



Policy 106

Privacy including Access to Information & Member Records

Applies to:	Board Staff, Club Committee, Teachers, Inpool volunteers	
Responsibility:	General Manager	
Status :	Approved 2014	Date for review 10/2019
	Approved 10/2020	
	Updated 2/2022	
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Policy statement

Rainbow Club Australia is committed to transparency in its operations and to ensuring it is open to public scrutiny. It is also committed to protecting and upholding the right to privacy for members, staff, volunteers and other stakeholders. Rainbow Club is also committed to maintaining confidentiality when it is required to run the organisation.

Collecting, storing and disposing of Information

Rainbow Club only collects and stores personal information that is necessary for the function of the organisation and its activities. All records are stored on the Rainbow Club digital platform and disposed of after the legal requirements to keep records has expired.

Access to Information

Rainbow Club will prevent unauthorised persons gaining access to an individual's confidential records and permit individuals' access to their own records when this is reasonable and appropriate. Accordingly, access to some Rainbow Club documents and records will be limited to specified individuals who require the information to deliver a quality service to Rainbow Club members.

Obligations of Board, staff, volunteers and teachers

Rainbow Club requires the Board, staff, volunteers and teachers to be consistent and careful in the way they manage what is written and said about individuals and how they decide who can see or hear this information.

Definitions

“Governing Member” is the governing member of Rainbow Club as appointed by the Board from time to time

“Member” is a child or young adult enrolled in a Rainbow Club program

‘Staff’ includes paid Rainbow Club staff and teachers,

“Volunteers” (Board Members, Club Committee members and inpool volunteers).

Procedures

1. Transparency and Privacy

- Member records will be confidential to members and to Club Committee members, teachers and staff
- Information about members may only be made available to other parties with the consent of the member and or their parent/carer – unless it is a matter of safety or required by law.

2. Collecting, Storing, Disposing

Member Records

- Member information is collected via our website and Club Management Systems. The data collected varies from time to time and is only that required to provide a quality service to members.
- All records take account of any relevant cultural or religious sensitivities of members regarding the way information about them is collected, stored and used
- All member records will be kept securely within Rainbow Club’s Management System operated by Rainbow Club and are password protected.
- Passwords are issued to individuals based on the position they hold in Rainbow Club and different passwords provide access to different sets of data. Currently access is by user profile.
- Records are updated periodically as necessary.
- Member records will be archived when a member is no longer active in Rainbow Club
- Member records will be removed when the legal requirement to maintain records expires.

Personnel Records

- A personnel record is held for each staff member and teacher
- Teacher information is collected via our website and digitally transferred to our Salesforce system. The relevant data for payroll purposes is manually transferred to our payroll provider. The data collected is that which is required to employ, manage and pay staff.

- All teacher data is kept securely on both the Salesforce system and the payroll provider system and can only be accessed by those who have been issued with passwords based on their need to update information.
- Records and Payroll information are updated regularly.
- Teacher records are updated from time to time to ensure compliance with legislation and other professional development obligations.
- Teacher records are archived when a teacher is no longer actively working for Rainbow Club
- Teacher records will be deidentified when the legal requirement to maintain records expires.

Exceptions

Information about a member may be disclosed without their consent to prevent serious threat to the health or safety of an individual or the public.

3. Breach of Privacy or Complaint

In the event of a breach of privacy occurring, Rainbow Club will follow the four key steps in responding to a privacy breach by

- containing the effects of the breach
- evaluating the risks associated by the breach
- consider notifying affected individual
- work to prevent a repeat
- Serious breaches of privacy are reported to the Office of Australian Information Commissioner (OAIC)

If a member and/or their parent/guardian have any concerns or specific requests about the way their personal information is recorded or managed, they can liaise directly with the Rainbow Club CEO or other person designated by the CEO.

4. Organisational Information

- Board minutes will be open to governing members of the organisation once approved as a true record of the meeting by the Board, except where the Board passes a motion to make any specific content confidential.
- The minutes, papers and materials from any sub-committee meeting will only be open to Board members and relevant staff, but not to governing members of the organisation
- Access to organisation records that contain confidential or commercially sensitive information about the organisation's business are confidential and access is limited to administrative staff and Board members. This includes but is not limited to
 - ~ Financial accounts and records
 - ~ Taxation records
 - ~ Corporate correspondence with Fair Trading NSW and other Government agencies

- ~ Records of staff or other internal meetings
- ~ Project management files
- ~ Contracts between the organisation and other parties

5. Requests for access to information

Any request for access to information should be directed to the CEO or person delegated by the CEO, who will:

- Make available to staff or Board/Club Committee members information that they are entitled to access
- In considering a request, the CEO or person delegated by the CEO will take into consideration:
 - Members, teachers and staff's right to privacy
 - The relevant provision of the Rainbow Club Constitution regarding information to be made available
 - The business, legal and administrative interests of Rainbow Club, including commercial confidentiality and privacy obligations
 - Enabling members to change records they believe to be inaccurate or misrepresenting when appropriate

6. Appeals

Individuals who are refused access to their own records or information files may appeal by following the Managing Complaints and Grievances Policy (refer Policy 108).

7. Website privacy statement: Check Website privacy policies updates

myrainbowclub.org.au Rainbow Club Australia operates <https://www.myrainbowclub.org.au/> (the "Site").

This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site. We use your Personal Information only for providing and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.

Information Collection and Use

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include but is not limited to your name ("Personal Information").

Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of

your visit, the time spent on those pages and other statistics. In addition, we may use third party services such as Google Analytics that collect, monitor and analyse this data.

Communications

We may use your Personal Information to contact you by email and or with email newsletters.

Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

Security The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

Changes to this Privacy Policy

This Privacy Policy will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a notice on our website.