

 <p>SPORTING WHEELIES AND DISABLED ASSOCIATION</p>	Title:	
	Privacy Policy	
	Policy number: 1.17	Approved by: CEO
	Date Adopted: 24.01.2020	
	Date reviewed: 3.08.2020	Reviewed by: EMT
	Date of next review: 3.8.2023	

1 Purpose

This privacy policy guides how Sporting Wheelies and Disabled Association collects and manages personal information. This policy ensures that we comply with all requirements for how we collect, use, store and disclose personal information in accordance with the Privacy Act 1988 (Privacy Act) and the Australian Privacy Principles. When we use the words 'we', 'us', 'our', we are referring to Sporting Wheelies and Disabled Association.

2 Scope

Sporting Wheelies adheres to the Privacy Act definition of privacy as 'personal information' as any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

This policy applies to all Sporting Wheelies activities and those involved including families, partners, donors, volunteers, board members and staff. Furthermore, this policy applies to written, verbal and electronic forms of information.

The policy also covers health information which is classified as 'sensitive information' and special care is taken in the maintenance and storage of health records and the release or alteration of health information.

We will not provide personal information to any other individuals or organisations without prior consent except where required by law to do so.

At times, we may also disclose information on a confidential basis with:

- contractors who provide services, for example, database management, printing and mailing to Sporting Wheelies
- overseas recipients, such as a medical practitioner, about an individual if they are using our health services and they reside outside Australia.
- emergency services in case of an emergency

In these cases, we will take reasonable steps to ensure to use the information in accordance with the Privacy Act. We will seek consent before any information is disclosed. text

3 Policy Statement: Our commitment

Sporting Wheelies is committed to protecting the privacy and rights of individuals in relation to how we collect, store and use their personal information, their needs and the services we provide them. We want our families, partners, donors, volunteers and staff to have confidence that we have these responsibilities seriously.

To implement this policy, we will:

- Appoint a Privacy Officer to ensure compliance to this Policy. Unless otherwise stated the CEO is the appointed Privacy Officer.

- Provide Sporting Wheelies members, clients, staff, volunteers and supporters with information about their rights regarding privacy.
- Make our privacy policy easily accessible through the enrolment process and on our website
- Store information in a secure password protected program with limited staff access.

We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

4 Procedures

The Australian Government introduced new legislation that came into effect on 21 December 2001 to protect the privacy of individuals. This legislation comprised of 13 National Privacy Principles that apply to private sector organisations. From 12 March 2014, the Australian Privacy Principles (APPs) replaced the National Privacy Principles and Information Privacy Principles and apply to organisations, and Australian Government (and Norfolk Island Government) agencies. You can find out more about these principles by calling the Office of the Australian Information Commissioner on 1300 36 39 92 or through their website at <http://www.oaic.gov.au>.

We abide by the 13 Australian Privacy Principles of:

1. Open and transparent management of personal information
2. Anonymity and pseudonymity
3. Collection of solicited personal information
4. Dealing with unsolicited personal information
5. Notification of the collection of personal information
6. Use or disclosure of personal information
7. Direct marketing
8. Cross-border disclosure of personal information
9. Adoption, use or disclosure of government related identifiers
10. Quality of personal information
11. Security of personal information
12. Access to personal information
13. Correction of personal information

4.1 Collecting personal information

Sporting Wheelies collects personal information which is required in order for us to carry out our work with the community. By providing your information to us you agree that you have provided your indefinite consent to this contact. You may withdraw consent at any time though in doing so we may not be able to provide you with services requested. We collect information from a wide range of stakeholders including:

- Members
- Clients
- Donors
- Supporters
- Staff
- Volunteers

Where practicable, we will collect personal information directly from you or a third party in the following ways:

- you or your representative provide us with your personal information via our website, on the telephone or in person;
- your personal information is provided to us by a third-party authorised by you to do so (e.g. a medical practitioner, community support organisation or government agency);
- you communicate with us by mail, email, telephone or messaging services, or you share information with us via third-party social applications, services or websites; or

- you interact with us on our website or marketing communications, engage us to provide a service, attend one of our events or visit one of our locations.

