

## PRIVACY PROCEDURE

### POLICY

#### Principles Guiding this Policy

Girl Guides Victoria respects the privacy of its members and other individuals it deals with. This Privacy Policy and Procedure provides guidelines on the collection and handling of personal information to ensure compliance with the Girl Guides Victoria Privacy Policy and all relevant privacy legislation.

#### Scope

This policy and procedure applies to all individuals within Girl Guides Victoria, including units, districts, regions, Trefoil Guilds, Support Groups; and any other guiding entities established under the auspice of Girl Guides Victoria.

#### Definitions

**Personal information** is anything that can identify a person. For example: name, address, telephone number, e mail address, and date of birth.

**Sensitive information** has special protection under law and can only be collected with the person's consent. Sensitive information includes information about a person's health or medical conditions, racial or ethnic origin, political opinions or membership of a political association, religious beliefs or affiliations, sexual preferences, criminal record, and Commonwealth Government numbers (eg. Medicare, Passport and Social Security).

### PROCEDURE

#### 1. Collecting Information

When you collect and handle another person's information, you should:

- collect only what you need for guiding activities or purposes;
- be honest and fair when collecting information - don't do it secretly and don't force someone to provide information;
- collect the information directly from the person involved if you can; and
- tell the person that you (and Girl Guides Victoria) are collecting their personal information and the reason why you are collecting it, unless it is unreasonable to do so. For example, you can provide them with a copy of the Girl Guides Victoria Privacy Policy or refer them to the website.

If you need to collect or disclose personal or sensitive information, make sure that the person whose information it is:

- can understand what they are agreeing to; and
- voluntarily gives their consent.

For youth members or people unable to give consent themselves, the parent or carer's consent should be obtained.

Guide Centre forms will contain appropriate information on privacy and request all necessary consents from the person, so they should be used to collect information wherever possible. Note, consent is given when a police check is requested.

## 2. Using personal information

Information can only be used for guiding purposes, since that is the reason why it was collected. Sensitive information can only be disclosed with the consent of the person.

Do not use Commonwealth Government numbers (such as Medicare and Passport numbers) as an identifier because they make it too easy to match your information about a person with information about them from other sources.

Only transfer Passport numbers overseas when there is consent and appropriate protection for the numbers.

Phone and email distribution lists may be circulated for Guiding purposes provided they do not contain any sensitive information. Phone lists should carry a disclaimer on the list, such as this:

*"The information on this sheet is only to be used for the purposes of Girl Guides Victoria. It is not to be supplied for marketing, commercial or database use."* Only include information about parents if they have given consent.

Camping – information collected when girls go to camp should be collected and read by the Leader in Charge, read and held by the First Aider during camp. The Leader in Charge must inform the Caterer about any specific food requirements of the campers. The Support Group should only hold information necessary for them to carry out their role. Girls can share their information between themselves.

## 3. Access and Correction

All information must be accurate, complete and up-to-date. Regularly update both the Guide Centre print-outs and your unit/district records.

Allow a person to access information about themselves, and correct the information if necessary. Currently there is no fee for accessing or updating information held about a person on the Girl Guides Victoria database.

Do not refuse a person access to information about themselves unless providing access:

would be harmful to the health or safety of another person;  
would breach the privacy of another person; or  
would be illegal, or would interfere with law enforcement.

If you are unsure whether any of these situations apply, check with the Chief Executive Officer.

If you must deny a person access to information held about them, tell them the reason.

#### 4. Storage

Take reasonable steps to protect the information you hold from misuse, loss, unauthorised access, unauthorised changes and disclosure.

Keep documents like Membership Forms, Health Forms and Activity Permission Forms in a secure place (like a locked cupboard) when not in use.  
Store documents in a way that prevents unauthorised people from seeing or reading the information, including family members (if stored at home) or other hall users (if kept at your meeting place).

**Do not leave information out in the open during meetings** where it can be seen by other girls, parents or visitors. This is especially important with forms that contain sensitive information, such as medical conditions.

#### 5. Retention of Records

| Type of Document  | Keep for how long?   | Comments  |
|---|--|---|
| Financial audit records and reports   | 7 years  |   |
| Receipt books, deposit books, bank statements<br>Purchase, including expense payment records, receipts from small cash purchases and cheque butts | 7 years after they are prepared, obtained or the transaction completed | This is not an exhaustive list, and other documentation may sometimes be required from time to time |
| Annual reports  | Indefinitely   | Keep at least one copy  |
| First aid treatment records   | 1 month  | For first aid treatment that has not been elevated to an incident                                   |
| Notification of accident / injury   | Adult - 7 years from the date of the accident                          | If there is an injury, accident or incident at an event or  |

|                        |  |   |
|------------------------|--|---|
|                        | Child - 7 years from the date the child turns 25   | activity, send the permission and health form, the Accident/Incident Form and a copy of details of the program to Guide Centre                                      |
| Activity Consent Forms | <p>One month from the date of the event/activity, unless there is an injury, accident or incident.</p> <p><a href="#">Where an Activity Consent form contains information which is not contained on the GGV database, that Activity Consent Form is considered to contain new health related information and must be retained for the same period as health records.</a></p> <p><a href="#">These Activity Consent Forms will be held in the Region.</a></p> | Only dispose of the records using one of the appropriate methods listed   |
| Membership Forms       | For as long as the child/adult remains a member (a copy of the form is scanned against member on the database)   | Forms should be forwarded on to other units if the person moves from one unit to another<br>Only dispose of the records using one of the appropriate methods listed |
| Minutes of Meetings    | 13 years from the date of the meeting  | Only one copy needs to be kept, usually by the Chairperson or the Secretary   |

Guiding acquires a large amount of paperwork and does not have enough space to store documents forever. Therefore if a document does not fall into one of the categories in the table above, make a decision on how long a document should be stored based on the circumstances. Store and dispose of documents appropriately if they contain personal or sensitive information.

Material may also be submitted to the Girl Guides Victoria Archives for storage. The Archivist has the right to select the items to be retained.

## **6. Destruction of Records**

To protect individuals' privacy rights, information must be destroyed by secure means. Ordinary garbage disposal or recycling of intact documents is not a secure means of destruction.

Destroy paper documents by shredding, pulping (tear into strips put in bucket of water for week then add to garden), disintegration of paper, burning, or using an authorised company.

Destroy electronic and computer records using an appropriate method for the way in which the data was stored. For example, computer files (including any backup files) should be overwritten and deleted from the system.

Do not destroy documents until all legal obligations to retain them have been met. The table above shows how long different documents should be kept for.