

Commitment to your privacy

The Federation of Western Australia Police and Community Youth Centres Inc ('WA PCYC', 'we', 'our', 'us') is committed to ensuring that your personal information is handled in accordance with Australian privacy laws.

WA PCYC respects the privacy of its staff, volunteers, donors, members, participants and contractors in the collection, management and use of information. We understand that your personal information, how we use it, and how it is protected, is very important to you. This policy is written in simple language. The specific legal obligations of WA PCYC when collecting and handling your personal information are outlined in the *Privacy Act 1988* and in particular in the Australian Privacy Principles found in that Act. We will update this privacy policy when our information handling practices change.

This Privacy Policy sets out how we collect, use, store and disclose your personal information. We use a number of key terms in this privacy policy including "consent", "personal information" and "sensitive information". The meaning of these terms are contained in Appendix A.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

Overview

We will:

- not use or disclose personal information about an individual for a purpose other than:
 - (a) the purpose for which it was collected;
 - (b) a related purpose (or, in the case of sensitive information, a "directly related" purpose) which the individual would reasonably expect;
 - (c) a purpose required or permitted by law; or
 - (d) a purpose for which we have obtained the consent of the individual.
- take all reasonable steps to make sure that the personal information we collect, use or disclose is accurate and up to date;
- take all reasonable steps to protect and safeguard the personal information we collect;
- maintain a data breach response plan so as to quickly assess, deal with and notify of any notifiable data breach that may occur in relation to the personal information that we collect;
- make available our policies on our management of personal information;
- provide individuals with access to their personal information that we hold, except where we are required or entitled by law to refuse access.

Purpose for collecting information

We will only collect personal information if we consider it necessary for us to provide services. The information we collect depends on our relationship with the individual and the nature of the services we are performing or providing. We may collect information from our staff, volunteers, donors, members, participants and contractors for the following purposes:

- to assist us in delivering activities, services and programs;
- to ensure we comply with our legal obligations and other WA PCYC policies, in particularly our obligations under child protection laws in reporting accidents and injuries and in order to meet our occupational health and safety obligations,
- to inform community members of opportunities to support our work; and
- other functions and activities related to the above purposes as set out in WA PCYC's Privacy Policy.

Where an individual chooses not to supply personal information, particularly information relevant to employment, an activity, a member application or consent, or a contractual arrangement, WA PCYC may not be able to properly consider your application or enter into a contract with you.

Collection of personal information and type of information

Situations in which we may collect and hold personal information include, but are not limited to:

- when processing membership forms and any subsequent amendments to members' details: In the case of members and participants, information may include name, age, address, gender, contact details, emergency contact information, parent/carer/guardian or family details and contacts, activity interests, health information including injuries and on-going medical conditions, special needs relating to language, religious or cultural background and information about services offered or provided;
- through activity or program enrolment and consent forms: information may include name, age, address, gender, contact details, emergency contact information, parent/carer/guardian or family details and contacts, activity interests, level of achievement or certification in the activity, health information including injuries and on-going medical conditions, dietary needs/preferences, special needs relating to language, religious or cultural background and information about services offered or provided;
- through recruitment processes and forms (both employees and volunteers): information may include, name, age, gender, contact details, emergency contact details, qualifications, previous work history, referee statements, prohibited employment declaration, working with children consent, working with children screening report, and criminal record report;
- through Service contracts: information may include name, age, gender, contact details, emergency contact details, qualifications, prohibited employment declaration, working with children consent, working with children screening report, and criminal record report;
- in connection with accident and incident forms: information may include name, age, gender, contact details, emergency contact information, parent/carer/guardian or family details and contacts, health information including medical conditions, injuries, harm and treatment received, behavioural issues and actions taken. Information may also include material collected using security surveillance systems. After an accident has occurred information may also be collected about an individual from third parties for the purposes of completing that form;
- through third parties such as statutory bodies and other government agencies in order to deliver services to participants;
- through third parties such as telemarketers or mailing houses engaged by WA PCYC to promote its activities;
- through donation information forms: information may include name, age, gender, contact details, WA PCYC areas of interest and if relevant credit card details;

- through individuals accessing the WA PCYC web-site as set out in the Internet section of this policy: the nature of the information collected will depend on whether the person visiting the web-site registers when they visit the website but may include information about that person's use of WA PCYC's website such as the time of visit, duration and the pages visited.

As part of our communication and donor programs, WA PCYC may also collect information through publicly and commercially available information sources and databases. WA PCYC only uses such sources if its collection and use of this information also complies with the National Privacy Principles and the *Spam Act 2003*.

