



PRIVACY POLICY

1. INTRODUCTION

The aim of this policy is to ensure the information given to Brighton Recreational Centre (BRC), in trust, is to be used only by BRC, and other parties as may be required, for the reason which it was gathered.

BRC will only collect the personal information it requires from you in order to carry out its statutory and legal responsibilities and to deliver its services. BRC complies with the requirements of the Privacy and Data Protection Act 2014 in carrying out these responsibilities.

We have implemented procedures to ensure your personal information will be protected and kept only as long as is absolutely required by BRC or the law.

2. SCOPE

This policy applies to all employees, board members, contractors and volunteers of Brighton Recreational Centre. This policy covers all personal information held by BRC and includes information we have collected, irrespective of its format or how it was collected.

3. DEFINITIONS

Term	Definition
Personal information	means information that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, but does not include information of a kind to which the Health Records Act 2001 (Vic) applies.
Sensitive information	is personal information or an opinion about an individual's:

	<ul style="list-style-type: none"> • race or ethnic origin; • political opinions; • membership of a political association; • religious beliefs or affiliations; • philosophical beliefs; • membership of a professional trade association; • membership of a trade union; • sexual preferences or practice and • criminal record.
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4. POLICY

4.1 Privacy Statement

Brighton Recreational Centre is committed to providing customers with the highest level of service, this includes protecting your privacy. The aim of our privacy policy is to ensure personal information is handled responsibly and a consistent approach is used concerning its collection, use and disclosure.

Our Privacy Policy contains the following, and requires us to communicate to all users regarding the use of your personal information:

- What is personal information
- How we collect personal information
- How we use personal information
- When we disclose personal information
- Storage and security of personal information
- Accuracy of personal information
- Access to personal information

4.2 What is personal information?

Personal information is data collected from an individual who can be identified, or whose identity can be reasonably ascertained, from the information.

The information collected typically includes, but is not limited to:

- contact details
- date of birth
- gender
- credit/debit/bank account details
- attendance records
- purchasing records
- health details

4.3 Application of policy

How we collect personal information

To deliver and enhance the services offered by Brighton Recreational Centre, relevant personal information is collected. Brighton Recreational Centre collects personal information that is volunteered when;

- You register to become a user of Brighton Recreational Centre
- You enter a gymnastics competition run either by Brighton Recreational Centre or another club affiliated with Gymnastics Australia
- You purchase merchandise from Brighton Recreational Centre
- You hire the facility

4.4 How do we use personal information

We only collect information that is necessary for us to carry out our primary purpose, which is providing services relating to memberships, programs, events and merchandise. Your personal information may be used in order to:

- Provide the service you require
- Internal accounting and administration
- Regulatory reporting and compliance
- Helping us to provide and inform you of products or services that may be of benefit to you.
- to contact people in order to provide services requested by them

- invite people to provide feedback about their experience via a survey
- to contact people where it is necessary to resolve issues relating to services or functions which people have brought to our attention

We disclose personal information to organisations we believe are necessary in assisting Brighton Recreational Centre in providing a professional service. The organisations in which we disclose information include:

- outsourced service providers who may manage the services we may offer to you, including but not limited to: Insurers and medical personnel
- our professional advisors, including our accountants, auditors and lawyers
- third parties engaged to process financial transactions/direct debits
- Government and regulatory authorities and other organisations, as required or authorised by law.
- debt collection agencies;
- government agencies including the Department of Health and Human Services, the Department of Education and Training, and the Victorian WorkCover Authority in accordance with their relevant legislation and functions
- law enforcement and emergency agencies, including the Victoria Police and SES, for emergency or law enforcement purposes;
- other individuals or organisations where BRC believes that the disclosure is necessary to lessen or prevent a serious threat to an individual's life, health, safety or welfare or a serious threat to public health, safety or welfare.

Personal information in applications for employment with BRC will be supplied to agencies such as the Victoria Police where required by law (for instance, under the Working with Children Act 2005 (Vic)) as part of a background check. Background checks will only be carried out on applicants for selected positions prior to employment with BRC. Such checks will only be carried out with the applicant's written authorisation and the results will not be disclosed to third parties unless authorised by law.

