

Policy Guidelines 01 – Privacy

1. Introduction

U3A Hepburn Shire Inc. (U3A/HS) is a voluntary community organization providing educational, recreational and social activities for retired and semi-retired people. This policy details how U3A/HS manages the personal and confidential information that it collects from its members in the pursuance of these activities.

2. Purpose

This policy sets out the privacy rights of members and documents the framework that U3A/HS will apply when collecting, storing and using members' personal information.

3. Policy

U3A/HS recognizes the importance of protecting members' privacy in relation to their personal information. This policy applies to any information collected by U3A/HS that can be used to identify an individual member.

4. Procedures

4.1. Data Collection (IPP 1)

4.1.1 U3A/HS collects personal information directly from its members for purposes of identification, communication and funding. Personal information is collected by way of membership and course registration processes, both of which are initiated by the member and/or prospective member. The following personal information is collected and recorded about members;

- Name,
- Postal, street and/or email address,
- Telephone contact number/s,
- Emergency contact details,

- Year of birth,

4.1.2 U3A/HS will only collect information essential for the presentation of its activities that are consistent with its constitution and government requirements.

4.1.3 At the beginning of each semester, the Education Sub-Committee will provide tutors with UMAS generated “Class Attendance Rolls” and stamped self-addressed envelopes.

4.1.4 At the end of each semester, tutors are to post completed “Attendance Registers” to U3A/HS in the stamped/self-addressed envelopes provided.

4.1.5 The Secretary will collect the completed Registers from the PO Box and forward them to the Education Sub-Committee to be scanned onto an external hard drive for confidential and secure retention and then paper copies will be destroyed.

4.1.6 The Function Co-Ordinator will facilitate separate contact tracing lists for three annual functions; the Annual General Meeting and two Enrolment Days. All attendees at these functions are required to provide their name and telephone number. The completed lists are to be forwarded to the Education Sub-Committee for scanning and destruction of paper copies.

4.1.7 Tutors will be reminded on a regular basis by a representative of the Education Sub-Committee to execute the above.

4.1.8 From time to time, other personal information may be collected and temporarily retained for special projects and activities.

4.1.9 Approval to use a member’s image/s in U3A/HS publications is sought on the “Membership Application” and “Membership Renewal” forms. Members who decline to permit use of their image will be required to opt out of U3A/HS photographs.

4.2 Use and Disclosure (IPP 2)

4.2.1 Personal information is collected to enable U3A/HS to provide services and activities for its members consistent with its constitution including;

- Classes and other activities for members,
- Communication with members,
- General administration,
- Facilitate program development and planning, and
- Maintain up-to-date membership records.

4.2.2 Personal information will not be shared with or disclosed to any person or body except U3A/HS tutors and the Committee of Management and only then on a needs basis and for purposes that are directly relevant to the program and constitution.

4.3 Data Quality (IPP 3)

4.3.1 U3A/HS will take all reasonable steps to ensure that personal information held is accurate and up-to-date.

4.3.2 The integrity of all personal membership data is reviewed annually at the date of re-enrolment by the Membership sub-Committee.

4.4 Data Security (IPP 4)

4.4.1 No access will be given to personal information retained by U3A/HS without the approval of the Committee of Management and such approval will be recorded in the meeting minutes.

4.4.2 Access will only be granted for purposes directly related to the program and activities of U3A/HS.

4.4.3 All personal information is stored electronically on the User Management Administration System (UMAS), hosted by Network Victoria. Access to this data is currently restricted to select U3A/HS managers. When UMAS is fully operational, members will

be able to access their own personal data by way of a security password and unique membership number.

4.4.4 Personal data is also currently stored on personal email servers and hard copy paper files.

4.4.5 Personal details of members stored on UMAS are to remain active only so long as the individual remains a member. Personal information of former members stored on UMAS are made inactive and can only be accessed by the U3A/HS Membership Officer, other Committee members as approved by the Committee, and the Network Vic UMAS administrator. Any paper records are destroyed once information has been entered onto UMAS.

4.4.6 When corresponding to large numbers of members by way of a group email, recipients' addresses will be placed in the BCC (blind carbon copy) field in order to maintain their email confidentiality.

4.5 Openness (IPP 5)

4.5.1 This policy is available on U3A/HS's website for anyone to view. Anyone who wants a copy of this policy or to comment on it should contact the Secretary.

4.5.2 All members will be informed that any personal information relating to them which is held by U3A/HS is accessible to them.

4.6 Access and Correction (IPP 6)

4.6.1 Until UMAS is fully operational, members may request access to any personal information U3A/HS holds concerning them by contacting the Membership Officer.

4.6.2 Until UMAS is fully operational, any member who believes that such personal information is incomplete or inaccurate, can request the Membership Officer to make an appropriate amendment.

4.6.3 Where a member believes that their privacy has been breached, they should contact the Secretary and provide full details of the incident so that it can be investigated. Such matters will be treated in strictest confidence and resolved in a timely, impartial and appropriate manner. (Ref Grievance Policy 06)

4.7 Unique Identifiers (IPP 7)

4.7.1 U3A/HS assigns unique numerical identifiers to its members for security purposes when logging into UMAS.

4.7.2 U3A/HS does not collect unique identifiers from other sources in relation to its members.

4.8 Anonymity (IPP 8)

4.8.1 Personal identification is essential for the presentation of U3A/HS' program.

4.9 Transborder Data Flows (IPP 9)

4.9.1 Whilst unlikely that U3A/HS will need to pass individual private information interstate or overseas, if such transfer was required it would be done with the strict consent of the individual member/s.

4.10 Sensitive Information (IPP 10)

4.10.1 Additional private and possibly sensitive information, other than that listed at para 4.1.1, may sometimes be needed for special projects/activities. Such information will be collected and retained only for the life of the project with the strict consent and involvement of the individual member/s.

5. Responsibilities

5.1 The Committee of Management is responsible for:

- developing, adopting, implementing and publishing this policy
- collecting, storing, using and removing members personal information in accordance with this policy

- investigating complaints about the handling of personal information
- approving access to personal information consistent with this policy
- monitoring and revising this policy as and when the need arises.

5.2 The Secretary is responsible for:

- receiving enquiries about this policy and complaints about a potential breach of this policy,
- bringing a complaint before the Committee of Management for investigation and resolution.

5.3 The Membership Officer is responsible for;

- responding to a member's request for access to personal information held by U3A/HS about that member and for requests to correct personal information that is believed to be inaccurate or out of date.

6. Authorisation

6.1 This policy was adopted by the Committee of Management of U3A Hepburn Shire, and minuted as such, on 7 Dec 2020.

6.2. This policy will be published by the Committee of Management of U3A Hepburn Shire on its website within 4 weeks of the date of this authorisation.

7. Related Policies

Risk Management

Grievance

(This Policy was revised 7 Dec 2020 in accordance with the requirements of Schedule 1 to the Data Protection Act 2014).