



THE ORDER OF AUSTRALIA ASSOCIATION

G8 PRIVACY POLICY

Policy identifier	G8
Version	1.0
Drafter	M. Crane
Approved by committee on	N/A
Approved by board on	
Scheduled review date	June 2020
Document ownership	Audit & Risk Committee

Table of Revisions

Version	Date	Reason for Modification	Person Responsible
1.0	Apr 2019	First draft	M. Crane
2.0	Nov 2020	Minor Updates	Audit & Risk
3.0	Jan 2021	Current Access Form	National Membership Director

1. Introduction

1.1 Overview

The Order of Australia Association (the Association) is committed to protecting personal information that it collects stores and administers.

1.2 Purpose

The purpose of this document is to provide a framework for the Association in dealing with privacy considerations.

1.3 Applicability

The policy and procedures outlined in this document apply to all officers and members of the Association.

1.4 Legislative/Regulatory Requirements

Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs)

Relevant state and territory legislation may also apply.

1.5 Definitions

Officer of the Association: A director of the Association, a member of a Branch or Regional Group Committee, a staff member, or a volunteer acting on behalf of the Association.

Personal Information: Information that directly or indirectly identifies a person.

2. Policy Statement

The Association collects stores and administers a range of personal information for the purpose of providing member services and is committed to protecting such information.

The Association recognises the essential right of individuals to have their information administered in ways they would reasonably expect – protected on one hand, and made accessible to them on the other.

The Association is not formally bound by the *Privacy Act 1988 (Cth)* since our annual turnover is below the applicable threshold.¹ Nevertheless, we will make every effort to comply with the intent of the *Act*, including the Australian Privacy Principles.

3. Responsibilities

The Board is responsible for ensuring that an appropriate privacy policy is in place and appropriate compliance.

All officers of the Association are responsible for managing the privacy of stakeholders in accordance with this policy.

¹ <https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles>

4. Procedures

4.1 Collection

The Order of Australia Association collects personal information about individuals including its members, new recipients of honours and awards in the Order of Australia, employees and other stakeholders.

The Association will only collect and hold personal information that is reasonably necessary for the performance of its services as a not-for-profit association. For most members, this information will include an individual's title, names, nature of honour or award, residential and/or postal address, email address, telephone numbers, gender, birth year and type of membership.

For employees, contractors, suppliers and officers of the Association, we may also collect information about work history, referees and any other information submitted in a job application, a contract bid or as part of a fit and proper person check.

The Association will usually collect a member's personal information directly from the member and with the member's explicit consent, either through a membership application or updates provided by the member. We will only collect a member's personal information from someone else if we have the member's consent, or if it is authorised or required by law, or if it is unreasonable or impractical for us to collect that information from the member (for example, when a family member advises us of an infirm member's change of address/circumstances).

The Association collects a new recipient's personal information from Government House, Canberra. This information is limited to an individual's title, names, nature of and reason for the honour or award, and residential or postal address.

4.2 Use and Disclosure

The Association will only use or disclose personal information for the primary purposes for which it was collected or directly related secondary purposes that the individual concerned would reasonably expect (or that we have advised) or as permitted or required by law. If there is any doubt about this expectation, we will obtain the individual's consent before using or disclosing the information for a secondary purpose.

Officers of the Association with access to Association databases must be cognisant of their responsibility to protect stakeholder information. Prior to being given access to the databases, officers of the Association must complete the undertaking at Annex A and forward it to the National Membership Officer.

The purposes for which we may use or disclose personal information include:

1. Provision of member services:

The Association uses personal information for the primary purpose of providing member services. This information will be shared by the Association with the relevant Branch and (if applicable) Regional Group to facilitate local service delivery. For Europe and United States residents, this may include sharing information with the relevant overseas Regional Group.

2. New recipients:

The Association uses personal information of new recipients for the primary purposes of congratulating them on their honour or award and inviting them to join the Association.

3. Employees:

The Association uses and discloses personal information about its staff in order to perform its obligations as an employer and as required by law.

4. Contractors and suppliers:

The Association may collect personal information about contractors and suppliers that provide services to the Association for the primary purpose of assessing and engaging their services or expertise and for other purposes where legally required.

5. Order of Australia Association website:

When a stakeholder visits the Association's website, we do not attempt to identify that individual or store his/her personal information. We will only collect and store an individual's personal information if he/she chooses to provide it via an online form or by email, for example through a 'Contact' page.

