

AGTV Privacy Policy

The Association of German Teachers of Victoria Inc. (AGTV) is committed to protecting the privacy of members and others who use our services.

Personal information is information which directly or indirectly identifies a person.

Purpose

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

Policy

The AGTV collects and uses personal information for the purposes of managing memberships, running events and providing services. The AGTV is committed to protecting the privacy of personal information it collects, holds and administers.

The AGTV is bound by laws which impose specific obligations when it comes to handling information. The Committee has adopted the following principles contained as minimum standards in relation to handling personal information.

The AGTV will:

- conduct risk assessments of third-party service providers used to collect, store or share personal information;
- collect personal information required to plan or provide services;
- ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- use and disclose personal information with the person's consent for our primary functions or other purpose known to the person;
- disclose personal information without consent to comply with a legal obligation;
- obtain consent to use images of individuals on digital platforms or in print publications;
- take reasonable steps to prevent unauthorised access to or use of personal information;
- provide stakeholders with access to their own information, and the right to seek its correction.

Privacy Procedures

Responsibilities

The Committee is responsible for developing, adopting and reviewing this policy and for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

Processes

Collection

The Committee will:

- only collect personal information that is necessary for the purpose of managing memberships, running events and providing and evaluating services;
- notify stakeholders about why we collect the information and how it is administered;
- notify members* and others how to access and update their personal information;
- collect personal information from the person themselves wherever possible;
- collect information regarding Working With Children clearance;

- only take or share images of individuals with their consent, and if images of children or young people, with the additional written consent of their parent/guardian.
- only collect sensitive information* with consent from individuals (including children and young people and their families) who are accessing our services to use for a lawful purpose to provide services (*Sensitive information includes health information necessary to prevent or lessen a serious threat to life or health of individuals).

***Note:** The AGTV member online management system identifies an individual by their personal email address registered on our system. Members can access their profile by logging in with this email and their personal password to register for member rates or update their details.

Use and disclosure

The Committee will only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose, or to comply with a legal obligation.

AGTV members, support staff and volunteers must not share personal information without the knowledge and consent of individuals concerned.

The Committee will use personal information:

- to maintain an accurate record of members;
- to communicate directly with members and others accessing our services;
- to determine eligibility for services provided by the AGTV;
- to promote, plan, deliver, report on and evaluate events or services provided by the AGTV;
- to create and disseminate invoices for membership and services;
- to disseminate information, publications and other related correspondence;
- to notify members of goods or services offered by a third-party;
- for other uses only with the consent of the individual/s concerned.

The Committee must not disclose personal information to others without the consent of the person unless it is to comply with a legal obligation.

AGTV BJR Student Exchange

The AGTV is a registered Student Exchange Organisation (SEO) with the Victorian Registration and Qualifications Authority (VRQA) and must comply with their regulations and Child Safe Standards including mandatory reporting.

Personal information related to exchange students and host families in Victoria and Bavaria is shared between the AGTV and the Bayerischer Jugendring (BJR) in Germany for the purpose of conducting the AGTV BJR exchange program.

Like the AGTV in Australia, the BJR must comply with the privacy law in the free state of Bavaria and federal privacy law of Germany.

To comply with privacy laws, at the end of each exchange round, the AGTV and BJR must delete information stored on computers and cloud services and destroy print documents, with two exception:

- the AGTV is required to keep details of a critical incident for at least 2 years after the specific incident occurred, and
- The AGTV Coordinator keeps a register of the host families' email address for future correspondence with exchange alumni.

Data Quality

The Committee will:

- take reasonable steps to ensure the information collected is accurate, complete, up-to-date, and relevant to the functions we perform;

- advise members and others accessing our services to update their information personally or notify the Committee in writing of any change to information they have previously supplied.

Storage and security

The Committee will:

- conduct risk assessments of third-party providers used to collect and store information;
- will have systems which provide sufficient security for information stored on computers;
- ensure information is kept in compliance with the legal obligations of an incorporated association and any other legal obligation imposed on the Association;
- take reasonable steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure;
- before disclosing any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant;

Data Retention

The Committee collects and retains information to comply with:

- AGTV policies and procedures;
- requirements of being a registered SEO with the VRQA;
- legal obligations including those related to the AGTV being an incorporated association.

The Committee will delete or destroy records in accordance with the AGTV Recordkeeping Policy.

Breach of Privacy

The Committee will take action when:

- a breach of privacy is detected by the Committee or support staff;
- a concern or complaint about privacy is received;
- notification of a breach of privacy related to a third-party is received.

Actions taken may include:

- notifying the person/s of the breach;
- directing the person/s responsible to delete any data accessed;
- taking steps to secure data (e.g. changing passwords, or removing data);
- notifying authorities of a breach;
- reviewing risk assessment plans and procedures.

All incidents must be recorded and reported to the Committee.

Concerns or Complaints

Members and others who want to express a concern or make a complaint can email the Committee:

- complaints@agtv.vic.edu.au

Related Policies

- AGTV Code of Conduct
- Digital Media Policy
- AGTV BJR Student Digital Code of Conduct
- Recordkeeping Policy
- Child Safety and Wellbeing Policy
- Complaints and Appeals Policy

Resources:

- Office of the Victorian Information Commission
<https://ovic.vic.gov.au/privacy/for-the-public/your-privacy-rights/>
- Child Safe Standards: <https://ccyp.vic.gov.au/child-safe-standards/>