Disclosure of personal and health information will be in accordance with the Australian Privacy Principles

We limit the use and disclosure of any personal information provided to us to such organisations for the specific purpose for which we supplied it. When you provide us with personal information about other individuals, we rely that on you to have made them aware that you will or may provide their information to us, the purpose we use it for, the types of third parties we disclose it to and how they can access it.

4.5 Storage and security of personal information

BRC will take all practicable steps to ensure that personal information held by BRC is stored safely and securely, so that it is protected from misuse, loss, and unauthorised modification and disclosure. This applies regardless of the format in which the information is held. BRC will take reasonable steps to archive or dispose any personal information that you provide to BRC, which is no longer necessary for BRC's purposes.

4.6 Access to personal information

You have a right to access your personal information, subject to some exceptions allowed by law. If you would like to do so, you can gain access to your personal information by contacting the Brighton Recreational General Manager. Alternatively, you may advise us at any time of possible breaches to the Privacy Policy and inaccurate or incomplete personal information.

4.7 Policy breaches and consequences

Brighton Recreational Centre undertakes to deal with any complaints of a breach of the Privacy Policy promptly, seriously, sensitively, and confidentially. At any stage, it is the prerogative of the Complainant to proceed with, or dissolve, a complaint. The following procedure is to be followed should a breach of this Policy become evident:

Procedural Steps

1. The breach should be formally reported to the General Manager for attention
2. The General Manager will take all steps necessary to address the breach

3. If required, the breach will be brought to the board where a person designated will be empowered to address the breach specifically with the individual reported to have breached the Policy.
4. Following an approach with the individual, should the behaviour continue, the Chair and Centre Manager will address the individual concerned (where the individual concerned is neither the Chair nor General Manager)
5. If no resolution is achieved reports are provided to the full Board to determine the appropriate course of action.

4.8 Confidentiality and reporting

The Centre representative(s) responsible for implementing this Policy will keep confidential, as per the Centre's Privacy Policy, the names and details relating to complaints, unless disclosure is:

- Necessary as part of the corrective process;
- Required by law
- To BRC's employees, officers or professional advisors as BRC reasonably deems necessary

4.9 Complaint handling procedure

Complaints should be resolved as soon as possible; should the complaint not be resolved then the grievance procedure of the Centre is to be followed.

4.10 Additions and changes to policy

Recommended changes to this Policy may be submitted to the Brighton Recreational Centre Board of Directors for consideration. The board will review the recommendations and have the authority to make changes to this Policy. Should changes be accepted the Policy would be updated and, dated, and the revised version made available on the BRC website and circulated as appropriate.

5. ROLES AND RESPONSIBILITIES

POSITION	ROLE/RESPONSIBILITY
General Manager	<ul style="list-style-type: none">• Responsible for the development, monitoring and review of the policy• Responsible for ensuring suitable resource and support systems to enable compliance with this policy• To be responsible for ensuring compliance with related legislation, regulations and standards• Investigation and resolution of any matters relating to this policy. Matters include: complaints, requests for access to health information and any requests to correct health information.• Ensure its public availability on the BRC webpage.• Maintain the Policy currency.
Managers and Coordinators	<ul style="list-style-type: none">• To ensure that processes and systems are compliant with the Policy and all related legislative obligations.• Comply with all processes and systems relating to privacy obligations• Report to the General Manager any breach or operational vulnerability in respect to privacy obligations
All Staff	<ul style="list-style-type: none">• Comply with all processes and systems relating to privacy obligations• Report to the General Manager any breach or operational vulnerability in respect to privacy obligations

6. MONITORING, EVALUATION AND REVIEW

Adherence to this policy will be monitored through:

- the centres compliance program
- incident reporting process

Dated: 15th April 2020

Reviewed: 8th June 2021

Reviewed and Revised: 16th April 2024

Next Review Due: 16th April 2026