



GIRL GUIDES
A U S T R A L I A

Governance Documents

Volume 2: Policies

2.2.1: Privacy Policy

[Board approved, 3 May 2015]

Privacy Policy

Girl Guides Australia and State Girl Guide Organisations must at all times comply with the 13 Australian Privacy Principles (APP) as described in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

The Board has a *Privacy Policy* to ensure that Girl Guides Australia and State Girl Guide Organisations are adhering to the Australian Privacy Principles.

The intent of this policy is to ensure that the privacy of our members are respected and that personal information is appropriately protected.

In developing its policy the Board addressed the following matters:

- Types of information collected - Personal;
- The way that Girl Guides collects and holds personal information;
- The purpose for which Girl Guides collects, hosts, uses and discloses personal information;
- Commercial Use of Data;
- The method by which a member of Girl Guides accesses personal information about them, that is held by GGA or a State Girl Guides Organisations and seek corrections to that information;
- Raising complaints;
- Disclosure of personal information to overseas recipients; and
- Declaration of countries that we disclose information to

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1. About this Document

Purpose

The purpose of this document is to outline the policy of Girl Guides Australia (GGA) in relation to Privacy. This Policy is intended to define the standards and scope of practice of Australian Girl Guides as it relates to Privacy of our members and the data that Girl Guides Australia, and State Girl Guide Organisations hold, collect and report on.

This document does not limit the powers or duties of GGA.

Approval by the Board

This document has been approved by the Board.

Review

The Board will ensure that this document is reviewed by 31st July 2017.

Amendment

The Board may amend this document at any time.

Responsibility

Responsibilities under this policy are:

Position	Responsibility
Board	Policy owner
CEO	Executive Office oversight, policy review
Nominated Privacy Officers	Policy implementation, maintenance of registers

Document Management

Approval and Change History

This table summarises the changes to and approval of this document. While the document is reviewed at least annually, it is only subject to approval if changed.

Version	Author	Date	Approved By	Comments
1	CEO	03/12/2014	GGA	Initial document creation
2		03/05/2015	GGA BOARD	BOARD APPROVAL

2. Objectives

Privacy Standards

Girl Guides Australia and State Girl Guide Organisations must at all times comply with the 13 Australian Privacy Principles (APP) as described in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012..*

Principle

The Board has a *Privacy Policy* to ensure that Girl Guides Australia and State Girl Guide Organisations are adhering to the Australian Privacy Principles.

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In developing its policy the Board addressed the following matters:

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- Declaration of countries that we disclose information to

This policy is binding on all staff and volunteer members as well as all entities within the organisation whether at Unit, District, Region or State level, and including all events and activities that are formally undertaken on behalf of the Australian Girl Guide movement (including overseas events and activities).

This information relates to our current privacy standards. We may vary our privacy standards from time to time. Notification of these changes will be placed on the Girl Guides Australia website only.

3. Types of Information that we collect and hold -

What information do we collect?

Our membership application forms generally request information that identifies you, such as your full name and date of birth; and information that enables us to contact you, such as address, phone and fax numbers and email address. We may also ask for the name of your school or, if employed, your occupation, position and employer's name and address. We also like to know your hobbies and interests and whether you have any other skills that may be of use to the organisation.

We also collect from internal sources, and from members, information related to events and activities you attend, training courses, appointments and qualifications related to Guiding.

In the case of youth members, we also need to know the names and contact details of your parents/guardians in case we have to contact them in an emergency, or to ensure they are informed about Guiding activities, policy issues or other important matters involving their children. We may also ask for their occupation/employer details as well as their skills/hobbies and sporting/leisure activities, as our organisation relies on volunteers providing their time and expertise in a variety of areas for the benefit of our youth program. We ask parents/guardians about their willingness to support their children's activities and help out with their local Guide Unit in whatever capacity they can.

Sensitive Information

We do not actively seek to collect sensitive information (for example health information or information about your racial or ethnic origin 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.

