



## **DUNTROON COMMUNITY CENTRE INC**

### **PRIVACY POLICY**

#### **Your privacy is important**

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

The Duntroon 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. In relation to health records, the Duntroon Community Centre is also bound by the Australian Capital Territory Health Privacy Principles, which are contained in the Health Records (Privacy and Access) Act 1997.

The Duntroon Community Centre may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the Duntroon 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 Duntroon Community Centre collect and how does the Duntroon Community Centre collect it?**

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

- Dates of birth, residential address, car registration and your relationship with the ADF or other Australian Government employer. This information is obtained via the annual membership form.
- For children who attend playgroup and playschool, medical information (i.e. allergy, asthma information) relevant to ensuring the safe operation of the facility. This information is obtained from the annual enrolment form.
- Photographs, including but not limited to children attending playschool and playgroup, staff and general members of the Duntroon Community Centre. You will have signed a photography at the centre consent form when becoming a member of Duntroon Community Centre. Images of playschool children and playgroup children are taken whilst using the facilities of Duntroon Community Centre. Images are not posted on social media websites without the express permission of the child's parent or guardian.

#### **Personal Information you provide:**

The Duntroon Community Centre will generally collect personal information held about an individual by way of forms, survey's and occasionally photo's of children in the playschool and at our functions. 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 Duntroon Community Centre may be provided with personal information about an individual from a third party, for example Centrelink.

#### **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 Duntroon Community Centre's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between the Duntroon Community Centre and employee. However, the Duntroon Community Centre must provide access and ensure compliance with the Health Privacy Principles under the Health Records (Privacy and Access) Act 1997.

#### **How will the Duntroon Community Centre use the personal information you provide?**

The Duntroon 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 direct marketing, the Duntroon Community Centre will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

#### **Job applicants, staff members and contractors:**

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

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

- for insurance purposes;
- to perform background checks as required by the ACT Children and Young People Act 2008;
- to perform security checks as required by RMC-A in order to obtain a base pass for RMC-D;
- to satisfy the Duntroon Community Centre's legal obligations,

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

**Marketing and fundraising:**

The Duntroon Community Centre does not engage third party fundraising business to fundraise on its behalf.

**Who might the Duntroon Community Centre disclose personal information to?**

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

- government departments;
- people providing services to the Duntroon Community Centre
- RMC-A; and
- anyone you authorise the Duntroon Community Centre to disclose information to.

**Sending information overseas:**

The Duntroon 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 use overseas providers of IT services including servers and cloud services.**

The Duntroon Community Centre has confirmed our IT Service Providers adherence to the Australian Privacy Principles.

**How does the Duntroon Community Centre treat sensitive information?**

In referring to 'sensitive information', the Duntroon 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 Duntroon Community Centre's staff are required to respect the confidentiality of personal information and the privacy of individuals.

The Duntroon Community Centre has in place steps to protect the personal information the Duntroon 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.

Photographs taken in the playschool rooms are done so with Duntroon Community Centre camera's. They are stored on Duntroon Community Centre with passworded access rights and images are deleted from the device once uploaded to the computer.

## **Updating personal information**

The Duntroon 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 Duntroon Community Centre by contacting the Privacy Officer of the Duntroon Community Centre at any time.

The Australian Privacy Principles and the Health Privacy Principles require the Duntroon 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 Duntroon Community Centre holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which the Duntroon Community Centre holds about them and to advise the Duntroon 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 Duntroon Community Centre holds about you, please contact the Privacy Officer in writing.

The Duntroon 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 Duntroon Community Centre may charge a fee to retrieve and copy any material. If the information sought is extensive, the Duntroon Community Centre will advise the likely cost in advance.

## **How long will the Duntroon 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 Duntroon Community Centre manages the personal information it holds, please contact the Privacy Officer. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy

Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you 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](mailto:enquiries@oaic.gov.au)
- tel: 1300 363 992
- fax: +61 2 9284 9666