



# **Altona Hockey Club**

## **PRIVACY POLICY FOR THE ALTONA HOCKEY CLUB INC.**

Registration No. A397

ABN 21 110 938 232

*Updated 16<sup>th</sup> March 2004*



## Privacy Policy

This document details the policy of Altona Hockey Club Inc. (AHC) in relation to their member's private information.

### 1. Policy Intent and Background

This particular policy has been designed to provide guidelines in the collection, use and security surrounding and disclosure of personal information and outline appropriate and acceptable access to the database.

AHC membership database is one of the organisation's most valuable assets. In December 2000 the Federal Government passed an amendment to the 1988 Privacy Act (Private Sector). This amendment came into effect from December 2001 and sets out how private sector organisations should collect, use, keep, secure and disclose personal information.

The principles of this Act also allows individuals the right to know what information an organisation holds about them and their right to correct it if it is wrong.

AHC policy serves to voluntarily meet the requirements of the new Act while also addressing two major concerns surrounding the membership database as currently operated.

#### 1.1 Accuracy of Data

A process of periodic member information review to determine the quality of the information is performed.

The consistency of the process impacts on AHC's ability to provide quality member information to comply with affiliation bodies, such as Hockey Victoria.

#### 1.2 Database Access

AHC receives requests for access to and copies of the database.

This policy serves to outline when access is appropriate and how it can be facilitated. **AHC does not sell their membership database.**

## 2 How the Policy works

AHC has set the policy to provide guidelines on membership privacy, affiliation and database access matters.

### 2.1 AHC's role and contribution in making this policy work is to:

- 2.1.1. Prepare policy statements on membership privacy and database access
- 2.1.2. Use the policy in relation to membership privacy and database access matters
- 2.1.3. Ensure appropriate training is provided to personnel accessing and using the database
- 2.1.4. Communicate the policy to all members by the Club Executive
- 2.1.5. Review the policy when appropriate and inform members of any changes



- 2.1.6. Ensure the policy is available to members upon request
- 2.1.7. Make known to affiliated associations (Hockey Victoria) any barriers in fulfilment of the policy at our Club level
- 2.1.8. Develop a policy that complements affiliated association's policies
- 2.1.9. Report to affiliated associations any membership information as deemed necessary in an accurate and timely manner

## **2.2 The individual's role and contribution is to:**

- 2.2.1. Contact necessary representative of AHC with any changes or corrections to their information, so that records can be maintained

## **3 The Policy**

AHC Inc maintains personal information in various formats including paper records and computer.

The objectives of the AHC Database are to:

- Improve member services and retention by creating opportunities for value added services
- Facilitate administrative efficiencies
- Maintaining historical records
- Promote communication
- Develop new marketing opportunities
- Provide accurate statistics on sport participation for government and other relevant agencies
- Facilitate planning and future development

## **4 Database Policy Coverage**

This policy covers the activities of AHC and any organisation affiliated with AHC. The database will contain all or part of the following information:

- Name, address, phone numbers, and other contact details if applicable
- Gender
- Occupation
- Date of Birth
- Participation details
- Association/Club/Team details
- Registration history
- Type and duration of membership where applicable
- Accreditation details
- Committee membership
- Profiles (national/state/regional/squads)
- Member type (guests, junior, senior, current, non current, media etc)
- Facility information
- E-mail
- Next of kin and contact details



Data held on participants will be used for three primary purposes:

#### **4.1 Statistics**

Personal information, in de-identified form, will be collated and used to produce statistics that will be supplied to government agencies and others as required.

They will also be used by Hockey administration for purposes of researching, developing and managing new and existing programs, for strategic and other planning and for promoting the sport of Hockey.

#### **4.2 Administration**

Personal information will be used for the purpose of communicating with participants about their membership and/or their involvement in programs, competitions and Hockey activities.

#### **4.3 Information**

Personal information will be used for the purpose of providing information to participants about matters pertaining to Hockey, activities of Hockey administration and its sponsors. Any participant may request not to receive mail communications that do not directly relate to their participation in programs or their membership.

### **5 Collection**

The purpose of collecting personal information is outlined in Clause 3. AHC collects personal information only by lawful and fair means and not in an unreasonably intrusive way.

AHC ensures that the individual is aware of:

- The identity of the organisation and how to contact it,
- The fact that they are able to gain access to their information, and
- The purposes for which the information is collected.

AHC collects personal information about an individual only from that individual or, if under 18 years of age from their parent(s) or guardian(s).

This is collected on behalf of AHC by AHC Board members or their authorised delegates.

### **6 Information Access**

AHC will facilitate database access only to AHC Board members or their delegates, government and controlling hockey administrations as and when necessary.

Access is provided in order to:

- Contact members or a member's emergency contact
- Facilitate AHC mail outs – either in paper or electronic form



- AHC must approve any 'response mechanism' that enables data collection used through any mail out.
  - **At no time will an AHC sponsor receive individual contact information.**
  - **AHC at all times reserves the right to refuse access to our database.**

## **7 Use and Disclosure**

AHC will not use or disclose personal information about an individual for any purpose unless:

- The individual would reasonably expect the organisation to use or disclose the information; or
- The individual has consented to the use or disclosure; or
- If the information is not sensitive information and the use of the information is for the direct non-financial benefit of AHC. It is impractical for the organisation to seek the individual's consent before that particular use

If AHC uses or discloses personal information, it will make a written note of the use or disclosure.

## **8 Data Integrity and Security**

AHC takes reasonable steps to make sure that the personal information it collects, uses or discloses is accurate, complete and up-to-date.

AHC takes reasonable steps to protect the personal information it holds from misuse, loss or from unauthorised access, modification or disclosure.

AHC takes reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any individual purpose.

## **9 Openness**

This document sets out clearly expressed policies on its management of personal information.

This document is available to all members, upon request.

AHC holds personal information about individuals, and as such provides individuals with access to the information on request by the individual or if a junior, by their parent(s) or guardian(s). If individuals are able to establish that the information is not accurate, complete and up-to-date, AHC takes necessary steps to correct the information so that it is accurate, complete and up-to-date.

If the AHC and the member disagree about whether the information is accurate, complete and up-to-date, and the individual may ask the AHC to associate with the information a statement claiming that the information is not accurate, complete or up-to-date with the AHC taking reasonable steps to do so.



AHC will provide reasons for denial of access or a refusal to correct personal information.

AHC will not collect sensitive information about an individual unless:

- The individual has consented; or
- The collection is required by law; or
- The collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individuals whom the information concerns.

## **10 Policy Review**

The policy will be reviewed at the Annual General Meeting for 2003 and then on an annual basis thereafter. This will ensure that the policy remains current and practical.

Dated: 16<sup>th</sup> March 2004

Reviewed: Policy to be reviewed annually

**For and on Behalf of its Members.**  
**The Altona Hockey Club Inc. Board**