The following information, which may be considered to be of a sensitive nature, is collected by us, but we do so in accordance with the Australian Privacy Principles:

- Your place of birth, nationality and whether you are of a non-English speaking background is requested in order for us to identify any special needs of members from different cultures. We also ask our potential members about their Aboriginal and Torres Strait Island background for similar reasons.
- We request "next of kin" information for both our Youth and Adult members to ensure that we have contact details that our organisation can use in cases of emergency. This information is held electronically, stored securely and only accessed in case of emergency.
- We ask for parent/guardian contact details for our youth members to assist Girl Guides in communicating with our families regarding activities, events, policies and procedures of our organisation. This information is held securely, electronically, and only utilised by the State Girl Guide Organisation of whom the Guide is a member.
- Information obtained by the Criminal History Check that is drawn from the State-specific authority regarding potential adult members is strictly confidential, is held electronically and is securely stored.

- We collect health and medical information, including Medicare and private health fund numbers, about youth and adult members and provides the organisation with relevant medical information that is essential to the duty of care that we owe members under our care.

4. How Girl Guides collects and holds personal information

When it is reasonable, practicable, fair and lawful

Generally, we only collect personal information directly from you, unless it is not reasonable or practical for us to do so, or in situations where we have your consent to do so. For example, State Girl Guide Organisations may collect information about you when you apply to be a member. From time to time we will need to collect information about our members as it relates to our duty to ensure compliance with Child Protection policies across Australia.

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 Girl Guides.

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

This information is entered and stored in a centralised database, which can only be accessed by the relevant State Girl Guide Organisations. Data may also be retained in electronic or hardcopy format by any entity within the organisation to which the individual member belongs.

We only collect personal information in a fair and lawful manner, and then only that information which we require to manage and promote our organisation.

Consent on application for membership

When you apply for membership with your State Girl Guide Organisation, the application form includes statements about privacy and requests for consent. Those privacy statements refer you to this policy where more detail is available on how any information about you may be used and disclosed in relation to your membership of Girl Guides

When you apply for membership, you consent to us collecting, maintaining, using and disclosing personal information about you and provided by you or by another person in accordance with this policy

5. Purpose for Girl Guides collecting, hosting, using and disclosing personal information

Range of purposes

By signing the membership application form, you consent to us using your personal information in the following way:

- To maintain a register of our membership
- To respond to your request or help us process any request for our activities or services
- To effectively administer all activities and services that we provide to you
- To communicate with you about the activities and services that we may provide you
- To inform you of relevant internal or external activities, events, promotions or special offers that may be of interest to you
- To identify geo-demographic details of our membership for the purpose of building membership
- To ensure the safety, health and well-being of all members while they participate in Girl Guide activities
- To carry out research, marketing or development of our products, activities and services including the surveying of members on their needs and attitudes
- To provide contact information to enable communication between members of the Movement.
- To assess the suitability of adult members to be in charge of our youth members
- To provide personal details of potential adult Leaders to relevant State Child Protection Authorities for criminal record checks in accordance with State legislation
- To direct membership enquiries to you if you are the Leader in charge of an entity
- To direct enquiries to you regarding the use or hire of a Guide property if you have been appointed for that purpose (this may include listing your name and contact details on a State Girl Guide Organisation website)
- To assess, process and investigate claims made under any insurance products we provide to support the safe and effective roll out of Girl Guiding activities and events

Disclosure and sharing of information

If you have chosen to provide us with your email address, we may use that address to advise you of matters of Girl Guide interest as well as for communication, 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 State Girl Guide Organisation and National websites.

We may release information about you 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.

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

When you join Girl Guides you agree that we may use your contact/personal details to send you information about our organisation and its activities and services that we feel may be of interest to you, and to contact you from time to time to obtain your feedback about our activities and services.

You also agree to the collection of sensitive data for the purposes disclosed in this policy.

We will not use your personal information for any purpose that you would not reasonably expect us to use it for. Your information may be used to offer you other products, services and activities that will enhance our relationship with you. You may decide on joining, and at any other time by informing us in writing, that you do not wish to be contacted in this way. It is assumed that existing members have given consent unless they advise us otherwise.

