PURPOSE

Rosanna Fire Station Community House (RFSCH) 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.

The purpose of this document is to provide a framework for Rosanna Fire Station Community House in dealing with privacy considerations in line with State and Commonwealth privacy legislation.

POLICY

This policy explains how Rosanna Fire Station Community House collects, uses, discloses and otherwise handles personal information.

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

Rosanna Fire Station Community House will collect only what personal information is required for its operations and will do so lawfully and fairly. Stakeholders will be told why their information is collected, in what form and how it is stored. They will be able to see their information and correct it. Information will be kept accurate, complete, up-to-date and secure.

RESPONSIBILITIES

The Committee of Management of Rosanna Fire Station Community House is responsible for developing, adopting and reviewing this policy.

The Coordinator of Rosanna Fire Station Community House is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

PROCESSES

Collection Rosanna Fire Station Community House will:

- Only collect information that is necessary for the performance and primary function of Rosanna Fire Station Community House.
- Notify stakeholders about why we collect the information and how it is managed and protected
- Notify stakeholders about this policy on the website, the enrolment form, health form and volunteer application form about the Rosanna Fire Station Community House Privacy Policy and who to contact about their personal information or about complaints
- Reasons and ways in which personal information is collected includes:
    - To enrol participants in courses and childcare-currently using enrolment forms, class booking sheets and a computer database
    - Processing payments for courses and childcare
    - For purpose of contacting participants about fees and cancellation of classes or courses
    - For purpose of sending out course information, newsletters or other information about events at the House to participants - you can choose not to receive this information
    - Collecting health information for participants enrolled in classes for people with disabilities and other classes e.g. health and fitness - participants complete a form-for tutor/instructor use only
    - Meeting reporting requirements for funding bodies- information is entered into a computer database (VETtrak compliant student data management system or ACE (for HACC reporting for people below age 65) or DEX (Data exchange for Dept of Social Services for Commonwealth Home Support Program for people age above 65)and sent to funding bodies in an encrypted format
    - Employing staff and tutors and engaging volunteers and this may include your application, including your cover letter, resume, contact details and referee reports. Additional information when employed- emergency contacts, qualifications, bank details for payment, superannuation and tax information. Additional information when volunteering- emergency contacts
    - Membership- register of members is kept in accordance with the Association Rules in line with the Associations Incorporation Reform Act 2012
    - Donations to Rosanna Fire Station Community House- with the right to maintain anonymity
    - Website- name and email so RFSCH can follow up enquiries
    - Complaints and Injuries and Incidents- so that your complaint, injury or incident can be followed up
    - Surveys, Course evaluations- only if you wish to provide information for follow up

- **Sensitive Information-** is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and generic information and information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record and some types of biometric information**.**

  Rosanna Fire Station Community House only collects sensitive information where it is reasonably necessary for our functions or activities and either:

  - the individual has consented; or
  - we are required or authorised by or under law (including applicable privacy legislation)to do

Use and Disclosure

Rosanna Fire Station Community House will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, Rosanna Fire Station Community House will obtain consent from the affected person.
- Information which is collected for statistical purposes to comply with reporting requirements for funding bodies will not contain any identifying information
- Personal information will never be disclosed to other participants, tutors, staff, Committee, organisations, visitors unless:
  - there is a serious and imminent threat to an individuals' life, health, safety or welfare or
  - a serious threat to public health, safety or welfare or
  - organisation required or authorised by or under law
  - Australian Security Intelligence Organisation (ASIO) or the Australian Secret Intelligence Service (ASIS), in connection with its functions, has requested Rosanna Fire Station Community House to disclose personal information

Data Quality

Rosanna Fire Station Community House will:

- Take reasonable steps to ensure the information the organisation collects is accurate, complete, up to date, and relevant to the functions we perform.

