

# **SPRINGWOOD & DISTRICT CITIZENS BOYS AND GIRLS CLUB PRIVACY POLICY**

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**POLICY NAME:** Springwood Boys and Girls Club Privacy Policy  
**DATE OF ISSUE:** January 2013  
**DATE OF REVIEW:** January 2015  
**CONTROLLING BODY:** Springwood Boys and Girls Club - Management Committee

## **1. STATEMENT OF COMMITMENT**

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Springwood Boys and Girls Club is committed to providing the highest levels of membership service. This includes protecting member's privacy. We will be bound by the new sections of the Commonwealth Privacy Act (1988), which sets out a number of principles concerning the protection of individual's personal information.

The aim of these new laws is to ensure that organisations handle personal information responsibly and provide a consistent approach to its collection, use, disclosure, access and protection. These new laws also give the individual new rights such as access to their personal information and the ability to correct it, if needed.

This Privacy Statement contains the following important information the Privacy Act requires us to communicate to all of our members, regarding the use of personal information:

- Define what is personal information
- How we collect personal information
- How we use personal information
- When we disclose personal information
- Storage and security of personal information
- Accuracy of personal information
- Access to personal information

## **2. POLICY COVERAGE**

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### **What is personal information?**

Personal information is defined in the Privacy Act as information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

### **What is an organisation?**

- an individual; or
- a body corporate; or
- a partnership; or
- any other unincorporated association; or
- a trust; or
- that is not a small business operator, a registered political party, an agency, a State or Territory authority or a prescribed instrumentality of a State or Territory.

**What information will be covered?**

All personal information gathered by, or on behalf of, Springwood Boys and Girls Club for the purpose of managing membership, education, events and merchandise.

**3. APPLICATION OF POLICY**

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This Policy applies to all members of the Springwood Boys and Girls Club; employees, officers, administrators, volunteers, coaches, judges, athletes and officials.

This Policy applies equally to members involved in each of the Springwood Boys and Girls Club's disciplines, including Men's Artistic Gymnastics, Women's Artistic Gymnastics, Rhythmic Gymnastics, General Gymnastics, Sport Aerobics, Trampoline Sports and Sports Acrobatics.

This Policy applies to behaviour occurring both within and outside the course of Springwood Boys and Girls Club's business, activities and events, when the behaviour involves members and negatively affects relationships within Springwood Boys and Girls Club's sport and work environment.

**4. REQUIREMENTS AND RESPONSIBILITIES**

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The requirements and responsibilities of Springwood Boys and Girls Club in application of the Privacy Policy are outlined in the following:

**How we collect personal information?**

To deliver and enhance the services offered by Springwood Boys and Girls Club, certain personal information is collected. Springwood Boys and Girls Club collects personal information from you that you volunteer when:

- You register to become a member;
- You enter a Springwood Boys and Girls Club event or participation program;
- You participate in a Springwood Boys and Girls Club course;
- You purchase Springwood Boys and Girls Club merchandise;
- You request information from Springwood Boys and Girls Club;
- You provide information to one of our staff;
- You participate in one of our surveys.

**How we use personal information?**

We will only collect information that is necessary for us to carry out our primary purpose of providing services relating to: membership, education, events and merchandise.

Your personal information may be used in order to:

- Provide the services you require;
- Internal accounting and administration;
- Regulatory reporting and compliance; &
- Help us to identify and inform you about other products or services that may be of benefit to you.

If we send you any information about services or products you do not require, or you do not want us to disclose personal information to any other organisation, (including related organisations) you can advise us accordingly by writing to our Club Registrar.

If you do not advise us otherwise, you confirm agreement on your own behalf and/or on behalf of others you represent.

If you choose not to provide personal information, we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.

#### **When we disclose personal information?**

We disclose personal information to other organisations that we believe is necessary to assist in providing our services.

The organisations to which we disclose information include:

- Gymnastics Australia
- Gymnastics New South Wales
- Outsourced service providers who manage the services we provide to you, including:
  - Insurers
  - Sport Education Section (Australian Sports Commission)
- Our professional advisors, including our accountants, auditors and lawyers.
- Government and regulatory authorities and other organisations, as required or authorised by law.

We limit the use and disclosure of any personal information provided by us to such organisations for the specific purpose for which we supplied it.

When you provide us with personal information about other individuals, we rely on you to have made them aware that you will or may provide their information to us, the purposes we use it for, the types of third parties we disclose it to and how they can access it.

#### **Storage and security of personal information?**

Springwood Boys and Girls Club stores personal information on a computer database. Your personal information may be held in both paper file and computer file form. We have implemented measure of a reasonable nature to ensure that all personal information about you is securely stored from misuse, loss and unauthorised handling.

#### **Accuracy of personal information?**

We take reasonable steps to ensure that whenever we collect, use or disclose personal information that it is accurate, complete and up to date.

#### **Access to personal information?**

You have the right to access your personal information, subject to some exceptions allowed by law. If you would like to do so, you can gain access to your personal information by contacting our Club Registrar or by writing to Springwood Boys and Girls Club. Alternatively, you may also advise us at any time about possible breaches of privacy, inaccurate, or incomplete personal information.

## **5. POLICY BREACHES AND CONSEQUENCES**

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#### **Procedural Steps**

Springwood Boys and Girls has developed a Complaints Management Procedure and will deal with any complaints about breaches of this Policy promptly, seriously, sensitively and confidentially. These will provide both formal and informal mechanisms for dealing with complaints. At any stage, it is the prerogative of the complainant to proceed with, or dissolve, a complaint.

Springwood Boys and Girls recognises that natural justice is the minimum standard of fairness to be applied in the investigation and adjudication of a complaint.

Disciplinary action will be taken by the Club against anyone who:

- Is found to be in breach of this Policy;
- Victimises or retaliates against a person who has complained of a breach of this Policy; or
- Is found to have made a frivolous or vexatious complaint.

The discipline will depend on the severity of the case and may involve an apology, counselling, suspension, dismissal or other form of action.

## **6. CONFIDENTIALITY AND REPORTING**

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Springwood Boys and Girls Club shall take all necessary steps to ensure the confidentiality of any complaint. Privacy principles require that internal disclosure should be limited strictly to those members who need to have access for official purposes, unless disclosure is:

- Necessary as part of the disciplinary or corrective process; or
- Required by law.

The Springwood Boys and Girls Club management and administration responsible for implementing this policy will keep confidential the names and details of all members and their payments unless disclosure is necessary for entry to competitions, insurance purposes, by Gymnastics NSW, or as part of the disciplinary or corrective process in the event of a breach of policy.

Records retained should be kept for an initial period of 12 months.

If additional information is required the Management Committee shall, after completion of the investigation, provide a written report to the Complaint Committee including:

- a record of the action taken to investigate the formal complaint;
- records of interviews taken;
- information revealed and facts identified;
- a recommendation that the complainant's grievance is valid or otherwise; and
- a recommendation on further action needed to resolve the complaint.

The Management Committee shall formally advise the complainant and respondent of the decision and of steps, which will be taken to give effect to that decision.

Where as a result of a formal grievance it is proposed to take disciplinary action, such action will be carried out in accordance with the Springwood Boys and Girls Club Behaviour Management Policy.