Girl Guides 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 and Managers, whose role is to supervise and in some cases assess the performance of those members, is also essential.

For these reasons, State Girl Guide Organisations staff as well as relevant Region and District Managers and Unit Leaders are authorised to provide limited personal information about a member to another member for bona fide purposes. As a general rule we do not disclose the member's work details.

We also publish a contact list showing limited personal details for a select list of senior adult members which are the State Leadership team, Region and District Managers. Unit specific access to membership information is provided to Unit Leaders. Event Managers are provided access to information of members attending the event/activity that they are in charge of.

This list is provided to all those on the list for contact purposes.

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.

6. Commercial use of data

External organisations

We do not provide external organisations or individuals who wish to offer a product or service that they believe will be of benefit to our members access to our data.

If there should be a decision that external information on our members should be provided to our membership then members will be advised in writing that this there is an agreement for a once off communication to members only. Members will be informed in writing of the relationship with external parties and its nature of the agreement between the external organisation and Girl Guides Australia and/or State Girl Guide Organisation. Members will be given the opportunity of opting out of the communication.

As with most organisations, Girl Guides relies on third party suppliers to conduct specialised activities such as bulk mail outs, data processing, printing etc. We also source third party agents to provide Girl Guide Organisations with support for insurance and legal advice. These agents act on behalf of Girl Guides Australia and State Girl Guide Organisations and do not facilitate their own commercial agendas whilst processing your personal information. While your personal information may be provided to these agents to enable them to perform their agreed tasks, such information remains the property of State Girl Guide Organisations and Girl Guides Australia at all times and the agent organisations involved are bound by specific confidentiality, non-disclosure agreements and data disposal protocols.

When required Girl Guides Australia, State Girl Guide Organisations, 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.

7. How do members of Girl Guides access personal information

Making a request

Members of Girl Guide Organisations (State and Australian) can request at any time to be given a copy of the personal information that is held about them.

State Girl Guide Organisations and Girl Guides Australia will process your request within a reasonable time, usually 14 days.

There is no fee for requesting access to or updating a members information.

Before giving you access to, or amending, your records, either in person or over the phone, State Girl Guide Organisations may require you to prove your identity. State Girl Guide Organisations may ask you to verify your full name, membership number, date of birth and address.

Who to?

Any privacy or other enquiries can be made to your State Girl Guides Organisation:

GIRL GUIDES NSW & ACT			
Level 2 55 Holt Street	SURRY HILLS	NSW	2010
PO Box 950	STRAWBERRY HILLS	NSW	2012
PH:	02 8396 5200		
FAX:	02 9211 5911		
EMAIL:	guides@girlguides-nswact.org.au		
WEB:	www.girlguides-nswact.org.au		
GIRL GUIDES NORTHERN TERRITORY			
55 Ross Smith Ave	PARAP	NT	0820
PO Box 2	PARAP	NT	0804
PH:	08 8981 3628		
FAX:	08 8941 1147		
EMAIL:	girlguidesnt@inet.net.au		
WEB:	www.girlguidesnt.com		
GIRL GUIDES QUEENSLAND			
Unit 1,132 Lutwyche Road	WINDSOR	QLD	4030
PO Box 739	FORTITUDE VALLEY	QLD	4006
PH:	07 3357 1266		
FAX:	07 3357 1066		
EMAIL:	state@guidesqld.org		
WEB:	www.guidesqld.org		
GIRL GUIDES SOUTH AUSTRALIA			
63 Beulah road	NORWOOD	SA	5067
PH:	08 8418 0900		
FAX:	08 8132 0424		