In addition, when you apply for a job or position (paid or unpaid) with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from recruitment consultants, previous employers and others who may be able to assist us in deciding whether or not to employ you or engage you under a contract. However, this Policy does not apply to acts or practices relating to employee records of current and former employees, which are exempt from the Act.

The types of personal information that Sporting Wheelies collects may include:

- your contact details (e.g. your name, address, telephone number, email address, emergency contact details and other contact details);
- your personal details (e.g. date of birth, sex, residency or citizenship status, insurance details, financial details, employment details and image);
- your sensitive personal details (e.g. gender identity, family background, relationships, culture and communication details, birthplace, language details, ATSI status and DS NMDS data);
- your health information and medical history (e.g. details of any injury, your primary disability, other disabilities, medical condition, medication, medical certificates, health reports, support requirement and assessment summaries);
- your business or company details (e.g. business or company name, address, telephone number, email address, ACN, ABN, TFN, vehicle registration number, accreditation and licence, insurance and financial details);
- your credit card and bank account details;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- Details of the services we have provided to you or that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries;
- Details of donations or purchases you have made from us;
- Additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- Information you provide to us through customer surveys; and
- Any other personal information that we require in order to facilitate your relationship with us.
- Photos or videos.

We collect personal information to communicate our services, operations, activities and objectives, which may include:

- clinical and health support services
- meeting the requirements of government funding for programs and reporting, such as the NDIS and NISQ
- determining appropriate referrals to other services;
- determining billing and invoice requirements;
- processing payments and provide accurate receipts;
- professional and community education
- training services and conferences
- research activities and publications
- events
- ways to support us financially
- employment and volunteering opportunities.

Each time we send a direct marketing communication we will provide a simple way to 'opt out' of receiving similar communications in the future.

If you attend our events you may be photographed or filmed and images and/or audio may be used in various mediums to promote the Association. If you do not wish to be photographed or filmed please tell staff when you attend the event.

4.2 Integrity of personal information

We will take reasonable steps to ensure that the personal information we collect is accurate, up-to-date and complete. The accuracy of personal information depends largely on the information you provide to us.

We recommend that you:

- Inform us if there are any errors in your personal information, and
- Keep us up-to-date with changes to your personal information (e.g. your name or address)

We will take reasonable steps to correct personal information we hold when we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

We will provide you with the opportunity to remain anonymous or use a pseudonym in your dealings with us where it is lawful and practicable (e.g. when making a general enquiry). Generally, it is not practicable for us to interact with you anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in the events, programs and activities we manage or deliver.

4.3 Correcting your personal information

The quality of personal information we hold is important to us, and we have processes in place to monitor it. Where we are satisfied that personal information we hold is incorrect having regard to the purpose for which we are holding it, we will correct it to ensure it is accurate, up-to-date, complete, relevant and not misleading.

You may also request us to correct your personal information at any time. If you wish to request access to your personal information, or to correct it, please contact us initially in writing either by email to mailbox@sportingwheelies.org.au.

We will take reasonable steps to verify your identity before granting access or making any corrections to or deletion of your information. We will not charge you for making your request nor for correcting the personal information.

If we correct or update personal information that has been previously disclosed to another entity, and you request that we notify the other entity of the correction, we will take reasonable steps to give that notification unless it is impracticable or unlawful to do so.

4.4 Health information and other sensitive information we collect

Sporting Wheelies provides an allied health service, and as part of providing our services we collect health information and other sensitive information. Sensitive information we may collect includes personal information such as:

- medical history
- health information.

We seek to limit the collection and use of sensitive information to what is essential. Wherever practicable, we seek consent before we collect this information.

We may also collect personal information from other entities in relation to providing our health services. We will only collect personal information if consent to disclose personal information has been granted.

If we receive unsolicited personal information we will determine whether this information is directly related to our activities and functions. If we determine that this is not the case, we will either destroy the information or ensure that it is de-identified before we store it.

We do not collect, hold or disclose sensitive information for the purpose of direct marketing.

At times we may disclose personal information to overseas recipients, such as a medical practitioner, about an individual if they are using our allied health services and they reside or are traveling outside Australia. We will take reasonable steps to ensure the overseas recipient uses the information in accordance with the Privacy Act. We will seek your express consent before this health information is disclosed.