WA PCYC shall collect, hold and use personal data about an individual only as permitted or required by applicable laws. WA PCYC may be required by its funding bodies to collect personal data pertaining to the delivery of contracted programs for reporting purposes. This population level data is collected under agreement with providers and is de-identified. This data is generally related to age, ethnicity and social situation.

Members may be allocated a membership number for administrative purposes. Donors may also be allocated a computer-generated number to identify them for donor administration purposes. The numbers allocated have no relationship to any identifier allocated by any other agency.

WA PCYC may establish security surveillance systems to assist it to monitor and protect the safety of its members, staff, contractors and visitors and to monitor the security of its premises. Video data collected via the use of surveillance systems is only retained and used where an incident or accident requires use of that data.

Use of your personal information

WA PCYC shall take all legally required and commercially reasonable steps to ensure that personal data is reliable for its intended use, accurate, complete and, where necessary, appropriately updated. In addition, WA PCYC shall collect, hold and use personal data only for specific, legitimate business purposes and in a manner consistent with the purposes for which it was collected. The data may be used directly or indirectly for:

- compliance with legislative, regulatory and/or funding requirements.
- to comply with obligations under law, such as those relating to Child Protection.
- Administration of membership and participant systems.
- Tailoring of services and activities to member, user or donor interests and background
- Assistance to medical or emergency service providers to deliver care in an incident or emergency.
- Communication to members, users and donors about WA PCYC or promoting WA PCYC activities or initiatives.
- Surveys and analysis to better target future WA PCYC activities and to better promote opportunities to support WA PCYC activities
- Assessment of suitability of potential employees and volunteers for work with children and young people, including transfer of information provided to WA Police and Commission for Children and Young People as part of that process
- To assess, investigate and process accidents and incidents and to assist with insurance claims
- execution of risk and probity checks in respect of contract management.
- perform administrative operations, including accounting, payroll, risk management, record keeping, archiving, systems development and testing.
- conduct internal marketing or client satisfaction research.

All information collected by WA PCYC will only be used for the purposes set out in the policy unless;

- PCYC is required by law to disclose the information

- PCYC is authorised under the Privacy Act or the Health Privacy Act to use the information for another purpose,
- A person consents in writing to PCYC using information about them for another purpose not specified in this policy.

WA PCYC may collect information from unsuccessful applicants for employment or volunteer work. This information will only be retained for future recruitment purposes if agreed by the candidate. Information collected from individuals appointed as employees or volunteers is retained as part of a WA PCYC employee or volunteer record.

Disclosure of your information

WA PCYC will disclose your information to the following types of parties:

- to parties nominated by you in the case of an emergency.
- external payment systems operators where appropriate.
- Commonwealth and State government agencies and other funders.
- where WA PCYC is authorised or required by law to comply with a request for your personal or sensitive data.

If at any point, you do not wish for us to collect, use or disclose information about you, please inform us and we will discuss the implications of this with you. The non-collection of personal data may result in limited access to WA PCYC services and programs.

WA PCYC may provide members or supporters contact information to external partner organisations such as direct marketing or telemarketers involved in managing communications and promotions on behalf of WA PCYC or in providing goods or services WA PCYC believes will be of benefit or interest to its members and supporters.

WA PCYC will only deal with such organisations if they have a Privacy Policy based on the National Privacy Principles and have formally committed not to use information provided by WA PCYC for any other purpose than that approved by WA PCYC. Members will have an opportunity to opt-out of receiving third-party communications in the membership form or by writing to WA PCYC requesting to opt-out.

WA PCYC will not sell its information to an outside organisation.

Protection of your personal information

WA PCYC shall take all legally required and commercially reasonable measures, proportional to the associated risk, to protect and safeguard personal information which we collect from loss, misuse, unauthorised access or disclosure, alteration and destruction.

WA PCYC employees, volunteers and the contractors who provide services related to information systems are obliged to respect the confidentiality of any personal or sensitive information held.

Information will be held in a variety of ways, including in paper and electronic format, on secure databases that are only accessible by relevant employees and volunteers. WA PCYC may also hold photographic and video images taken of you with consent on secure systems. WA PCYC takes all reasonable steps to obtain written permission to take and use photographs and video images.

All credit card or bank account details provided to WA PCYC when purchasing products, memberships, or donating to WA PCYC, are treated confidentially and will never be shared with any third parties that are not directly involved in completing the transaction, unless required to do so by law.

If any unauthorised access to, or disclosure of, your personal information occurs, we maintain a data breach response plan which complies with the scheme established under the Privacy Amendment (Notifiable Data Breaches) Act 2017 and which allows us to quickly assess any data breach which may occur, take any appropriate remedial action and notify all relevant parties, including the Privacy Commissioner of any notifiable data breach including what steps should be taken in response.

