



WESTERN AUSTRALIAN BRANCH

POLICIES and OPERATIONAL PROCEDURES MANUAL

Updated – 13-Jan-05

P6. PRIVACY POLICY.

Introduction.

The Scout Association of Australia, Western Australian Branch, (“the Association”) has always respected the privacy of its members and customers and understands the importance placed on the protection of personal information in its care.

The Association’s commitment to protecting privacy is important to it. Personal information provided to the Association will not be used in any way that is not intended it to be used, and that the data will be held securely.

The Privacy Policy:

- complies with the National Privacy Principles embodied in the Privacy Act 21 December 2001. It explains how the Association collects personal information and how it maintains, uses and discloses that information,
- outlines the individuals privacy rights along with general rights and obligations, as well as explaining how an individual can access the information the Association keeps about members and how an individual can update their own database records,
- is binding on all staff and volunteer members as well as all levels within the State from the Branch Office/Headquarters down to the local formations of the Association in W. A.

Primary purpose definition.

Personal information is collected and retained on past and present adult members, as well as youth members and their parents/guardians, for the primary purpose of operating the Association.

All information collected is directly applicable to the functions and activities of Scouting in Western Australia, and to the health, well being and protection of its members.

This information is entered and stored in a centralised database located at the Branch Office. Data may also be retained in electronic or hardcopy format by any formation of the Association to which the individual member belongs.

Collection of data.

The Association will only collect personal information in a fair and lawful manner, and then only that information which it requires to manage and promote the organisation.

When a person applies for membership:

- the application form includes statements about privacy and requests for consent. Those privacy statements refer to this policy where more detail is available on how any information about the members may be used and disclosed in relation to their membership of the Association.
- the applicants consent to the Association collecting, maintaining, using and disclosing personal information about themselves as provided by themselves or by another person in accordance with this policy.
- the Association collects information on each form in its register and the information required is only used in the administration of the Association for the express purpose of the requested information. Records of the information are included in Policy document P8

Privacy Policy Audit. The Audit document details a listing of all information collected in relation to each form, including a record of the latest version of the form, so that at all times a current record is maintained on the justification for the collection of the information. Information not required for the specific purpose for the usage of the form will not be requested.

Identifiers.

When a person applies for membership of the Association., or makes application to attend one of the many training courses offered to members, they are assigned a computer generated number to uniquely identify them for the purposes of the Association's operations. This number has no relationship to any identifier assigned by any other agency.

Type of data collected.

Generally, the Association only collects personal information about the member from themselves, unless it is not reasonable or practical for it to do so or the member consents. For example, the Branch Office may collect information about a member from their local Scout Group to whom they have applied to be a member. It does not collect or store information about the member from individuals or organisations not connected with Scouting.

Membership application forms generally request information that identifies the member, such as their full name and date of birth; and information that enables contact to be made such as address, phone and fax numbers, as well as an email address. Other questions may include but not limited to the name of the school attended or, if employed, occupation, position, employer's name and address. It is often handy to maintain information about hobbies and interests and whether individuals possess any other skills that may be of use to the organisation.

Information is collected from internal sources and from members, information related to events and activities they attend, training courses, appointments and qualifications related to Scouting.

In the case of youth members it is important to know the names and contact details of parents/guardians in case of need to contact them in an emergency, or to ensure they are informed about Scouting activities, policy issues or other important matters involving their children. As the Association relies on volunteers providing their time and expertise in a variety of areas for the benefit of our youth program it also asks for occupation & employer details as well as any skills & hobbies and sporting & leisure activities. Parents/guardians are asked about their willingness to support their children's activities and help out with their local Scout Group in whatever capacity they can.

Sensitive data.

Scouting is a voluntary, non-political, non-formal education movement for young people, open to all without distinction of origin, race or creed whose aim is to encourage the physical, intellectual, social and spiritual development of young people.

As an organisation it does not actively seek to collect sensitive information (for example health information or information about racial or ethnic origins or any criminal record), unless it is necessary to satisfy the aims and principles of our organisation, or is for the care and protection of our members. In the event that information is held on any of these areas then extremely limited access is provided to selected senior persons within the Association in a case of need to know only.

