

MODULE 05 - PRIVACY - POLICY

1 POLICY STATEMENT

Swan Districts Gymnastics is committed to providing you with the highest levels of membership service; this includes protecting your privacy. Bound by sections of the Commonwealth Privacy Act (1988) which set out a number of principles concerning the protection of an individual's personal information.

In complying with these laws Swan Districts Gymnastics aims to ensure that we handle personal information responsibly and are consistent in our approach to the collection, use and disclosure of this information. The laws also give the individual rights to access their personal information and to correct it, if needed.

The Swan Districts Gymnastics Privacy Policy contains the following important information the Privacy Act requires us to communicate to all of our customers, regarding the use of your personal information:

- a) Define what is personal information
- b) How we collect personal information
- c) How we use personal information
- d) When we disclose personal information
- e) Storage and security of personal information
- f) Accuracy of personal information
- g) Access to personal information

2. POLICY COVERAGE

1.2. 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.

1.3. What is an organisation?

- a) an individual; or
- b) a body corporate; or
- c) a partnership; or
- d) any other unincorporated association; or
- e) a trust; or

- f) 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.

1.4. What information will be covered?

All personal information gathered by, or on behalf of, Swan Districts Gymnastics for the purpose of managing and enhancing membership.

3. APPLICATION OF POLICY

- i. This Policy applies to all members of Swan Districts Gymnastics; employees, officers, administrators, volunteers, coaches, judges, athletes and officials, and
- ii. This Policy applies equally to Members involved in each of the Swan Districts Gymnastics disciplines.

4. REQUIREMENTS AND RESPONSIBILITIES

The requirements and responsibilities of Swan Districts Gymnastics in application of our Privacy Policy are outlined in the following:

I. How We Collect Personal Information

To deliver and enhance the services offered by Swan Districts Gymnastics, certain personal information is collected. Swan Districts Gymnastics collects personal information from you that you volunteer when:

- a) You register to become an affiliated gymnast;
- b) You register to become an affiliated technical member;
- c) You enter a Swan Districts Gymnastics event or participation program;
- d) You participate in a Swan Districts Gymnastics course;
- e) You purchase merchandise from us;
- f) You request information from us;
- g) You provide information to one of our staff; &
- h) You participated in one of our surveys.

II. 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.

- A. Your personal information may be used in order to:
 - i. Provide the services you require;

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

B. 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 General Manager.

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

D. 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.

III. When We Disclose Personal Information

A. 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:

- i. Outsourced service providers who manage the services we provide to you, including:
 - a. State Association
 - b. Insurers
 - c. Sport Education Section (ASC)
 - ii. Our professional advisors, including our accountants, auditors and lawyers
 - iii. Government and regulatory authorities and other organisations, as required or authorised by law
- B. 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.
- C. 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. This is extremely important for Club owners providing the personal information of their members

IV. Storage And Security Of Personal Information

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

V. 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.

VI. Access To Personal Information

You have a 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 Member Protection Contact Officer or by writing to Swan Districts Gymnastics. Alternatively, you may also advise us at any time about possible breaches of privacy, inaccurate, or incomplete personal information.

5. POLICY BREACHES AND CONSEQUENCES

A. Procedural Steps

Swan Districts Gymnastics undertakes to deal with any complaints of a breach of the Privacy Policy promptly, seriously, sensitively and confidentially. At any stage, it is the prerogative of the Complainant to proceed with, or dissolve, a complaint.

B. Discussion

Should a complaint arise, Swan Districts Gymnastics encourages the Complainant to consider the following options:

- i. Approach the person creating the problem and ask him or her to stop the behaviour
- ii. If the behaviour continues, or it is not possible to approach the person, contact either:
 - a) Coach or General Manager, or
 - b) The Club's Member Protection Contact Officer;

C. Member Protection Contact Officer

If the Complainant decides to proceed, the Member Protection Contact Officer refers the matter to the General Manager for investigation.

D. General Manager

The General Manager determines whether or not to investigate the complaint.

If the General Manager determines to investigate, the Officer:

- i. Informs the alleged wrongdoer;
- ii. Interviews both parties separately;
- iii. Keeps confidential records of the process;
- iv. Attempts mediation to achieve resolution; &
- v. Follows up on the Complainant.

E. External Resolution

- i. If the complaint is not resolved, the Complainant may make a written complaint to an external organisation for mediation or arbitration. This can be done with the support of the Member Protection Contact Officer.
- ii. If the complaint is upheld, a remedy will be prescribed by that external organisation.

6. CONFIDENTIALITY AND REPORTING

Swan Districts Gymnastics administration responsible for implementing this Policy will keep confidential the names and details relating to complaints, unless disclosure is:

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