



## Privacy and Confidentiality Policy

Policy number	8	Version	2
Drafted by	President	Responsible Person	President
Approved by	10/07/2019	Review Timetable	Every 2 years
Committee on			
<b><u>Review History:</u></b>			
Date: 14/7/2020		By: Secretary	
Date: 21/9/2022		By: President	

### INTRODUCTION

The Committee of Gallipoli Barracks Community Centre (GBCC) 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.

Information management systems rely on any necessary restrictions on the free circulation of information being respected by those into whose hands the information is entrusted.

### PURPOSE

The purpose of this document is to provide a framework for Gallipoli Barracks Community Centre in dealing with privacy and confidentiality considerations.

### POLICY

Gallipoli Barracks Community Centre will place the minimum of restrictions on the information it holds, but will ensure that such restrictions as are considered necessary are observed by its staff and volunteers.

Gallipoli Barracks Community Centre collects and administers a range of personal information for the purposes of activities and membership. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

GBCC 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. These privacy values are reflected in and supported by our core values and reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

Gallipoli Barracks 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.

Gallipoli Barracks Community Centre will:

- Collect only information which the organisation requires for its primary function.
- Ensure that members 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.
- Store personal information securely, protecting it from unauthorised access.
- Place restrictions on the information it holds, and will ensure that such restrictions as are considered necessary are observed by its staff and volunteers.
- Provide members with access to their own information, and the right to seek its correction.

## AUTHORISATION

*Carl Smith*  
Committee Secretary  
Date: 01/06/2023





## Privacy and Confidentiality Procedures

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### RESPONSIBILITIES

Gallipoli Barracks Community Centre's President is responsible for:

- The implementation of this policy.
- Reviewing this policy as and when the need arises.

Gallipoli Barracks Community Centre's President is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

All employees and committee members are responsible for observing confidentiality procedures in their workplace.

### PROCESSES

#### Collection

Gallipoli Barracks Community Centre will:

- Only collect information that is necessary for the performance and primary function of Gallipoli Barracks Community Centre.
- Notify members about why we collect the information and how it is administered.
- Notify members that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).



- Determine where unsolicited information is received, whether the personal information could have been collected in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

## **Use and Disclosure**

Gallipoli Barracks Community Centre will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, Gallipoli Barracks Community Centre will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
  - the person has consented; or
  - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and GBCC has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- State in GBCC privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as GBCC is required to be.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then GBCC must take steps to correct it. GBCC may allow a person to attach a statement to their information if GBCC disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

## **Storage at Gallipoli Barracks Community Centre**

Gallipoli Barracks Community Centre will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.

- Before GBCC discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. GBCC will have systems which provide sufficient security.
- Ensure that GBCC's data is up to date, accurate and complete.

### **Destruction and de-identification Gallipoli Barracks Community Centre**

Gallipoli Barracks Community Centre will:

- Destroying personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information GBCC holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

### **Data Quality**

Gallipoli Barracks Community Centre will:

- Take reasonable steps to ensure the information GBCC collects is accurate, complete, up to date, and relevant to the functions we perform.

### **Data Security and Retention**

Gallipoli Barracks Community Centre will:

- Only destroy records in accordance with the organisation's Records Management Policy.

### **Openness**

Gallipoli Barracks Community Centre will:

- Ensure stakeholders are aware of GBCC's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

### **Access and Correction**

Gallipoli Barracks Community Centre will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

### **Anonymity**

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

### **Making information available to other organisations**

Gallipoli Barracks Community Centre can:

- Release information to third parties where it is requested by the person concerned.

### **Information Management**

The records management processes of the organisation shall incorporate procedures for designating information confidential.

### **Restriction**

Gallipoli Barracks Community Centre will place restrictions on the information it holds when the information:

- Is commercial in confidence;
- Concerns the privacy of its staff, volunteers and members;
- Requires protection to safeguard the intellectual property of the organisation.

Staff dealing with restricted material will be instructed in the recognition of material falling under these headings.

### **Identification**

Any information on which restrictions have been placed shall be as far as possible clearly identified on the document or file. Where categories of information, rather than individual documents, are restricted this restriction will be conveyed to staff and volunteers dealing with this information.

### **Protection**

Staff of the organisation, and volunteers dealing with restricted information, shall be required to sign a confidentiality agreement (see [Appendix A](#))

### **Training**

All staff and Committee members will be instructed in the requirements of this policy.

## **RELATED DOCUMENTS**

- [Privacy Policy](#)
- Records Management Policy

## **AUTHORISATION**



Committee President

Date: 1/6/2023

## APPENDIX A

# CONFIDENTIALITY AGREEMENT

I agree to hold confidential all information that Gallipoli Barracks Community Centre has placed restrictions on, and to release it to persons outside the organisation only when authorised by the organisation and subject to any conditions set by the organisation.

I undertake to:

- 1) Access information held by the organisation only when necessary to the performance of my assigned duties;
- 2) Make copies of restricted information only when necessary to the performance of my assigned duties;
- 3) Oversee the storage and handling of restricted information to minimise the risk of its diversion into unauthorised channels;
- 4) Take reasonable care to properly secure confidential information on my computer and will take steps to ensure that others cannot view or access such information;
- 5) Not disclose my personal password(s) to anyone without the express written permission of the Committee, or record or post it in an accessible location, and will refrain from performing any tasks using another's password; and
- 6) Notify the Committee if I have reason to believe that my access codes and passwords have been compromised.

Signed \_\_\_\_\_

Date \_\_\_\_\_