

Policy number	GO 41
Policy	Privacy Policy
Principles	<p>The Girl Guides Association of Victoria Inc. (GGV, us, we, our) is bound by multiple privacy laws:</p> <ul style="list-style-type: none"> • the Australian Privacy Principles under the <i>Privacy Act 1988</i> (Cth); • the Information Privacy Principles under the <i>Privacy and Data Protection Act 2014</i> (Vic); and • the Health Privacy Principles under the <i>Health Records Act 2001</i> (Vic). <p>This privacy policy outlines how GGV handles personal information in accordance with all these privacy principles. GGV strives for best practice in how we respect your privacy and handle your personal information. We will update this privacy policy when our information handling practices change and publish updates on our website.</p>
Definitions	<p>Youth Member means a Girl Guide.</p> <p>Adults in Guiding means adult members, volunteers, Trefoil Guild members, and employees of GGV.</p> <p>1. Who we are</p> <p>1.1 We collect, hold, use and disclose personal information to carry out our functions or activities, which include:</p> <ul style="list-style-type: none"> (a) providing Guiding programs for girls and young women to meet our Mission Statement; (b) providing governance and operational management across the organisation, supporting our community of Guides and Adults in Guiding; and (c) managing our Guides and Adults in Guiding in line with Child Safe Child Friendly Framework and legal obligations.
Procedures under this policy	<p>2. Collecting of your information</p> <p>2.1 We try to only collect the information we need for the particular function or activity we are carrying out. We mainly collect personal information directly from Youth Members or Adults in Guiding when you give it to us though paper forms, online forms or over the phone. We may also collect personal information from parents or guardians about a Youth Member.</p>



	<p>2.2 We may collect your name, date of birth and contact details to participate in GGV activities or programs. For example, we collect your name and attendance at Guide meetings.</p> <p>2.3 As part of our regular activities, we may take photographs, digital images, videos and voice recordings for training, promotion, or publicity purposes. Consent for the collection and use of these photographs, images and recordings is included in our membership application and renewal forms. Members can opt-out through the membership portal or in writing. We may also collect separate media consent for specific events and media uses.</p> <p>2.4 We may also collect photos, videos, and voice recordings for our social media.</p> <p>2.5 <i>Collecting sensitive information</i></p> <p>2.6 We may need to collect sensitive information about you if you want to participate in GGV activities or camps or be an employee or volunteer of GGV.</p> <p>2.7 We may collect your health information to help us best work with you and understand your needs and ensure we can carry out our legal obligations to you, such as any disability. We may also collect your vaccination status as part of our response to the COVID-19 pandemic.</p> <p>2.8 We may also collect information about your religious beliefs or affiliations, or racial or ethnic origin. For example, when organising overnight camps, we may need to know of dietary requirements or other cultural needs that can identify your religion or racial or ethnic origin.</p> <p>2.9 If you want to work or volunteer with us, we need to conduct child safety screening checks that involve GGV collecting sensitive information about your criminal record via working with children clearances and police checks. These checks can involve us disclosing personal information about you to government agencies that complete the checks, such as the Department of Justice and Community Safety.</p> <p>2.10 Other sensitive information, such as hobbies, sexual orientation or practices and political opinions we collect less often, but may collect with your consent when this is necessary and relevant to us performing our functions and activities.</p> <p><i>Collecting through our website and online systems</i></p>
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	<p>2.11 GGV's public website, www.guidesvic.org.au/, is hosted in the United States of America. We will collect information that you provide to us through our website when signing up to mailing lists and registering for our events, or when submitting feedback on your experience with us. Our website also collects information such as your device's IP address, pages visited on our website and your device screen type through web analytics and cookies. This improves the functionality of your experience (for example, by opening the mobile version of our website that matches your devices screen size).</p> <p>2.12 If you are a member of GGV, you will be familiar with our intranet system and iMIS. We collect personal information about you through iMIS when you submit online forms, such as your membership renewal form, or a youth or volunteer application form. When we collect personal information over the phone, by email or paper forms, we manually add this information to iMIS. The iMIS platform stores data in Melbourne.</p> <p><i>Anonymity</i></p> <p>2.13 Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, parents and guardians can attend some of our larger events (such as a local promise service or award ceremonies) without providing personal information. However, for most of our functions and activities we need to collect at least your name and contact information.</p> <p>3. Social networking services</p> <p>3.1 We use social networking services (such as Instagram, Twitter, Facebook and YouTube) to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies that are available on their websites.</p> <p>4. Disclosure</p> <p>4.1 Common situations in which we disclose information are detailed below.</p> <p><i>Other Girl Guides organisations</i></p> <p>4.2 We disclose personal information about our members to other Girl Guides organisations in Australia when we organise or facilitate</p>