The following information, which may be considered to be of a sensitive nature, is collected but the Association does so in accordance with the National Privacy Principles:

- Requests such as place of birth, nationality and whether the individual is of a non-English speaking background is made in order for the Association to identify any special needs of members from different cultures.
- Religion/denomination (if applicable) is requested so that the Association can provide for the needs of members from different religious backgrounds.
- For adult leaders requests are made for their marital status and their partner's name for the purposes of inviting partners to Scout functions & activities and to incorporate them as much as possible in the 'Scouting family'.
- Information obtained from the Western Australian Police Service as a result of National Criminal Record Checks on potential adult members is strictly confidential, is not held electronically in any form, and is securely stored and may be accessed only by the General Manager, Chief Commissioner and Branch Commissioner – Adult Training in a case of need.
- Behavioural files are maintained where appropriate and these are directly under the control of the General Manager. Reasonable access by the member to their file is available on request to the General Manager.
- Information is collected on health and medical status, including Medicare and private health fund numbers, about youth members at the time of applying for membership, as well as each time the young person wishes to attend a Scouting activity and accordingly the Association seeks parent/guardian permission for more up to date data to be supplied. This data provides the organisation with relevant medical information that is essential to the duty of care it owes to the young people under its care.
- Health and medical information is also sought from adult members attending major activities and events for use in medical situations.

Consent policy.

When a person applies to join the Association, they agree:

- that it may use contact/personal details to distribute information about the organisation, its activities and services that are considered may be of interest to the member, and to contact members from time to time to obtain feedback about its activities and services,
- to the collection of sensitive data for the purposes disclosed in this policy.

The Association will not use any personal information for any purpose that the member would not reasonably expect it to use it for. Members' information may be used to offer them other products, services and activities that will enhance the relationship between it and the member. A member may decide on joining, and at any other time by informing the Association formally in writing, that they do not wish to be contacted in this way. It is assumed that existing members have given consent unless they advise otherwise.

Use and disclosure.

By signing the membership application form the member consents to the Association using their personal information in the following way - To:

- maintain a register of its membership,
- respond to the members request or help it process any request for its activities or services,
- effectively administer all activities and services that it provides to the member,
- communicate with member about the activities and services that it may provide them,
- inform members of relevant internal or external activities, events, promotions or special offers that may be of interest to them,
- identify geodemographic details of membership for the purpose of building membership,

- ensure the safety, health and well-being of all members while they participate in Scout activities,
- carry out research, marketing or development of our products, activities and services including the surveying of members on their needs and attitudes,
- provide contact information to enable communication between members of the movement,
- assess the suitability of adult members to be in charge of our youth members,
- provide personal details of potential Adult Leaders to the Western Australian Police Service for criminal record checks in accordance with Association Child Protection Policy
- direct membership inquiries to the Leader in charge of a formation,
- direct inquiries to the Leader in charge of a formation regarding the use, or hire, of a Scout property if the person has been appointed for that purpose (this includes listing name and contact details on the Scout website),
- assess, process and investigate claims made under any insurance products the Association provides to members.

If a member chooses to provide the Association with their email address, that address may be used to advise that member of matters of Scouting interest as well as for marketing, planning, new services or research purposes. Members have the right to opt out of these additional communications. There is also an opportunity to opt in by joining email subscription lists which will be promoted through emails and the website.

The Association may release information about the member where there is a duty to the public to disclose that information, or where disclosure is required or authorised for law enforcement or regulatory purposes.

The Association undertakes to give proper and responsible consideration to privacy issues associated with the introduction of new marketing methods or technology.

Data quality and integrity.

The Association relies on the accuracy of the information that members, or their formation, provide to it. It attempts to ensure that all information that it collects, uses or discloses is accurate, complete and up to date. Furthermore, periodic internal checking procedures are conducted to ensure that as far as is practicable that the data held by us is accurate and current.

Members should promptly notify the Association if there are any changes to their personal information.

Data access and correction.

Members can request access, at any time, to personal information that it holds about themselves. All requests will be processed within a reasonable time, usually 14 days.

There is no fee for requesting access to or updating a member's information.

Before giving access to any member, or amending their records, either in person or over the phone, the Association may require proof of identity. It may ask you to verify such details as it considers appropriate such as, but not limited to, full name, membership number, date of birth and address.

From time to time, for the purposes of data correction, the Association may provide members or their formation with a computer printout of some or all personal data that it holds on a member.

A 'Change of Personal Particulars' form to allow members to advise the Association of any amendments.

Many forms other than the membership application form are used by the Association for various operational purposes. These forms often request personal details from members which were previously collected from their original membership application. These provide the Association with further opportunities to ensure its data is accurate and current.

Any amendments to member's records will be processed as soon as possible after such reports or forms are returned to the Branch Office.

Access to data by members of the Association.

Scouting is essentially an organisation that is run by, and for, its voluntary members. Communication between members is of primary importance for its successful operation. The provision of contact details to members to allow them to make contact with other members is very important.

The provision of some personal details about members to Leaders, whose role is to supervise and in some cases assess the performance of those members, is also essential.

For these reasons, the Branch Office staff are authorised to provide limited personal information about a member to another member for bona fide purposes, and these authorisations are provided by the General Manager. As a general rule the does not disclose the member's work details.

