

PRIVACY POLICY

1. Purpose

This policy statement sets out the Trust's approach to managing, handling and protecting personal information it collects.

This policy will also serve to regulate and consolidate Trust procedures in relation to the handling of personal information.

2. Background

The Wellington Park Management Trust collects and uses personal information about individuals to enable it to carry out its functions under the Wellington Park Act 1993. It also has the responsibility to keep information securely so as to protect the privacy of individuals, in accordance with the Personal Information Protection Act 2004, and relevant Federal legislation.

3. Application

This policy applies to members of the Trust and all Trust staff, as well as external contractors and consultants of the Trust.

The policy covers personal information that is collected, retained, stored and used by the Trust where it is necessary for one or more of the Trust's functions or activities.

4. Definitions

Personal information is defined as information or an opinion (including information forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. It is therefore, any information which can be used to identify an individual.

Examples of personal information held by the Trust include information relating to development applications; requests to conduct recreation activities in Wellington Park, employment and volunteer position applications and infringement information.

Sensitive information is defined as information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, health information and financial status.

Staff are persons who carry out activities in a paid or unpaid capacity under the direction of the Trust to meet the Trust's objectives. Trust staff includes, but is not limited to, Trust employees, volunteers, trainees and apprentices, work experience students, and those who are formally employed by another organisation or agency (such as contractors, subcontractors, consultants) but work for the Trust under formal arrangements with the other organisation or agency that allow them to represent themselves as agents of the Trust. Staff does not include external contractors, subcontractors or consultants engaged under a contract for specific purposes where the terms of their contract does not allow them to represent themselves as agents of the Trust.

5. Policy

1.1. Privacy Officer

The Trust Manager, or another Privacy Officer appointed by the Trust, will oversee the operation of the Privacy Policy.

The Privacy Officer will liaise with individuals regarding requests, enquiries and complaints concerning personal information kept by the Trust.

1.2. Collection of personal information

The Trust is committed to upholding the right to privacy of all individuals who have business dealings with the Trust.

It is the policy of the Trust to collect personal information only if it is necessary for one or more of its functions or activities. The Trust will take the necessary steps to ensure that the personal information that individuals share with it remains confidential.

Whenever the Trust collects personal information, the information and the reasons for its collection will be shared with the affected individual upon request. Requests of this nature are to be forwarded to the Trust's Privacy Officer.

The Trust will only use personal information for the purposes for which it was collected and for any other use authorised or required by law, including law enforcement and compliance activities.

Sensitive information shall not be collected without express consent and unless the collection is required by law.

1.3. Anonymity:

Whenever it is lawful and practicable to do so, individuals will be given the option of not identifying themselves when dealing with the Trust.

1.4. Use and disclosure

Personal information will not be divulged to third parties outside the Trust for their independent use unless the person to which the information relates has authorised the Trust to do so, or the disclosure is required or allowed by law.

The Trust and its staff will not sell, trade or make available personal information to others.

Where the Trust outsources functions that involve the collection, utilisation and/or holding of personal information, these persons or organisations (including consultants, contractors and subcontractors) are required to abide this policy. The Trust will not permit third parties to sell or use the information for their own purposes.

Requests for personal information held by the Trust from police, government agencies or anyone outside the Trust, are to be directed to the Privacy Officer.

1.5. Data quality, access and correction

The Trust will take all reasonable steps to ensure that individuals' personal information is accurate, complete and up-to-date.

PRIVACY POLICY

Individuals are entitled to access personal information about them held by the Trust. Individuals are entitled to know generally what sort of personal information the Trust holds about them, for what purposes, and how it collects, holds, uses and discloses that information.

Requests for access to such information are to be made in writing and forwarded to the Trust's Privacy Officer for action. The requests will be managed in the following way.

- The Privacy Officer must establish the identity of the individual asking for the information.
- The Privacy Officer will acknowledge the request as soon as possible or at least within 7 days of the request. If granting access is straight forward, it will be granted within 14 days; if it is more complicated, access will be granted within 30 days.
- The Trust will respond to public requests to correct information in a timely manner.
- The Trust will provide written reasons when a request for access or correction of personal information is declined.

1.6. Staff responsibilities

Staff are responsible for protecting personal information from misuse, loss, corruption or disclosure. Staff will handle personal information with care, and access and use it only for authorised purposes.

All staff must maintain confidentiality of personal information and respect the privacy of individuals who have dealings with the Trust. Staff must treat all personal information as confidential, and sensitive information as highly confidential.

Trust staff will not disclose any confidential information, use any information to their personal advantage or permit unauthorised access to information.

1.7. Data Security

The Trust will take steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. This includes appropriate security standards and procedures to help prevent access to confidential information by anyone not authorised to access it. Amongst other things, these standards and procedures address physical, computer and network, communications and restricted access by staff.

Trust files containing personal information are strictly confidential and under no circumstances should a member of the public have access to files. Staff must also be conscious of security within the office environment when members of the public are present. Members of the public must not be left unattended with Trust files.

1.8. Destruction of records

Destruction of records containing personal information, including personal records is by secure means. Ordinarily, garbage disposal or recycling of intact documents are not secure means of destruction and should only be used for documents that are already in the public domain. Reasonable steps to destroy paper documents that contain personal information include shredding, pulping or the disintegration of paper. All computers that are removed from use and made available for non-Trust purposes will have all data removed from the hardware.

PRIVACY POLICY

1.9. Privacy Statement

The Trust has a Privacy Statement (attached), which is a summary of this policy, readily available and accessible to the public. There is a link to the Privacy Statement on the Trust website. Hard copies of the Privacy Statement are available on request.

1.10. Disciplinary procedures

Disciplinary measures will be taken under the Trust's disciplinary procedure if a staff member acts in contravention of this policy, particularly any failure to maintain its principles of confidentiality and privacy.

Variation of Policy

The Trust reserves the right to review, vary or revoke this policy at any time.

Approved by the Wellington Park Management Trust on: 21 February 2017

Policy to be reviewed by: July 2018



Dr Christine Mucha

Trust Chairperson