Data Security and Retention

- Rosanna Fire Station Community House will:
  - Safeguard the information we collect and store against misuse, loss, unauthorised access and modification.
  - Records containing personal information will be kept as required by law and practice as follows:

- Learn Local/ACFE, HACC, enrolment and student evaluation forms for 2 years
- Childcare enrolment forms, Sign In/Sign Out (attendance), medication, accidents, injury and illness, behaviour and development, complaints and time sheets and rosters for 25 years from last contact
- Health Forms- for as long as a participant is enrolled in an exercise class and each year as new forms are given to participants to complete
- Class Booking Sheets will be kept for 7 years
- Class Rolls will be kept for 1 year
- Financial records and staff records for staff other than childcare staff 7 years

- **Personal information** will be stored as follows:
  - **Hard copy records** will be kept in the storeroom of the Administration Office, which only is accessed by paid staff and is locked and alarmed after hours. These records include:
    - **Childcare**- non-current Childcare Enrolment Forms and sign in/sign out sheets
    - **Financial records**
    - **Class Booking Sheets**
  - **Health information** which is collected for health and fitness classes will be kept in the tutor's folder, is only for the tutor's use and will be kept in the office except during class time when the tutor will have the folder.
  - **Staff** and **Tutor records**, **HACC**, **ACFE Enrolment** and **HACC**,**ACFE Learner Surveys, Complaints Register** and **the Injury and Accidents Register** will be kept in the front Administration Office, which is only accessed by paid staff or volunteers with staff present. Office is locked and alarmed afterhours.
  - Information cannot be modified except by authorized staff.
  - Personal information kept on our computers is secured as follows:
    - Data encryption, firewalls, anti-virus software and password protection
    - Computers are kept in offices which are only accessed by authorised staff and volunteers and offices are locked and alarmed after hours.

Preventing Data Breaches

RFSCH recognises that the access to or disclosure of personal information can result in serious harm for the individual including, but not limited to financial, emotional, physical or reputational loss or damage. RFSCH will take all reasonable steps to prevent misuse, interference, loss, unauthorised access, modification, or disclosure. Data breaches may occur through many avenues including IT resources, personnel disclosure or unauthorised access to information, breach of confidentiality. The Coordinator and CoM shall review and implement strategies to protect this personal information and shall train staff in the implementation of these strategies. Strategies in place to protect and prevent these breaches include:

- Restricting access to personal information
- Limiting remote access to devices (except where authorised)
- Wi-fi network and cloud protection

- Access to electronic devices requires a PIN, password (using letters, numbers, punctuation or symbols) or encryption code
- Antivirus and malware protection for the server
- Server back-ups in case of system failure or natural disaster
- Regular updating of software to ensure that it is up to date
- Avoid sending personal information through email (where possible)
- Information which is no longer required to be kept shall be destroyed (subject to other legal obligations)
- Physical files containing personal information are kept in a lockable storage area.

- **Website security**-While Rosanna Fire Station Community House strives to protect the personal information and privacy of users of our website, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact Rosanna Fire Station Community House by telephone or post.

- **Third party websites**- links to third party websites that are not operated by Rosanna Fire Station Community House are provided for your convenience. Rosanna Fire Station Community House is not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

Openness

Rosanna Fire Station Community House will:

- Ensure stakeholders are aware of Rosanna Fire Station Community House's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

Rosanna Fire Station Community House will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

Anonymity

Rosanna Fire Station Community House will:

- Give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.
- Wherever it is lawful and practicable, individuals have the option of not identifying themselves when entering transactions with Rosanna Fire Station Community House-for example, making a phone enquiry

Making information available to other organisations

Rosanna Fire Station Community House can:

- Only release personal information about a person with that person's express permission. For personal information to be released, the person concerned must sign a release form.
- Can release information to third parties where it is requested by the person concerned.

Confidentiality Statement

All staff, tutors, Committee members and volunteers on appointment will be asked to sign a "Confidentiality Statement" to ensure the privacy of all House participants (including childcare families)

Privacy Statement

A Privacy Statement will be given to all House participants (including childcare families) on enrolment. This will be signed by participants as required.

Complaints

Any complaints regarding your privacy must be referred to the Manager (Privacy Officer) in writing in person or email to: office@rfsch.org.au, stating:

- the circumstances of the matter you are complaining about
- how you believe your privacy has been interfered with
- how you believe your complaint should be resolved

If you are unhappy with our response you can refer your complaint to:

Victorian Privacy Commissioner 1300 666 444

Office or the Australian Information Commissioner 1300 363 992 or enquiries@oaic.gov.au

RELATED DOCUMENTS

- Complaints Handling Policy

Authorisation

Name of President	
Signature of President	
Date of approval by the Committee	