record and:

- if the answer to both these questions is no, the Chief Executive Officer will destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so under APP4.3.
- If the answer to one of these questions is yes, GLENRAC may keep the information, but the Chief Executive Officer must ensure the information is dealt with in accordance with APPs 5-13.

5. NOTIFICATION OF THE COLLECTION OF PERSONAL INFORMATION

GLENRAC will take reasonable steps before, at the time or as soon as practicable after it collects personal information about an individual to notify the individual of certain matters including, GLENRAC's identity and contact details, the purposes, and circumstances of collection, whether collection is required by law and the consequences if personal information is not collected.

6. USE OR DISCLOSURE OF PERSONAL INFORMATION

GLENRAC will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- Obtain consent from the affected party for all other uses.

7. DIRECT MARKETING

GLENRAC will not disclose personal information for direct marketing purposes.

8. CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

GLENRAC will not disclose personal information to an overseas recipient.

9. ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

GLENRAC will not adopt as its own identifier the identifier of other agencies or service providers, eg Centrelink identification number.

10. QUALITY OF PERSONAL INFORMATION

GLENRAC will take reasonable steps to ensure the information we collect, use or disclose is accurate, up-to-date and complete and relevant to the functions we perform.

11. SECURITY OF PERSONAL INFORMATION

GLENRAC will safeguard the information we collect against misuse, interference and loss, unauthorised access, modification, and disclosure. Reasonable steps will be taken to destroy or permanently de-identify personal information no longer needed.

12. ACCESS TO PERSONAL INFORMATION

GLENRAC will ensure individuals are granted access upon request to any personal information held about them.

13. CORRECTION OF PERSONAL INFORMATION

GLENRAC will correct any personal information to ensure that it is accurate, up-to-date, complete, relevant, and not misleading.

9.5 Making information available to third parties.

GLENRAC:

- a) Can only release personal information about a person with that person's expressed permission. For personal information to be released, the person concerned must sign a release form.
- b) Can only release information to a third person where it is requested by the person concerned.
- c) If the information is required in order to inform members of opportunities or events that are in line with our organisation's mission or vision, we will inform members via GLENRAC's marketing channels. GLENRAC will not provide the information directly to a third party in electronic format.

9.6 Complaints

All complaints against GLENRAC staff, employees, committee, or volunteers in respect of privacy must be reviewed and investigated according to the process outlined in the GLENRAC Grievance Policy. The Committee of Management shall be informed of all complaints, privacy requests and responses to privacy requests.

9.7 Responsibilities

It shall be the responsibility of the Committee of Management to ensure that all requirements of this policy are complied with.

The Committee of Management, staff and volunteers are responsible for the implementation of this policy.