EMAIL:	guides@girlguidessa.org.au		
WEB:	www.girlguidessa.org.au		
GIRL GUIDES TASMANIA			
17 Clarence Street	BELLERIVE	TAS	7018
PO Box 8	ROSNY PARK	TAS	7018
PH:	03 6244 4408		
FAX:	03 6244 4804		
EMAIL:	office@guidestas.org.au		
WEB:	www.guidestas.org.au		
GIRL GUIDES VICTORIA			
129 York Street	SOUTH MELBOURNE	VIC	3205
PO Box 827	SOUTH MELBOURNE	VIC	3205
PH:	03 8606 3500		
FAX:	03 9699 6277		
EMAIL:	guides@guidesvic.org.au		
WEB:	www.guidesvic.org.au		
GIRL GUIDES WESTERN AUSTRALIA			
168 Burswood Rd	BURSWOOD	WA	6100
PO Box 780	VICTORIA PARK	WA	6979
PH:	08 9355 4586		
FAX:	08 9355 4589		
EMAIL:	reception@girlguideswa.org.au		
WEB:	www.girlguideswa.org.au		

The national office contact details are:

GIRL GUIDES NATIONAL OFFICE			
Suite 103, Level 1 100 William Street	WOOLLOOMOOLOO	NSW	2011
PH:	02 9311 8000		
FAX:	02 9319 7453		
EMAIL:	guides@girlguides.org.au		

The National Office of Girl Guides Australia will refer members in the first instance to their State Girl Guide Organisation office on matters relating to information on their individual membership.

Reliability depends upon member information accuracy

We rely on the accuracy of the information that your or your entity provide us. We try to ensure that all information which we collect, use or disclose is accurate, complete and up to date. We conduct periodic internal checking procedures to ensure that as far as is practicable that the data held by us is accurate and current.

You should promptly notify State Girl Guide Organisation if there are any changes to your personal information.

Making corrections and ensuring accuracy of data

From time to time, for the purposes of data correction, Girl Guides may provide your or your entity with a computer printout of some or all personal information that we hold about you.

We also provide an 'Individual Membership Details Change Form' to allow you to advise us of amendments.

State Girl Guide Organisations use many forms other than the membership application form for various operational purposes. These forms often request personal details from you, which were previously collected from your original membership application. These provide us with further opportunities to ensure our data is accurate and current.

Any amendments to your records will be processed as soon as possible after such reports or forms are returned to State Girl Guide Organisation Offices

8. Raising concerns on Girl Guide practice of Privacy Policy or APP

Complaints

Complaints will be resolved in accordance with the Girl Guides Australia Grievance Resolution Procedure

This procedure is available through State Girl Guiding Organisations. Complaints should initially be made in writing to the Executive Officer/Manager at the relevant State Girl Guide Organisation, phone 1300 44 75 48, or by email as per the contact list for State Girl Guide Organisations listed in this policy.

Further information about privacy rights can be obtained from The Office of the Australian Information Privacy Commissioner at www.oaic.gov.au/privacy/about-privacy or by telephoning 1300 363 992.

9. Disclosure to overseas recipients

Overseas

We do not process any data overseas as all servers that hold our databases are based in Melbourne, Victoria.

If a member is travelling to an overseas Girl Guide or Girl Scout event, we may disclose personal information to overseas recipients, for the same purposes as outlined in this Policy.

Members should be aware that Girl Guides Australia – as part of its obligations to the World Association of Girl Guides and Girl Scouts (WAGGGS) – does report on high level membership and participation numbers but at no time in this reporting is personal information shared. As part of our work with the WAGGGS, Girl Guides Australia will share personal information of our national office bearers and in this instance we seek permission from these members expressly for this purpose.

Specified countries

it is impractical to specify those countries in advance. We will only disclose personal information to Girl Guide and Girl Scout organisations in the countries which our members are visiting for Girl Guide and Girl Scout events.

Appendix 1: Definitions and Abbreviations

Term	Definition/Abbreviation
Board	The Board of GGA.
Chief Commissioner of GGA	CC
National Matters	Activities and work which is delivered by and comes under the auspice of the National organisation. E.g. National events, National Managers and Committees, Members representing GGA at international events.
State Girl Guide Organisations	SGGO: Girl Guides New South Wales and the Australian Capital Territory, Girl Guides Northern Territory, Girl Guides Queensland, Girl Guides South Australia, Girl Guides Tasmania, Girl Guides Victoria and Girl Guides Western Australia.
Volunteer	A person doing unpaid work for or on behalf of GGA or a SGGO.
Youth members	Current financial members of the SGGOs under 18 years of age.