



# Privacy & Confidentiality Policy

## Background

The Committee of Management (COM) of Beaconsfield Neighbourhood Centre (BNC) is committed to protecting the privacy and confidentiality of personal information which it collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

Information is collected to comply with the requirements of funding and service agreements; for planning and programming purposes; and to satisfy the Centre's legal obligations. The Victorian Government introduced two privacy statutes which came into force in 2002 which regulate the management of personal information by Beaconsfield Neighbourhood Centre. These are the Health Records Act 2001 (see <https://www.health.vic.gov.au/legislation/health-records-act>) and the Privacy and Data Protection Act 2014 (see <https://www.legislation.vic.gov.au/in-force/acts/privacy-and-data-protection-act-2014/027>).

Other legislation such as the Privacy Act 1988 (Commonwealth) also promotes and protects individual privacy and confidentiality. BNC is exempt from the Act as a not-for-profit organisation with an annual turnover of less than \$3 million but references the principles to ensure the highest regard for privacy and confidentiality is taken.

## Purpose

The aims of this policy are:

- To ensure that the privacy and confidentiality of staff, participants, contractors, committee members and volunteers of the Beaconsfield Neighbourhood Centre is protected at all times.
- To provide a framework and clarity for Beaconsfield Neighbourhood Centre in dealing with confidentiality considerations.

## Policy Statements

Beaconsfield Neighbourhood Centre recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies.

Staff, tutors and volunteers have an obligation to respect the confidentiality of information of a personal nature however innocuous it may appear.

Beaconsfield Neighbourhood Centre is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles as minimum standards in relation to handling personal information:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why the information is collected and how the information gathered is administered;
- Use and disclose personal information only for the Centre's primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access, loss, modification, disclosure or other misuse; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

### Staff, Tutors & Volunteer Guidelines

- The information on the membership database is confidential and must not be given out to anybody, including the Police, without following the appropriate course specified in the Constitution. If the Police request information about Centre users for law enforcement purposes, the police should be referred to the Centre Coordinator.
- In the event of a request for a member's address or phone number, staff should note the name and number of the enquirer and inform them that they will contact the member and pass on the message.
- Membership forms must be stored in a secure place and not shown to any unauthorised people.
- Personal records may only be accessed by BNC staff for the purpose of carrying out activities as required in their Position Description.
- Class lists must not contain details other than participant names. Personal information entrusted to staff, volunteers and Committee of Management will not be inappropriately discussed.
- Computer screens will be cleared/locked when not attended.
- Identifying information which is out of date or no longer required will be destroyed by shredding or burning, not put in a rubbish bin.

### Collection Practices and Purposes

Personal and/or health information relating to:	Primary purpose and methods of collection:	Types of information that may be requested:	Example of how information will be used:
Members	To manage and administer the Centre's programs. - Membership form - Health form (for certain physical classes) - Surveys	Name, address, phone number, email, emergency contact information, medical conditions, personal opinions/feedback, concession card, proof of ID	Compliance with funding and service agreements. For program planning and development. For communication from staff and volunteers if required. To notify tutor of any health conditions. In case of emergency. For reduced fees.
Children and parents/guardians	To enable care of children attending the Occasional Care service. - Enrolment form - Collaborative Care form - Direct Debit Form	Contact details, Medicare card & Centrelink numbers, emergency contacts, immunisation certificate, Medical History, Restraining/Custody orders, bank details	For communication regarding child's attendance. To satisfy the service's legal obligations and allow it to discharge its duty of care. For payment processing

Committee Members	For the governance of the Centre. - Membership form - Nomination Form - Registration forms - Safety Screening procedures	Contact details, Date of Birth, Police check, Background checks, WWCC	Satisfy Cardinia Shire's and Department requirements for funding. For communication between COM members, staff and other members of BNC as appropriate. Satisfy the Centre's legal obligations.
Staff, Tutors, Contractors and Volunteers	To assess and engage applicants. To administer employment. - Resumes - Forms - Contract/Statement	Contact details, Date of Birth, Tax File Number, ABN, WWCC, Police Check	Administration, health and safety, insurance purposes, ATO requirements. Satisfy the Centre's legal obligations.

### Access & Correction

Any person may request to see their personal information that BNC holds. Appropriate identification must be shown before any information will be released. Corrections may be made if the data is not accurate, complete or up to date.

Requests will be acknowledged within 2 days and complied with within 30 days. However, there may be a delay if the timeline occurs over a period when the Centre is closed.

Exceptions are set out in the Acts where access may be denied in part or in total. This may be if the request is frivolous or vexatious, providing access would have an unreasonable impact on the privacy of other individuals or pose a serious threat to the life or health of any person. Reasons for denying access will be given in writing.

The BNC Constitution outlines further procedures and conditions regarding requests for information such as the Member Register and Inspection of Records.

### Photographs and Video Footage

All members should select their preference regarding photos taken at the Centre on their Annual Membership Form. Individuals are always free to decline participating in photo shoots or filming. Where possible, additional permission will be sought regarding specific photos of identifiable individuals before their use in advertising or for other purposes.

The Children's Room staff ensure the appropriate and permitted use of images of children. Prior to any sharing or distribution, images of children in a group photograph or in the background of other photos will be blurred or otherwise de-identified if photographic permissions have not been provided by the parents on their membership form.

### CCTV

BNC has a comprehensive CCTV Policy with specific statements and details around the CCTV system installed for security purposes at the Centre. The CCTV Privacy Notice contained in that policy is added to the below Privacy Statement for the Website.

## Breach

A breach of confidentiality is when private information is disclosed to a third party without the owner's consent. All employees and volunteers should be aware of this policy and its requirements to take due care with the information they are privy to. Breach of confidentiality can result in disciplinary action and possibly even legal action. A suspected or accidental breach must be reported as soon as possible to minimise any impact on affected individuals.

## Roles and Responsibilities

Management	<ul style="list-style-type: none"><li>Record breaches along with what action is decided. This record should be included in COM meeting minutes.</li></ul>
Centre Coordinator	<ul style="list-style-type: none"><li>Where a privacy or confidentiality breach is perceived or established advise the COM as soon as possible.</li><li>Investigate possible breaches immediately.</li></ul>
Staff, Tutors, Volunteers	<ul style="list-style-type: none"><li>Ensure a complete understanding of the rules and responsibilities under this policy.</li><li>Report all possible breaches to the Centre Coordinator.</li></ul>

## Privacy Policy Statement for Website

Beaconsfield Neighbourhood Centre (BNC) is committed to safeguarding your privacy online. BNC does not collect personally identifiable information about individuals from our website or social media accounts except when individuals specifically provide their information on a voluntary basis. For example, personal information may be gathered from requests submitted through our contact form or from social media postings (e.g., forums or comments).

BNC will always make reasonable efforts to keep any information that we have about you secure, and to ensure that any of our staff or volunteers who have access to information provided do not make any unauthorised use, modification, reproduction or disclosure of that information. We implement reasonable security measures to protect your personal information from unauthorized access and use. However, please note that no data transmission over the Internet or method of electronic storage is 100% secure.

Personally identifiable information will not be sold or otherwise transferred to unaffiliated third parties. Our website may contain links to third-party websites. We are not responsible for the privacy practices or content of such websites. We encourage you to review the privacy policies of those websites before providing any personal information.

We do reserve the right to perform statistical analysis of user behaviour and characteristics in order to measure interest in and use of the various areas of the site as well as the number of users that have been exposed to or clicked on posts.

## Associated Documents

Membership forms

Health Forms

Enrolment forms  
 Collaborative Care Form  
 Medical Conditions documents  
 CCTV Policy  
 Children's Services Regulations 2020: *Regulation 122*  
 BNC Constitution: *Including Clauses 18, 75*

## Document History

Version	Title	Author	Authorised	Date	Changes to Previous
1	Confidentiality and Privacy Policy	Unknown	No Record	Sep 2004	Original
2	Privacy & Confidentiality Policy	Centre Coordinator	COM	Aug 2018	Yes
3	Privacy & Confidentiality Policy	Centre Coordinator & Vice President	COM	Aug 2022	Minimal
4	Privacy & Confidentiality Policy	Centre Coordinator	COM	Nov 2024	Review with updates and addition of website statement
5	Privacy & Confidentiality Policy	Centre Coordinator	COM	June 2025	Update CCTV clause