4.5 Securing your personal information

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. Access by staff to personal or sensitive information is strictly controlled through passwords and documented procedures.

We may hold your information in either electronic or hard copy form. Hard copy information is stored in our offices, which are secured to prevent entry by unauthorised people.

If we hold personal information that we no longer require we will take reasonable steps to destroy the information or to ensure that the information is de-identified. Certain information contained in a Commonwealth record, or information we are required to retain by Australian law, or a court/tribunal order will not be destroyed.

4.6 Disclosing your personal information

Sporting Wheelies will only use or disclose personal information for the purpose it was collected. Sporting Wheelies will not provide your personal information to any other individuals or organisations without your prior consent except where required by law to do so or where that information is provided on a confidential basis to contractors who provide services, for example, database management, printing and mailing to Sporting Wheelies.

4.7 Research, analysis and management, funding and monitoring of our services

We are permitted to collect health information for research which is relevant to public health or safety, analysis of statistics, or the management, funding or monitoring of our health service. We undertake these types of activities in order to improve community health, to educate, to set clinical benchmarks and to encourage people with disability to lead active lives. When we use or disclose personal information for these purposes we will always take reasonable steps to ensure that this information is de-identified. De-identifying information means to remove or alter information, such as name and address that identifies or is reasonably likely to identify you.

4.8 Direct marketing

Direct marketing communication is any information we may send you to tell you about our services, products, fundraising or any other activity which we consider may be of interest to you. In general, we collect this information directly from you, such as when you make a donation to us. These communications may be sent by various means including mail, email, SMS or telephone, according to applicable marketing laws, such as the Spam Act 2003 (Cth).

You may opt out of receiving further direct marketing communications from us by using an opt out facility provided in the direct marketing communication. We seek to make this as simple as practicable and will comply with your request.

You can also opt out at any time by contacting us by email at mailbox@sportingwheelies.org.au.

We do not collect, hold or disclose sensitive information for the purpose of direct marketing.

At times, we may collect, use or disclose personal information collected from a third party, such as a data list provider for direct marketing purposes. We will provide you with an opt out facility in the direct marketing communication and draw your attention to this fact.

If we engage another organisation to assist us in carrying out direct marketing on our behalf we will ensure contractual arrangements with our supplier reflect our obligations under the Privacy Act.

4.9 Using our website and cookies

We may collect personal information about you when you use and access our website. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as the pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use cookies or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your device. They enable us to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser, but our website may not work as intended if you do so.

We may also use cookies to enable us to collect data that includes personal information. For example, a cookie linked to your account is considered personal information under the Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information under this Policy.

4.10 Accessing your personal information

You are entitled to have access to any information relating to you which we hold, except in some exceptional circumstances permitted under the Privacy Act.

You may request access to your personal information, and we will deal with your request as promptly as possible, within a reasonable period. We reserve the right to charge you our reasonable costs incurred in supplying you with access to this information.

If we refuse to grant you access to your personal information, we will provide you with a written notice explaining the grounds for our decision and the avenues available for you to complain about the refusal. Wherever practicable, we will inform you in writing of any steps to assist you that may be taken that would mean that access would not be refused, such as by reframing the request or limiting the scope of your request.

4.11 Contacting Sporting Wheelies

You may contact us at any time if you have any questions or concerns about this Policy or about the way in which your personal information has been handled.

You may make a complaint about the way in which your personal information has been handled to our Privacy Officer using the contact details provided below. We will acknowledge your complaint and respond to you as soon as reasonably possible.

Attention: Privacy Officer
Sporting Wheelies
PO Box 3118, Albion QLD 4010
mailbox@sportingwheelies.org.au
Phone (07) 3253 3333

If you are not satisfied with our response, or you consider that we have breached the APPs or the Act, you can complain to the Office of the Australian Information Commissioner ('OAIC').

5 Other related policies and procedures

- 1.8 Information Management Policy
- 1.18 Confidentiality Policy
- Customer Service Charter
- 2.3 PCI Compliance Policy
- 5.6 Service Commitment Policy
- 5.7 Access to Confidential Information Policy
- 8.1 Employee Recruitment Policy
- 8.5 Code of Conduct Policy

6 Review process

Policy review frequency: Every three years	Responsibility for review: CEO
Review process: EMT	