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	<p>your participation in national camps. For example, if a Youth Member moves to Queensland and wants to transfer her membership to Girl Guides Queensland, we may disclose personal information to Girl Guides Queensland. We may also disclose personal information to facilitate a Youth Member attending an interstate camp as a one-off.</p> <p>4.3 GGV has a data sharing agreement with other Girl Guides organisations in Australia to ensure your personal information is always handled in accordance with the Australian Privacy Principles.</p> <p>4.4 We may also disclose personal information to international Guiding organisations. See below for information about Disclosure of personal information overseas.</p> <p><i>Disclosure of sensitive information</i></p> <p>4.5 We only disclose your sensitive information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect or if you agree.</p> <p><i>Social media and photos</i></p> <p>4.6 We may disclose photographs, digital images, videos or other recordings and select personal information such as first name or Unit on our social media platforms, website and publications for training, promotional or publicity purpose. Photographs, digital images, videos and other recordings taken of you will not be disclosed to third parties without your consent, or where otherwise permitted or required by law.</p> <p><i>Child Safety</i></p> <p>4.7 GGV takes child safety seriously. Our Child Safe Child Friendly Framework fosters a culture of child safety throughout openness, awareness and learning. More information about our Child Safe Child Friendly Framework is here. Sometimes we will disclose personal information about our Youth Members or Adults in Guiding to address risks to child safety. There are many child safety laws and reporting requirements that can require disclosure by law.</p> <p>4.8 We disclose your personal information when required or authorised by law to comply with our legal requirements, for example to meet our child safety obligations.</p>
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	<p>5. Disclosure of personal information overseas</p> <p>5.1 As our servers are hosted in Australia, we do not disclose personal information overseas through iMIS or our Microsoft platforms.</p> <p>5.2 When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.</p> <p>5.3 We use Mailchimp for our newsletters. Mailchimp hosts its data in the United States of America. We store names, email addresses, member numbers and unit regions with Mailchimp to send you our newsletters.</p> <p>5.4 When there are international Guiding opportunities, we may disclose personal information about you to international Guiding organisations. We only disclose personal information that is necessary for the international Guiding opportunity, and seek your consent to disclose sensitive (and health) information.</p> <p>6. Quality of personal information</p> <p>6.1 To ensure the personal information we collect is accurate, up-to-date and complete, we:</p> <ul style="list-style-type: none"> (a) promptly update personal information when you tell us something has changed; and (b) allow members to update their details online through iMIS. <p>6.2 We also regularly review the quality of personal information, for example, Youth Members are asked to update their personal information annually via the Membership Renewal Form. We also review personal information when a working with children clearance is renewed.</p> <p>7. Storage and security of personal information</p> <p>7.1 GGV is committed to being a digital-first organisation to best ensure the security of the personal information we hold.</p> <p>7.2 We hold personal information on our cloud storage, on servers located in Australia, and in physical records stored at the GGV head office and in Guide halls across Victoria. Some Guide Managers and Leaders may store records at their homes when there are no secure storage options at Guide halls. We retain effective control over any personal information held on our cloud, and the information is handled in accordance with all privacy principles.</p>
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	<p>7.3 We take steps to protect the security of the personal information we hold from both internal and external threats by assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information (data breaches) and taking measures to address those risks.</p> <p>7.4 Examples of how we limit the risk of data breaches include:</p> <ul style="list-style-type: none"> (a) restrictions on who has access to different types of information (access controls). For example, Unit Leaders can only see information about Youth Members in their Guide Unit; (b) requiring digital information to be stored in GGV databases (such as iMIS), in GGV cloud systems or on GGV devices, and not locally on personal devices or in non-GGV provided cloud systems, with the exception of storing contact details on personal devices to facilitate onsite Guiding functions; (c) securing access to systems and databases via encrypted tunnels; (d) requiring complex passwords; (e) having locks on physical storage facilities such as filing cabinets or cupboard in Guide halls. <p><i>Deleting your personal information</i></p> <p>7.5 We delete personal information in a secure manner (for example, by shredding) when we no longer need it, according to our internal procedures and administration needs. Following the recommendation of the Royal Commission into Institutional Responses to Child Sexual Abuse, we do not delete or destroy any records relating to child safety and child abuse.</p> <p>8. Accessing and correcting your personal information</p> <p>8.1 You can update some of your personal information online via iMIS.</p> <p>8.2 You have the right to ask for access to personal information we hold about you and ask us to correct that personal information. You can ask for access or correction by contacting GGV, or your Unit Leader, and we will respond within 30 days. We will ask you to verify your identity before we give you access to your information or correct it. If we refuse your request, we will tell you the reasons in writing.</p>
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	<p>9. How to make a complaint</p> <p>9.1 If you wish to complain to us about how we have handled your personal information, you can contact us via the contact details below.</p> <p>Privacy Officer</p> <p>privacy@guidesvic.org.au</p> <p>Suite 812/401 Docklands Drive, Docklands VIC 3008</p> <p>03 8606 3500</p>
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