

Section 2: Governance Policies and Procedures**Title: 2.13 Privacy Policy and Procedures****Purpose:**

The Australian Privacy Principles contained in Schedule 1 of the Privacy Act 1988 outlines how organisations must handle, use and manage personal information. Principle 1 requires Nature Foundation to have a Privacy Policy which describes how it manages personal information in an open and transparent way.

Policy:

It is the policy of Nature Foundation that:

- It respects the privacy of its Staff, Volunteers, Contractors, Agencies, Board and Committee members, Managers, Students, Young People, Members, Visitors, Supporters and Donors and only collects personal information by lawful and appropriate means.
- Complies with legal requirements regarding privacy.

Scope:

This policy applies to all information collected and retained by Nature Foundation.

The Privacy Act 1988 (Privacy Act) regulates how personal information is handled and defines personal information as:

...information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

Common examples are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details and commentary or opinion about a person.

The Privacy Act also regulates the privacy component of the consumer credit reporting system, tax file numbers, and health and medical information.

Definitions:

The Australian Law Reform Commission considered the *concept* of privacy and states:

"It has been suggested that privacy can be divided into a number of separate, but related, concepts:

- *Information privacy*, which involves the establishment of rules governing the collection and handling of personal data such as credit information, and medical and government records. It is also known as 'data protection'
- *Bodily privacy*, which concerns the protection of people's physical selves against invasive procedures
- *Privacy of communications*, which covers the security and privacy of mail, telephones, e-mail and other forms of communication and
- *Territorial privacy*, which concerns the setting of limits on intrusion into the domestic and other environments such as the workplace or public space. This includes searches, video surveillance and ID checks.

Responsibilities:

Board is responsible for:

- Periodically determining that the policy has been complied with and reviewed.

The Chief Executive Officer, by Delegation of the Board, is responsible for:

- Approving and periodically reviewing this policy.
- Periodically assessing compliance with the policy and reporting to the Board.
- Ensuring all persons impacted are aware of the policy.

Managers, Staff and Rotational Managers are responsible for:

- Ensuring they and personnel for whom they are responsible are aware of and comply with the policy.

Volunteers and others will:

- Be made aware of and comply with relevant policies.

General Procedures:

Nature Foundation will not be unreasonably intrusive when obtaining and managing information and will only keep information that is necessary for the purposes of managing its obligations under legislation, meeting business operations and employment responsibilities.

Personal details will be maintained and accurately and regularly updated. Nature Foundation will only use information for the purpose for which it is collected. It will always be open and transparent in its dealings and will freely advise such persons about the sort of personal information held, how this is collected, used and disclosed.

It will not disclose personal information to any other external parties unless prior written permission is obtained from the owners of the information, or it is required by law.

Nature Foundation is required to gather information to assist with the operation and management of its business programs and to meet its obligations under legislation.

Some key functions and activities that involve the collection and management of personal information include, but are not limited to:

- Conducting membership drives
- Maintaining a membership register
- Maintaining donor register
- Maintaining a volunteer register and records
- Providing services to members and visitors to Nature Reserves
- Conducting publicity campaigns
- Conducting funding campaigns
- Managing employee records
- Managing other personal records
- Running a website
- Sending out communications
- Sending out newsletters
- Managing grants and funding programs, and resultant alumni
- Running events and working bees
- Conducting research, nature based and geo tourism programs
- Conducting Kid on Country and Youth Program Initiatives
- Business development

Some key information that will be collected includes, but is not limited to:

- Names – personal and business
- Title
- Address – postal, business, residential
- Signature

- Date of birth
- Phone numbers
- Electronic communication addresses
- Medical and health information
- Employment history, training and qualifications
- Personal references and referee information
- Financial information such as tax files numbers, superannuation membership, credit card numbers
- Emergency contact details
- Criminal history checks
- Personal bios
- Photographic images

Without their prior written permission, Nature Foundation will not sell, trade or give away information about individuals to anyone else (local, national or international), unless required to do so by law.

Information collected will be managed in both document and electronic formats. Steps will be taken to ensure information is only accessible on a need to know basis to key personnel. Storage will be protected electronically with computer passwords and documents filed out of common areas.

Information that is no longer needed will be archived, deleted, destroyed or de identified as required. A hard-copy document destruction collection facility is provided to assist with sensitive information management.

All parties from whom information is collected will be made aware of what information is collected, the reason for the collection and how this information will be used and managed.

Nature Foundation will provide strategies for managing grievances and complaints in regards to people's concerns about the way information is collected, the type of personal information being collected and ways information is managed. The complaint must be directed to the Chief Executive Officer in writing (document or electronic).

Individuals have the right to request access to personal information Nature Foundation holds about them and the right to request information be corrected if incorrect. Such request must be made in writing (document or electronic) 24 hours prior to viewing.

The Privacy Policy is available free of charge upon request for a printed copy or for emailing and will be displayed on the website.

Linkage to other Policies and Procedures:

Confidentiality Policy and Procedures
 Declaration of Interest and Conflict of Interest Policy and Procedures

Forms or records linked to this Policy and Procedures:

Grievance Resolution Policy and Procedures
 Privacy Statement

Sourcing and referencing:

<https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles>
 Australian Law Reform Commission

Legislative context:

Australian Privacy Act 1988
 Australian Privacy Principles

Developed by:	A Clark	Development date:	18.10.17
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Next review due: February 2021, February 2023

Policy Owner	Nature Foundation
Policy Approval	The Nature Foundation Chief Executive Officer by Delegation of the Board.
Signed off by	Chief Executive Officer
Review Schedule	To be reviewed every two years.
Consultation	Reviews of this Policy and Procedure should include consultation between Nature Foundation Board, CEO and relevant Nature Foundation personnel as required.

Signed by Chief Executive Officer

Name Hugo Hopton

Signature


Version control and change history:

Version Number	Review Date	Reviewed by	Approved by	Amendment
1.0	18.10.17	A Clark		Drafted
1.1	20.05.18	A Clark		Fitted to new policy template
1.2	14.9.18	J Ferguson		Reviewed minor amendment
1.3	2.12.18	H Hopton		Review minor amendment
1.4	5.2.19	Councillors		Minor amendments
2.0	25.2.19		Council	
2.1	7.1.21	A Clark		Rebranding and CLG edits