WA PCYC does not use communication tools hosted overseas to enable us to communicate with key stakeholders within and outside of our region.

WA PCYC is not responsible for any events, costs, damages, loss or liability arising from unauthorised access to personal information and limits all liability to the extent permitted by law.

Our Website and Cookies

We may collect personal information about you when you use and access our website. Our website can be found at www.wapcyc.com.au (External link).

WA PCYC may collect information from users via tracking technologies known as cookies. Cookies are packets of information or data that are collected from a user's browser activity which help to assist WA PCYC to deliver its web services. You can disable cookies through your internet browser, but our websites may not work as intended for you if you do so.

Cookies may include but are not limited to tracking of a user's duration on the website, time of access, page errors, numbers of unique visitors, page visits, links selected and exit points.

Any information or data collected by WA PCYC through cookies will not ordinarily reveal any personal or sensitive information about the user, however where a user registers a membership, or places a donation via the website then some personal information may be obtained to assist WA PCYC to deliver its services or complete the transaction.

A user can manage their cookies settings by amending their browser preferences, however the services provided by WA PCYC may be limited if cookies are restricted.

WA PCYC may provide links to websites outside of its own. These links are not under the control of WA PCYC, and therefore WA PCYC does not accept responsibility for any events, costs, damages, loss or liability arising from the use of these links or for the conduct of the host providers of those links.

Promotional emails and surveys

WA PCYC may contact users or members to provide promotional information or request the completion of surveys from time to time. However, before doing so WA PCYC will first ask for permission to send this type of information.

A user or member that has consented to receiving promotional or survey information may notify WA PCYC if they no longer wish to receive such information. Notification can occur by providing written notice to WA PCYC or to the affiliated provider who sent the information.

WA PCYC will endeavour to process the request within seven (7) business days.

Access and Correction

WA PCYC takes all reasonable steps to ensure that the information it collects, stores, uses and discloses is accurate and regularly updated.

Members, donors, employees, contractors and volunteers may access their own personal information held by WA PCYC by requesting access in writing. WA PCYC will endeavour to process any requests within 14 days.

Access can be requested either by email or by mail as follows:

Email: Privacyofficer@wapcyc.com.au

Mail: Privacy Officer,
WA PCYC, Level 1, Home Base Business Centre,
55 Salvado Road,
Subiaco WA 6008

Access to sensitive or personal information of children under 18 years of age will be permitted only for those individuals with legal responsibility for the child in question and where there is no perceived risk to the child in providing that information.

Details will be forwarded by mail or email to the recorded addresses or to alternate addresses, subject to the individual providing proof of identity (i.e. drivers licence or Australian Passport etc) and satisfying any other reasonable request of WA PCYC.

If you believe that any information that we hold about you is inaccurate or out of date, please advise us via return email and we will review and update the relevant information.

There will be no charge to a person accessing or correcting their information.

Complaints

Complaints concerning the use of personal information or the application of this Privacy Policy must be made:

In writing to: The Complaints Officer
WA PCYC, Level 1, Home Base Business Centre,
55 Salvado Road,
Subiaco WA 6008,

or via e-mail: complaints.officer@wapcyc.com.au

If you are not satisfied with the outcome of your complaint, you can refer your complaint to:

Contact: Office of the Australian Information Commissioner
Phone: 1300 363 992

Post: GPO Box 5218,
Sydney
NSW 2001

Online form: www.oaic.gov.au (Privacy Complaint Form).

Email: enquiries@oaic.gov.au

Amendments

WA PCYC reserves the right to review, amend and update this Privacy Policy at any time without notice. Any alterations will take effect at the time they are published on the WA PCYC website.

Appendix A

Definitions

'Personal information'- means information or an opinion, whether true or not, or recorded in any form or not, about an individual whose identity is apparent, or can reasonably be ascertained. References to 'personal information' include sensitive information and health information.

'Sensitive information'- is personal information or an opinion (that is also personal information) about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information (that is not otherwise health information), biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or biometric templates.

'Privacy law'- refers to legislation that applies to WA PCYC's collection and use of personal information. WA PCYC is required to comply with the *Privacy Act 1988 (Cth)* and is bound by the Australian Privacy Principles ('APPs) set out in that Act.

'Identifier'- of an individual as a number, letter or symbol, or a combination thereof, that is used to identify or verify the identity of an individual but does not include the individual's name.

'De-identified'- "information is de-identified if the information is no longer about an identifiable individual or an individual who is reasonably identifiable". De-identified information is no longer considered personal information under the *Privacy Act 1988* and can be shared.