We note that our website provider makes a record of each visit to our website and logs the following information for statistical purposes:

- server address;
- top level domain name (for example, .com, .gov, .au, .org);
- date and time of visit;
- pages and documents accessed; and
- type of browser used.

This information is only used to evaluate the effectiveness of our website but, in the event of an investigation, a law enforcement agency or other government agency may exercise its authority to inspect the logs maintained by our website provider.

Our website uses temporary cookies for security purposes. The cookies do not identify the individual user, but do identify the internet services provider and browser type. This means we do not store any personal information from visitors to our website.

Our website contains links to websites of third parties. We are not responsible for the privacy policies or practices of such third party websites.

4.3 Storage

The Association may store personal information in electronic systems, paper files or images.

All information collected by the Association will be stored securely. The Association will:

- take steps to protect the personal information we hold against interference, misuse, loss and unauthorised access; and
- before disclosing any personal information to an overseas recipient including a provider of information technology services, such as servers or cloud services, establish that they are compliant with our privacy policy and the APPs.

When personal information is no longer required, it will be destroyed, deleted or de-identified securely in line with our records management policy.

Personal information relating to new recipients who do not join the Association will be destroyed, deleted or de-identified no later than 24 months from the date of the honours list in which the recipient was named.

4.4 Data Quality

The Association will take reasonable steps to ensure that the personal information we collect and hold is accurate, complete and up to date. We maintain and update the personal information we hold as necessary or when stakeholders advise us that their personal information has changed.

4.5 Access and Correction

Stakeholders who wish to access or amend their personal information should make a request in writing to the National Membership Officer. Requests may be made by post, email or online form. Our full contact details can be found on our website at: <https://www.theorderofaustralia.asn.au/contact-us/>.

We will respond to requests for access or amendment within a reasonable period. We will provide access or make the correction requested unless otherwise required or where we are permitted by law to withhold the information or not make the amendment. We will notify the individual of the basis for any denial of access or amendment to personal information.

Where we allow access, the relevant officer of the Association will arrange to give the stakeholder access in the manner requested if it is reasonable or practical to do so. The manner of access may be by email, phone, in person, hard copy or by electronic means.

If we agree that the personal information requires correction or amendment, the relevant officer of the Association will make the alterations or notation. If we do not believe an amendment is necessary, the stakeholder may insert an addendum into the record.

4.6 Complaints

Stakeholders who have concerns about their privacy or wish to make a complaint about a privacy breach should contact the National Secretary.

The complaint should be made in writing and should provide sufficient details together with any supporting material.

On receipt of a complaint, the Association will take steps to investigate and advise the complainant of the outcome. The relevant officer of the Association may contact the complainant by telephone or arrange to meet personally. Alternatively, we may respond in writing depending on the complexity and nature of the matters in dispute. The Association will endeavor to respond to complaints within a reasonable period.

If a stakeholder is not satisfied with our response, we can be contacted to discuss the matter further. Alternatively, the stakeholder can complain to the Office of the Australian Information Commissioner (Cth) via the website: www.oaic.gov.au.

5. Related Documents

This Policy is to be read in conjunction with:

- Constitution of the Order of Australia Association
- By-Laws of the Order of Australia Association
- A1 Records Management Policy
- G3 Board Renewal Policy

Annex:

OAA Access and Non-disclosure of Information Form dated January 29, 2021

ACCESS and NON-DISCLOSURE of INFORMATION FORM

As at January 29, 2021

Branch Office Bearers of the Association with access to our databases should be aware of our **G8 Privacy Policy** and the provisions of the relevant Privacy Act applicable to their Branch (State or Territory).

The databases include Order of Australia Honours Recipients Australia Day and Queens Birthday and Association Membership, the data is not to be used for private or commercial purposes.

Please complete the form below.

Note a maximum of four (4) Office Bearers including Chairman, Secretary and Membership Secretary per Branch will have access to databases.

Form to be completed and emailed to National Membership Director within ten (10) working days of Branch **2021** Annual General Meeting

Email: natmbrdir@theorderofaustralia.asn.au

By signing below, I express my understanding and agreement of the following:

- I will not disclose any information of the Order of Australia or the Association to any unauthorised person or third party without the prior approval of the National Chairman or National Membership Director in writing.

- I understand that the databases are not to be used for private or commercial purposes.

BRANCH _____

POSITION _____

NAME _____

ADDRESS _____

_____ P/code _____

EMAIL _____

Thank you for the work you do for The Order of Australia Association (OAA).

Signed _____ Date _____

There is a similar form for Regional Group Office Bearers available from National Membership Director