

## PRIVACY POLICY

Policy number	24-3-24	Version	24-3-24-1
Drafted by	Manager	Approved by BOARD on	10-04-24
Responsible person	BOARD	Scheduled review date	3-2027

### INTRODUCTION

The Board of SouthPort Community Centre is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

### PURPOSE

The purpose of this document is to provide a framework for SouthPort Community Centre in dealing with privacy considerations.

### POLICY

SouthPort Community Centre collects and administers a range of personal information for the purposes of fulfilling requirements for service agreements and funding deeds with local, state and federal governments. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

SouthPort Community Centre recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth) and *Privacy Data and Protection Act 2014 (Vic)*

SouthPort Community Centre is bound by laws which impose specific obligations when it comes to handling personal information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

SouthPort Community Centre will:

- Only collect information that the organisation requires for its primary function;
- As SPCC does not case-manage clients we do not collect and retain health and sensitive information data
- SPCC retains student and participant records for ACFE funded programs for 7 years
- Ensure that participants are informed as to why we collect the information and how we use the information obtained;
- Only use and disclose personal information for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide participants with access to their own information, and the right to seek its correction.

# PRIVACY PROCEDURES

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## PROCESSES

### Collection

SouthPort Community Centre will:

- Only collect information that is necessary for the performance and primary function of SouthPort Community Centre.
- Collect personal information from the person themselves wherever possible.
- Notify participants about why we collect their personal information and how it will be used.
- Advise a person before obtaining information about them from a third party.
- Only collect sensitive or health information with a person's consent.

### Use and Disclosure

SouthPort Community Centre will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- Prior to using personal information for another purpose, such as such marketing or promotion, SouthPort Community Centre will obtain consent from the person about whom the personal information relates.
- use personal information of client for direct marketing, only when consent is given.
- Provide individuals access to their own personal information except where to do so would pose a serious threat to life or health, or to refuse is authorised by law..

### Storage

SouthPort Community Centre will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.
- Ensure personal information systems - including all physical and online storage systems - have sufficient security.
- Ensure that SouthPort Community Centre data is up to date, accurate and complete, as per DHHS and funder guidelines.

### Data Security and Retention

### Destruction and de-identification

SouthPort Community Centre will:

- Destroy personal information once it is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if requested by the person about whom the information relates.

### **Data Quality**

SouthPort Community Centre will:

- Retain personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.
- Only destroy records in accordance with the policy outlined below.

### **Openness**

SouthPort Community Centre will:

- Ensure participants are aware of SouthPort Community Centre's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

### **Anonymity**

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

### **Making information available to other organisations**

SouthPort Community Centre can:

- Release information to third parties where it is requested by the person concerned.