The Association also publish a contact list showing limited personal details for a select list of senior adult members. This list is provided to all those on the list for contact purposes.

Access to data by non members.

Access to personal information by non-members, except custodial parents/guardians, is not permitted. Personally identifiable data is not provided to third parties or non-members.

Data security.

The Association takes all reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure.

It has physical, electronic and procedural safeguards to protect information that is held by the Branch Office. For example, personal information in the form of original or copies of paper forms is stored in secured premises at the Branch Office. Forms may also be held by authorised voluntary Adult Leaders at formations. These Leaders are accountable for the security and privacy of individual data.

The Branch Office is the sole location of the data held in electronic databases. Branch or District Commissioners and other approved personnel may have dial up access to those databases in the future. Read-only and change access to information stored electronically is restricted to personnel whose role in the Association requires access. All authorised personnel require logins and passwords for access. The Association require all staff and volunteers to maintain the confidentiality of customer and member information.

The database is backed-up on tape on a daily basis and the tapes are either securely stored or moved off-site overnight.

Any visitor, for any purpose, to any part of the Branch Office, and in particular, in which customer personal information is kept is required to be accompanied by a member of staff while on the premises.

The Branch Office uses secure methods to destroy or de-identify any personal information such as computer reports as soon as the information is no longer needed by it for any purpose. However, current policy is that electronic information on the membership database on past members is not removed or archived.

Commercial use of data.

There are occasions when external organisations or individuals wish to offer a product or service to members which are considered would be beneficial or of interest.

Subject to the approval of the organisation, and the material to be sent to members, and a signed agreement between Association and the organisation regarding data confidentiality, the Branch Office may provide mailing data in a secure format to that organisation, or to a mailing house on their behalf.

As with most organisations, the Association relies on third party suppliers to conduct specialised activities such as bulk mail outs, data processing, printing etc. These agents act on behalf of the Association and do not facilitate their own commercial agendas whilst processing members' personal information. While personal information may be provided to these agents to enable them to perform their agreed tasks, such information remains the property of the Association at all times and the agent organisations involved are bound by specific confidentiality, non-disclosure agreements and data disposal protocols.

The Association, its suppliers and partners also abide by the Australian Direct Marketing Association (ADMA) Code of Ethics in relation to all direct marketing and electronic marketing to members.

Website on-line services policy.

The Association does not collect any personal information about members via our Internet site except when they knowingly provide it.

It is possible for members to visit this website without telling the Association who they are.

If members have elected to be a registered user the Association may use an e-mail address to send them various promotional offers, from time to time, Scout program information, special events or other marketing communications that may be of interest to members.

It is the Association policy to only email customers who give us permission to do so. If it sends members an email for a commercial purpose, it will give them the option of not receiving further communications of this nature. Members may also opt in to the email subscription service to receive emails about specific subjects and activities.

Personal information obtained on the site will never be released to a third party without the members' consent. Any information collected is to be used to improve service to users, and from time to time may contact registered users about new features and improvements to the website.

The Association undertakes to take reasonable steps necessary to ensure that member information is secure from any unauthorised access or disclosure. In designing the Association's website, it has

incorporated security procedures and practices that are considered consistent with Australian industry practice. Security procedures are reviewed from time to time and update them when relevant.

The Association assume no responsibility for the information practices of third-party sites where a user is able to access their sites through its site. Furthermore the Association encourage users to review each site's privacy policy before disclosing any personally identifiable information.

For statistical purposes the Association may collect non-personalised information on website activity (such as the number of users who visit the website, the date and time of visits, the number of pages viewed and navigation patterns) through the use of 'cookies' and other tracking technology. In order to collect user statistics it may anonymously log information, and identify categories of users by items such as domains and browser types.

The Association may amend this policy from time to time, and, if substantial changes in the way that personal information is used it will notify members by posting a prominent announcement on our web pages, and via an email to registered users.

If any member has any questions or feedback on the website privacy policy please send an email to: email@wa.scouts.org.au

Members rights.

Members need not give the Association any of the personal information about themselves or any other person which may be requested in communications with them. However, without that information, the Association may not be able to process an application, fulfil requests to become a member or provide members with an appropriate level of service.

Accordingly, member are entitled to ask the Association for access to their personal information records at any time, or to choose to cancel or opt-out of any service or future mailing.

Members may elect to advise the Association that phone and fax numbers provided to it are to be marked as 'silent' in which case it will not release or publish them in any form.

Complaints resolution.

Complaints will be resolved in accordance with the the Association's Conflict Resolution Procedure. Complaints should be made in writing or by email to the General Manager.

Changes to the privacy policy.

This information relates to current privacy standards. The Association may vary its privacy standards from time to time, and, accordingly members will be notified of these changes by publishing them on the website.

Authority: