

Policy Number	GO 41
Subject	Privacy Policy
Policy	<p>Girl Guides Victoria respects the privacy of all individuals and is committed to protecting the privacy of all individuals they deal with.</p> <p>This document sets out the main principles and procedures for managing Privacy at Girl Guides Victoria.</p> <p>Separate documents include <b>GP41 Privacy Procedure</b> (outlining operational procedures to protect privacy within GGV) and the <b>GGV Privacy Collection Statement</b> (for the use of all customers and stakeholders).</p>
Legislation	<p>Privacy Act 1988 Australian Privacy Principles</p>
Principles	<p>The Privacy Act 1988, as amended by the Privacy Amendment (Private Sector) Act 2000, does not apply to not for profit Organisations unless their annual turnover is more than three million dollars. Although falling within this exemption, as Girl Guides Victoria is an incorporated association (Girl Guides Association Act 1952) with an annual turnover of less than \$3 million, the Australian Privacy Principles (APPs) do not apply.</p> <p>Nonetheless, the APPs apply to individuals, which is defined in the Privacy Act as natural persons. Accordingly, any person who collects information from an applicant in the recruitment process must do so in accordance with the Privacy Act.</p> <p>Girl Guides Victoria intends to adhere to the requirements under the Privacy Act and the National Privacy Principles.</p>
Procedures Under This Policy	<p>Girl Guides Victoria will maintain control of, and take reasonable steps to keep, all personal information it holds securely. As a general rule, Girl Guides Victoria will not provide personal information to any third parties except:</p> <ul style="list-style-type: none"> <li>to contractors engaged to provide services in connection with the purposes mentioned above but only if they satisfy Girl Guides Victoria that they will comply with the Privacy Act and other relevant privacy laws; and if it is otherwise permitted or required by the Privacy Act or any law.</li> <li>As the information relates to an incident, whether it be in Australia or overseas. In a case such as this, relevant information, will be reported</li> </ul>

	<p>and shared with the relevant parties within our Australian organisation, Girl Guides Victoria and the insurer when necessary.</p> <p>Where appropriate, Girl Guides Victoria will handle personal information according to the employee records exemption in the Privacy Act and other applicable exemptions in other legislation.</p>
<p>Membership Privacy Statement</p>	<p>The following statement is to be included on all GGV membership forms:</p> <p><b>PROTECTION OF YOUR PRIVACY</b> <i>Information supplied will be treated, used, and disclosed by Girl Guides Victoria and Girl Guides Australia in accordance with the Privacy Act 1988 and our privacy policy. You agree that information related to an incident, whether it be in Australia or overseas, will be reported and shared with the relevant parties within our organisation, Girl Guides Victoria and the insurer when necessary.</i></p>
<p>Privacy Collection Statement</p>	<p>The above statement on the membership form will not eliminate the need to provide a privacy collection statement at the same time (or as soon as practicable after) the information is collected via the membership form.</p> <p>A privacy collection statement must include:</p> <ol style="list-style-type: none"> <li>a. The facts and circumstances of collection</li> <li>b. If the collection is required or authorised by law;</li> <li>c. The purpose of collection – that is, the specific function or activity for which Girl Guides is collecting the information, and any secondary functions which are directly related to the primary function;</li> <li>d. The consequences of not providing the information (such as that the services can't be provided at all, or if they can be, they may not be to the same standard);</li> <li>e. The other entities to whom the information is usually disclosed;</li> <li>f. Information about access and correction within Girl Guides Victoria privacy policy (and a link to that policy or information on where to obtain the policy);</li> <li>g. When cross-border disclosures of the information could occur (such as if Girl Guides utilises cloud services and the data is stored overseas, or if any staff or support are stationed overseas and have access to the personal/sensitive information).</li> </ol> <p>As you can see from the above, a privacy collection statement restates a lot of the information contained in the GGV privacy policy, but the information contained should be limited to what is relevant for the information being collected at that time.</p>

Data Breach Notification	<p>A data breach is an unauthorised access or disclosure of personal information, or loss of personal information.</p> <p>For serious data breaches where there is unauthorised access that is likely to result in serious harm to any individual to whom the information relates, where harm has not been able to be prevented by remediation, a Statement must be forwarded to notify the Australian Information Commissioner (OAIC) of the breach. Individuals affected by the breach must also be notified to inform them of the contents of this statement.</p>
Details of the Privacy Officer	<p>Contact the CEO of Girl Guides Victoria at Suite 812, 401 Docklands Drive, Docklands Vic 3008, phone 03 8606 3500, or the senior manager of Girl Guides Australia, Girl Guides Australia, <a href="https://www.girlguides.org.au/about/contact/">https://www.girlguides.org.au/about/contact/</a></p>
Related Policies and Procedures	<p>GP41 Privacy Procedure GGV Privacy Collection Statement</p>

### Version Information

Version Number	Content Updated	Person Responsible	Date Updated
2.0	<p>New Policy formatting Membership Privacy Statement section added Privacy Collection Statement section added Data Breach Notification section added Version Control section added</p>	P&P	August 2019
1.1	Updated		June 2015
1.0	Original (formerly GO79)		August 2008