



## **Section 1: Management**

### **Module 5: Privacy Policy**

#### **Purpose and Statement of Commitment**

BUGS Gymnastics endeavours to ensure impeccable behaviour of all gymnasts, coaches, spectators, administrators' and officials. Providing a safe, friendly and enjoyable environment for everyone involved.

Our focus is to provide a safe friendly environment for children to develop basic gymnastic skills. To offer a variety of gymnastics programs to suit children of all ages and abilities and to encourage a healthy attitude towards participating in physical activity. BUGS gymnastics has a commitment to provide a quality program with qualified and accredited coaches and staff.

#### **Definitions and Policy Coverage**

BUGS Gymnastics is committed to providing you with the highest levels of membership service. This includes protecting your privacy.

BUGS Gymnastics is bound by the Commonwealth Privacy Act 1988, which sets out a number of principles concerning the protection of individual's personal information. The aim of these laws is to ensure that organizations handle personal information responsibly and provides a consistent approach to its collection, use and disclosure. These laws also give the individual rights such as access to their personal information and the ability to correct it, if needed.

##### **1. What is Personal Information?**

Personal information is defined in the Privacy Act as information or an opinion (including information or an opinion 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.

##### **1.1. What is an Organisation?**

- an individual; or
- a body corporate; or
- a partnership; or
- any other unincorporated association; or
- a trust; or
- that is not a small business operator, a registered political party, an agency, a State or Territory.

##### **1.2. What Information will be covered?**

All personal information gathered by, or on behalf of, BUGS Gymnastics for the purpose of managing membership, education, events and merchandise.

#### **Policy Application**



This Policy applies to all members of BUGS Gymnastics employees, officers, administrators, volunteers, coaches, judges, athletes and officials (Members);

This Policy applies equally to Members involved in each of BUGS Gymnastics gymnastic disciplines, including Women's Artistic Gymnastics, Kinder Gym

This Policy applies to behaviour occurring both within and outside the course of the club, activities and events, when the behaviour involves Members and negatively affects relationships within the clubs sport and work environment.

### **Requirements and Responsibilities**

We will only collect information that is necessary for us to carry out our primary purpose of providing services relating to: membership, education, events and merchandise. Your personal information may be used in order to:

- Provide the services you require
- Internal accounting and administration
- Regulatory reporting and compliance
- Help us to identify and inform you about other products or services that may be of benefit to you.

If you choose not to provide personal information, we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.

### **Disclosure of Personal Information**

We disclose personal information to other organizations that we believe is necessary to assist in providing our services. The organizations to which we disclose information include:

- Insurers
- Australian Gymnastics Federation
- Gymnastics Victoria
- Our professional advisors, including our accountants, auditors and lawyers
- Government and regulatory authorities and other organisations, as required or authorised by law.

We limit the use and disclosure of any personal information provided by us to such organizations for the specific purpose for which we supplied it.

### **Storage and Supply of Personal Information**

BUGS Gymnastics stores personal information on a computer database and hard copy file. Your personal information may be held in both paper file and computer file form. We have implemented measures of a reasonable nature to ensure that all personal information about you is securely stored from misuse, loss and unauthorized handling.

### **Access to Personal Information**

You have a right to access your personal information, subject to some exceptions allowed by law. If you would like to do so, you can gain access to your personal information by contacting our Office. Alternatively, you may also advise us at any time about possible breaches of privacy, or inaccurate, incomplete personal information that BUGS Gymnastics may have. We take reasonable steps to ensure that whenever we collect, use or disclose personal information that it is accurate, complete and up to date.



## **Policy Breaches and Consequences**

### **Procedural Steps**

BUGS Gymnastics undertakes to deal with any complaints of a breach of the Member Protection Policy promptly, seriously, sensitively and confidentially. At any stage, it is the prerogative of the Complainant to proceed with, or dissolve, a complaint.

### **Discussion**

Should a complaint arise, BUGS Gymnastics encourages the Complainant to consider the following options:

- Approach the person creating the problem and ask him or her to stop the behaviour
- If the behaviour continues, or it is not possible to approach the person, contact either:
  - a) Coach
  - b) The Club's Manager
  - c) President and Committee

### **Club Manager**

If the Complainant decides to proceed, the Coach refers the matter to the Manager for investigation. The Club Manager determines whether or not to investigate the complaint. If the Club Manager determines to investigate, the Manager:

- Informs the alleged wrongdoer;
- Interviews both parties separately;
- Keeps confidential records of the process;
- Attempts mediation to achieve resolution; &
- Follows up on the Complainant.

### **Disciplinary Committee**

If no resolution is achieved, the Club Manager gives all reports to the Committee, who determines the appropriate course of action.

### **Confidentiality and Reporting**

BUGS Gymnastics administration responsible for implementing this Policy will keep confidential the names and details relating to complaints, unless disclosure is:

- Necessary as part of the disciplinary or corrective process; &
- Required by law.