



BANYULE
UNIVERSITY OF THE THIRD AGE

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POLICY GUIDELINE- PRIVACY

Introduction

1. U3A Banyule recognises the importance of protecting the privacy of members and volunteers in relation to personal information collected from them.
2. Any questions or concerns about this policy should be referred to U3A Banyule's Secretary.

Purpose

3. The purpose of this policy is to set out the privacy rights of members and volunteers and to document the framework that U3A Banyule will apply when collecting, storing and using personal information collected from them.

Personal information

4. This policy applies to any information collected by U3A Banyule that can be used to identify an individual member or volunteer. U3A Banyule may collect and record the following types of personal information:
 - name (required)
 - postal, street and/or email addresses (required)
 - telephone contact number/s (required)
 - previous profession or occupation (optional)
 - country of origin (optional)
 - skills/languages spoken or interests (optional)
 - emergency contact details (required)
 - image (photo or video) (optional)
 - financial information (required)
 - other information members and volunteers choose to provide to us (e.g., through member surveys, course descriptions).
 - COVID vaccination status (required, but not a copy of certification)
5. U3A Banyule will collect personal information through membership and course registration processes, and in arranging contributions by volunteers. Their images may be used in U3A Banyule publications, on the website and in class recordings, subject to their willingness. Those who are not willing for their images to be shown can opt out by indicating this at the time their images are being sought. From time to time, other information may be collected for statistical purposes via a survey or by other methods. Only general statistical results will be made public and no personal information provided.
6. It is the responsibility of members and volunteers to ensure that their personal information held by U3A Banyule is complete and accurate.

Uses of personal information by U3A Banyule

7. U3A Banyule only collects personal information from members and volunteers that is necessary to provide services and perform functions that are consistent with its Constitution including:
 - delivery of classes and other activities to members
 - communication, administration, promotion and planning
 - program development, quality control and research
 - correction and maintenance of membership records
8. U3A Banyule will:
 - only collect information that is consistent with our primary purposes and the Constitution
 - inform members and volunteers that any personal information held about them is accessible to them
 - take all reasonable steps to ensure that personal information held is accurate and up to date
 - take all reasonable steps to ensure that personal information held is protected from misuse, loss and unauthorised access
9. Personal information will not be shared or disclosed other than as described in this policy. Personal information will not be made available to others for direct marketing purposes.
10. U3A Banyule may disclose members' and volunteers' personal information to:
 - Tutors, Office Assistants and the Committee of Management and its sub-committees and working parties
 - contractors or service providers

but only where it is essential for the service to be provided.

Limited personal information may also be displayed on U3A Banyule's website.

Protecting the privacy of personal information

11. U3A Banyule will take all reasonable steps to protect the privacy of its members and volunteers according to the Australian Privacy Act (1998) and the Australian Privacy Principles (APP) contained within it.
12. U3A Banyule volunteers who have roles as Committee members, Office Assistants and Tutors will not be provided with access to the U3A Banyule Dropbox account or the MyU3A back-end database unless they:
 - have been authorised by the U3A Banyule Access and Authorities Reference Group, and
 - have signed a U3A Banyule Volunteer Agreement

Access to personal information held by U3A Banyule

13. Members and volunteers may request access to any personal information U3A Banyule holds about them by contacting U3A Banyule's Secretary who will provide a suitable means of accessing the information. Members can also access their on-line member profile.
14. Members or volunteers who believe that personal information held about them is incomplete or inaccurate may ask U3A Banyule's Secretary to amend the personal information. Members can also amend the information by accessing their on-line member profile.

Breach of Privacy

15. Members or volunteers who believe that their personal information has been compromised or mis-used, whether accidentally or deliberately, should contact the Secretary as soon as possible. The Secretary will inform the Committee of Management and will refer the matter to the Privacy and Security Officer for investigation.
16. U3A Banyule will treat confidentially all requests or complaints lodged regarding this policy. U3A Banyule will contact complainants within a reasonable time after receipt of a complaint to discuss their concerns and to outline options regarding resolution. It will aim to ensure that complaints are resolved in a timely, impartial and appropriate manner.
17. All reported breaches of privacy will be fully investigated by the Privacy and Security Officer who will prepare a report for the Committee of Management. The remedies open to the Committee of Management include, but are not limited to:
 - Correction of records
 - Review of security procedures
 - Referral to Police
 - Sanctions for any members involved in deliberate breaches.
18. In the event of accidental or deliberate access to or use of U3A Banyule information by unauthorised persons, affected members and volunteers will be advised of the breach, the remediation measures to be undertaken and the steps required to revise security procedures to prevent a recurrence.

Responsibilities of the Committee of Management

19. U3A Banyule's Committee of Management is responsible for:
 - developing, adopting, implementing and publishing this policy
 - collecting, storing and using personal information in accordance with this policy
 - investigating complaints about the handling of personal information
 - responding to a suspected breach of privacy of personal information brought to the attention of the Committee of Management
 - approving access to personal information consistent with this policy
 - regularly conducting a privacy impact assessment and risk assessment
 - regularly reviewing privacy and security protocols
 - monitoring and revising this policy as and when the need arises
 - appointing a Privacy and Security Officer
20. U3A Banyule's Secretary is responsible for:
 - receiving enquiries about this policy and complaints about potential breaches of this policy
 - bringing complaints before the Committee of Management for investigation and resolution
 - responding to requests for access to personal information held by U3A Banyule, and requests to correct personal information that is believed to be inaccurate or out of date.

Authorisation

21. This Privacy Policy was adopted by the Committee of Management of U3A Banyule and minuted on 15 October 2021
22. This policy will be published by the Committee of Management of U3A Banyule on its website.

Related Documents

- Australian Privacy Act (1998)
- Australian Privacy Principles (published by the Office of the Privacy Commissioner)
- U3A Network Victoria's Privacy and Data Security Policy
- U3A Banyule's Sexual Harassment Policy
- U3A Banyule's Code of Conduct (2021)
- U3A Banyule's Constitution (2013), specifically the grievance procedure (division 3)
- U3A Banyule's Volunteer Agreement
- Terms of Reference, U3A Banyule's MyU3A Reference Group
- Terms of Reference for the Data Privacy and Security Project
- Security Policy (to be developed)
- Position Description for Privacy and Security Officer
- U3A Banyule's Terms and Conditions of Membership (2021)

Version	Status	Date
1	Endorsed by Committee of Management	16 June 2016
2	Endorsed by Committee of Management	
3	Endorsed by Committee of Management	25 October 2021