



PRIVACY POLICY

Policy number	18	Version	1
Drafted by	K Robinson	Approved by	10/07/2019
Responsible person	K Robinson	Committee on Scheduled review date	01/07/2021

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.

PURPOSE

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

POLICY

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 (156).

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; and
- Provide members with access to their own information, and the right to seek its correction.



AUTHORISATION

[Signature of Committee Secretary]
[Date of approval by the Committee]
Gallipoli Barracks Community Centre



PRIVACY PROCEDURES

Procedures number	17	Version	1
Drafted by	K Robinson	Approved by President on	10/07/2019
Responsible person	K Robinson	Scheduled review date	01/07/2021

RESPONSIBILITIES

Gallipoli Barracks Community Centre's Committee is responsible for developing, adopting and reviewing this policy.

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.

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).

Policies and Procedures can be established or altered only by the Committee.

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 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 authorized 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 Gallipoli Barracks Community Centre

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized 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

- Destroy personal information once it 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.

RELATED DOCUMENTS

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

AUTHORISATION

[Signature of President]

[Name of President]

[Date]

PRIVACY POLICY – FOR EXTERNAL USE/PRIVACY ACT COMPLIANCE

PRIVACY POLICY

Your privacy is important

This statement outlines the Gallipoli Barracks Community Centre's policy on how the Gallipoli Barracks Community Centre uses and manages personal information provided to or collected by it.

The Gallipoli Barracks Community Centre is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The Gallipoli Barracks Community Centre may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the Gallipoli Barracks Community Centre's operations and practices and to make sure it remains appropriate to the changing legal environment.

What kind of personal information does the Gallipoli Barracks Community Centre collect and how does the Gallipoli Barracks Community Centre collect it?

The type of information the Gallipoli Barracks Community Centre collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Names of family members and their ages;
- Contact information, such as phone numbers;
- Association to defence.

Personal Information you provide:

The Gallipoli Barracks Community Centre will generally collect personal information held about an individual by way of phone calls, messages, forms and meetings. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

In some circumstances the Gallipoli Barracks Community Centre may be provided with personal information about an individual from a third party, for example members of the centre.

In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the Gallipoli

Barracks Community Centre's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the Gallipoli Barracks Community Centre and employee.

How will the Gallipoli Barracks Community Centre use the personal information you provide?

The Gallipoli Barracks Community Centre will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to marketing, the Gallipoli Barracks Community Centre will not use your personal information for marketing where you have provided information, and you are likely to expect marketing. If we use your personal information obtained from elsewhere, we will still send you marketing information only if you have consented. We will always obtain your consent to use sensitive information as the basis for any of our marketing.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, the Gallipoli Barracks Community Centre's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor.

The purposes for which the Gallipoli Barracks Community Centre uses personal information of job applicants, staff members and contractors include:

- for insurance purposes;
- to gain an understanding of the person and their background;
- to ensure they meet all current centre obligations;
- to satisfy the Gallipoli Barracks Community Centre's legal obligations,

Where the Gallipoli Barracks Community Centre receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

Volunteers:

The Gallipoli Barracks Community Centre also obtains personal information about volunteers who assist the Gallipoli Barracks Community Centre in its functions or conduct associated activities, such as to enable the Gallipoli Barracks Community Centre and the volunteers to work together.

Marketing and fundraising:

The Gallipoli Barracks Community Centre treats marketing and seeking donations for the future growth and development of the Gallipoli Barracks Community Centre as important.

Who might the Gallipoli Barracks Community Centre disclose personal information to?

The Gallipoli Barracks Community Centre may disclose personal information, including sensitive information, held about an individual to:

- government departments;
- people providing services to the Gallipoli Barracks Community Centre,
- ..; and
- anyone you authorise the Gallipoli Barracks Community Centre to disclose information to.

Sending information overseas:

The Gallipoli Barracks Community Centre will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

We do not use overseas providers of IT services including servers and cloud services.

How does the Gallipoli Barracks Community Centre treat sensitive information?

In referring to ‘sensitive information’, the Gallipoli Barracks Community Centre means:

“information relating to a person’s racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual”.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

The Gallipoli Barracks Community Centre’s staff are required to respect the confidentiality of personal information and the privacy of individuals.

The Gallipoli Barracks Community Centre has in place steps to protect the personal information the Gallipoli Barracks Community Centre holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

Updating personal information

The Gallipoli Barracks Community Centre endeavours to ensure that the personal information it holds is accurate, complete and up to date. A person may seek to update their personal information held by the Gallipoli Barracks Community Centre by contacting the Coordinator of the Gallipoli Barracks Community Centre at any time.

The Australian Privacy Principles and the Health Privacy Principles require the Gallipoli Barracks Community Centre not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information the Gallipoli Barracks Community Centre holds about you.

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the Gallipoli Barracks Community Centre holds about them and to advise the Gallipoli Barracks Community Centre of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information the Gallipoli Barracks Community Centre holds about you, please contact the Coordinator in writing.

The Gallipoli Barracks Community Centre may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, the Gallipoli Barracks Community Centre may charge a fee to retrieve and copy any material. Gallipoli Barracks Community Centre If the information sought is extensive, the Gallipoli Barracks Community Centre will advise the likely cost in advance.

How long will the Gallipoli Barracks Community Centre keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

Enquiries and privacy complaints

If you would like further information about the way the Gallipoli Barracks Community Centre manages the personal information it holds, please contact the Coordinator. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Coordinator who will first deal with you usually in person or over the phone. If we then have not dealt satisfactorily with your concerns, we will meet with you again to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting, then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: enquiries@oaic.gov.au
- tel: 1300 363 992
- fax: +61 2 9284 9666