



## INFORMATION PRIVACY POLICY

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<b>Approved by:</b> Ben McDonald (President) and Sorrento Cricket Club Committee
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<b>Policy Owner:</b> Sorrento Cricket Club

## **PURPOSE**

To ensure that all Club Officials who are responsible for handling personal and/or health information do so in a manner that protects every individual's right to privacy.

## **POLICY**

**Sorrento Cricket Club's Committee and Officials** are fully committed to protecting everyone's right to privacy. Club officials in collecting information will comply with all aspects of the Victorian Information Privacy Act 2000 and the Health Records Act 2001. This Privacy Policy sets out how Sorrento Cricket Club (SCC) manages personal information provided to or collected by it.

It is the SCC Committee's responsibility to ensure that relevant Club Officials are familiar with their obligations under the Acts and that the handling of both personal and health information is done so in accordance with the law.

In particular:

- SCC will only collect personal and health information that is required for its activities.
- Information will only be used for the purpose for which it was collected.
- If information is required for other purposes other than those for which it was collected, agreement will be sought beforehand.
- Information will only be accessed by Team Officials and Committee Members.
- Information will be securely stored.
- Information will be destroyed if it is no longer needed for any purposes.

### **Personal information collected by SCC and how it is collected:**

SCC collects and holds personal information, including health and other sensitive information, about:

- *players and parents and/or guardians before, during and after the course of a player's membership at the SCC including:*
  - name, contact details (including next of kin), date of birth and gender
  - medical information (e.g., details of disability and/or allergies, and details of any assistance the player receives in relation to those disabilities, medical reports, names of doctors)
  - conduct and complaint records, or other behaviour notes
  - health fund details and Medicare number
  - volunteering information (including Working With Children Checks)
  - photos and videos from games and events.
- *Club official applicants, volunteers and contractors, including:*
  - name, contact details (including next of kin), date of birth
  - medical information
  - photos and videos at events
  - emails and private emails (when using SCC email address)
  - other people who come into contact with the SCC, including name and contact details and any other information necessary for the particular contact with the SCC.

**Personal Information you provide:** The SCC will generally collect personal information held about an individual by way of forms filled out by Parents or players, face-to-face meetings and interviews, emails and telephone calls.

**Personal Information provided by other people:** In some circumstances the SCC may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another club.

#### **Use of personal information you provide**

SCC will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented. E.g. sharing contact details amongst team members or their parents for transport pooling.

**Players and Parents:** In relation to personal information of players and Parents, the SCC's primary purpose of collection is to enable the SCC to provide opportunity for players registered at the SCC to play cricket as part of the Mornington Peninsula Cricket Association, exercise its duty of care and perform necessary associated administrative activities which will enable players to take part in all the activities of the SCC. This includes satisfying the needs of Parents, the needs of the player and the needs of the SCC throughout the whole period the player is registered at the SCC.

The purposes for which the SCC uses personal information of players and Parents include:

- to keep Parents informed about matters related to their child's participation, through correspondence, newsletters and magazines
- day-to-day administration of the SCC
- looking after players' social, emotional and medical wellbeing
- seeking donations and marketing for the SCC
- to satisfy the SCC's legal obligations and allow the SCC to discharge its duty of care

In some cases where the SCC requests personal information about a player or Parent, if the information requested is not provided, the SCC may not be able to register or continue the registration of the player or permit the player to take part in a particular activity.

**Club Official applicants, volunteers & contractors:** In relation to personal information of Club Official applicants, volunteers and contractors, the SCC's primary purpose of collection is to assess and (if successful) to engage the applicant, or contractor, as the case may be.

The purposes for which the SCC uses personal information include:

- for insurance purposes
- seeking donations and marketing for the SCC
- satisfying the SCC's legal obligations, for example, in relation to child safety legislation.

**Marketing and fundraising:** The SCC treats marketing and seeking donations for the future growth and development of the club as an important part of ensuring that the SCC continues to provide a quality sporting environment in which both players and club official's thrive. Personal information held by the SCC may be disclosed to organisations that assist in the SCC's fundraising.

Parents, players, contractors and other members of the wider SCC community may from time to time receive fundraising information. SCC publications, like newsletters and magazines, which include personal information and sometimes people's images, may be used for marketing purposes.

#### **Who SCC might disclose personal information to and store your information with**

The SCC may disclose personal information, including sensitive information, held about an individual for administrative and support purposes. This may include to:

- third party service providers that provide document and data management services, training and support services, hosting services, and software-as-a-services
- communications with Parents

- another MPCA Club including to its club officials to facilitate the transfer of a player
- health service providers
- recipients of SCC publications, such as newsletters and magazines
- player's parents or guardians and their emergency contacts
- anyone to whom you authorise the SCC to disclose information
- anyone who we are required or authorised to disclose the information to by law, including child protection laws.

The SCC may from time to time use the services of third party online service providers (including for the delivery of services and third party online applications, or Apps relating to email, instant such as Google's G Suite, including Gmail) which may be accessible by you. Some personal information [including sensitive information] may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.

SCC personnel and the SCC's service providers may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering the system and services ensuring their proper use.

The SCC makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed and stored outside Australia, in connection with any cloud and third party services.

### **SCC's treatment of sensitive information**

In referring to 'sensitive information', the SCC means: information relating to a person's racial or ethnic origin, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

### **Management and security of personal information:**

SCC's Club Officials are required to respect the confidentiality of players' and Parents' personal information and the privacy of individuals.

The SCC has in place steps to protect the personal information the SCC holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records. This includes responding to any incidents which may affect the security of the personal information it holds. If we assess that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, we will notify them and the Office of the Australian Information Commissioner of the breach. Information shall be archived for 3 years and when it is not required for any purpose, will be destroyed securely by shredding. Where consent is not given to distribute information, the member's details will be stored securely in a separate file to avoid error.

It is recommended that parents and the SCC community adopt secure practices to protect themselves. You should ensure that all passwords you use are strong and regularly updated and that your log in details are kept secure. Do not share your personal information with anyone without first verifying their identity and organisation. If you believe any of your personal information has been compromised, please let the SCC know immediately.

### **Access and correction of personal information:**

Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information and health records respectively which the SCC holds about them and to advise the SCC of any perceived inaccuracy. Players will generally be able to access and

update their personal information through their Parents, but older players may seek access and correction themselves.

There are some exceptions to the access rights set out in the applicable legislation.

SCC respects every Parent's right to make decisions concerning their child.

Generally, the SCC will refer any requests for consent and notices in relation to the personal information of a player to the player's Parents. SCC will treat consent given by Parents as consent given on behalf of the player and notice to Parents will act as notice given to the player.

To make a request to access or to update any personal information the SCC holds about you or your child, please contact the SCC President or SCC Secretary by telephone or in writing. SCC may require you to verify your identity and specify what information you require. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.

There may be circumstances where the reason for refusal is not provided, if doing so may breach the privacy of another person or where the release may result in a breach of the SCC's duty of care to the player.

### **Enquiries and complaints**

If you would like further information about the way the SCC manages the personal information it holds about you or wish to complain that you believe that the SCC has breached its privacy obligations, please contact the [SCC Secretary – [secretary.scc2@gmail.com](mailto:secretary.scc2@gmail.com) ] by writing or telephone at **(03) 5984 2571**. The SCC will investigate your complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.