

PRIVACY POLICY

Association Manual **1.12**

1. INTRODUCTION

Orienteering NSW (ONSW) takes the privacy of its members seriously. This policy outlines the purpose of personal information collection and its use within ONSW.

2. IMPLEMENTATION

2.1. The ONSW Secretary shall be the Privacy Officer of the Association with responsibility for the administration of this policy and the development and management of appropriate practices in accordance with the policy.

2.2. ONSW Privacy Policy is compatible with and operates under the umbrella of the Orienteering Australia (OA) Privacy Policy (Operations Guide, Edition 6, Section 1.26).

3. USE OF PERSONAL INFORMATION

3.1. Within ONSW and its member clubs, personal information is collected for several purposes, including:

- 3.1.1. Membership registration data / information;
- 3.1.2. Event registration (entry forms) and results;
- 3.1.3. Team / squad registration (including health and medical details);
- 3.1.4. Team / squad / officials feedback forms;
- 3.1.5. Surveys (carried out from time to time);
- 3.1.6. Applications for positions within ONSW;
- 3.1.7. Employee information;
- 3.1.8. Volunteer information including that for board and committee members;
- 3.1.9. Photographs of orienteers (to be used in publications, publicity, etc.);
- 3.1.10. Provision of information to and from associations/agencies including but not limited to:
 - a) Orienteering Australia (OA);
 - b) Australian Sports Foundation;
 - c) NSW government and its agencies, including NSW Office of Sport and Office of the Children's Guardian;
 - d) Sports Integrity Australia and other anti-doping organisations;
 - e) Australian Sports Commission.

3.2. The above can include information in printed or electronic form, including on websites.

- 3.3. In the collection of information for the purposes outlined in clause 3.1:
- 3.3.1. Information must only be collected that is necessary, lawful, and practicable.
 - 3.3.2. The details of the organisation / representative collecting information must be disclosed together with the purpose/s for collecting the information.
 - 3.3.3. Where practicable, the person providing the information shall be given the opportunity to remain anonymous, and not be included in publicly available documents such as membership directories.
 - 3.3.4. Individuals must be advised on:
 - a) their right to access files in which their personal information is included.
 - b) their right to inspect and if necessary, correct any of the information held regarding their personal data.
 - c) their right to complain about possible breaches of privacy.
 - 3.3.5. Where sensitive information (refer to Appendix 1) is required, such as for teams travelling interstate or overseas, individuals should be informed of:
 - a) the necessity to provide all the required information;
 - b) the risks to them if the requisite information is not provided;
 - c) how the information is retained; and
 - d) after what period the information will be destroyed.
- 3.4. Unless directed otherwise by a member, information contained in membership databases relating to that member may be shared between ONSW, OA and the club of that member. An individual's membership status may also be disclosed to event organisers and other authorised officials for purposes such as ascertaining that individual's eligibility for competition, or for other rights or privileges of membership (such as reduced entry fees).
- 3.5. ONSW and clubs publish, from time to time, photographs of participants in orienteering events in printed publications, on websites or through social media channels. ONSW will, upon request by an individual or their parent/guardian (either prior to or after publication), remove, de-identify or not publish such photographs.
- 3.5.1. Further material relating to photography, particularly of minors is contained in the OA Photography Policy, Operations Guide Edition 6, Section 1.28.

4. DISCLOSURE

- 4.1. Except as provided for in clauses 3.1 and 3.4, ONSW will not disclose information to any other person or organisation except where there is a legal requirement to do so, (such as requirements under state incorporation laws relating to register of members), the individual specifically consents to do so, or where ONSW adopts a specific policy to do so.

5. EVENTOR PERMISSIONS AND USAGE

- 5.1. Orienteering Australia (OA) is the license holder of Eventor (membership and event management system) in Australia. To ensure license compliance with the Swedish Orienteering Federation, OA's permission and usage policy is outlined in the OA Eventor Permissions and Usage Policy, Operations Guide Edition 6, Section 1.27.

5.2. Permissions:

- 5.2.1. Eventor has a hierarchical permission system with clubs being related to a member state/territory and each member state/territory being related to OA as shown in the following diagram.



- 5.2.2. Administrators at a specific level can create administrators at that level and below. For example, an administrator at ONSW level can assign administrator rights at ONSW level and/or club level (to a particular ONSW affiliated club).
- 5.2.3. There are 6 permission types available in Eventor:
- Super Administrator** - Only available at OA level. Can add/edit permissions/events at any level. Capable of seeing details of any registered person in Eventor.
 - Finance Administrator** - Only available at OA level.
 - Administrator** - Can add/edit permissions/events at the nominated level and any levels below. Only administrators can assign permissions to individuals and view detailed information about them.
 - Event Organiser** - Can create/edit events at the nominated level and any level below.
 - Entry Manager** - Can administer event entries at the nominated level and any level below.
 - Member** - The basic permission type. At a club level, a member can create an event. A member is unable to view details of any other member.
- 5.2.4. Administrator level permissions will only be granted to those individuals who comply with the requirements of the ONSW Safeguarding Children and Young People Policy, ONSW Manual Section 1.10.
- 5.2.5. Managing Eventor permissions is the responsibility of each member state/territory/club. ONSW allows each member club to manage permissions within the process defined here:
- It is recommended that managing permissions should be reviewed annually as part of the AGM or the first meeting thereafter by each member club.
 - Relevant permissions should be granted to facilitate management of ONSW and club activities without having to rely on a single individual.
 - Where a person has access to the personal information of a person under

the age of 18 they shall be required to comply with the requirements of the NSW Safeguarding Children and Young People Policy, NSW Manual Section 1.10.

- d) Those with permissions will adhere in full to the NSW Privacy Policy, NSW Manual Section 1.12.

5.3. Eventor Usage Directive:

- 5.3.1. Orienteering Australia (OA), as the license holder of Eventor in Australia, mandates that the events listed on Eventor are for the sole purposes of promoting orienteering and orienteering events by a member state/territory of OA, as defined in Clause 5.3 of the OA Constitution, and the affiliated clubs of that member state/territory.
- 5.3.2. Third party organisations, such as regaining associations and commercial organisations, and third-party events must not be listed unless approved by the Board and authorized in writing by the General Manager of OA.
- 5.3.3. OA must be consulted with regards to the consideration of any activity within Eventor outside the scope of this directive.

Related documents:

OA Privacy Policy, Operations Guide Edition 6, Section 1.26; Effective October 2023

OA Photography Policy, Operations Guide Edition 6, Section 1.28

OA Eventor Permissions and Usage Policy, Operations Guide Edition 6, Section 1.27; Effective October 2023

The above policies are available at <https://orienteering.asn.au/resources/operations-guide/>

Adopted 28 May 2024

Reason for update:

NSW Privacy Policy is outdated (2003). This policy is being updated in accordance with current OA Privacy Policy (effective Oct 2023) and to incorporate current policy and state level procedure surrounding Eventor permissions and usage.

Appendix A: Sensitive Information

The Australian Privacy Act 1988, as amended by ACT No 44 of 2020 defines sensitive information as described here.

sensitive information means:

- a. Information or an opinion about an individual's:
 - I. racial or ethnic origin
 - II. political opinions
 - III. membership of a political association
 - IV. religious beliefs or affiliations
 - V. philosophical beliefs
 - VI. membership of a professional or trade association
 - VII. membership of a trade union
 - VIII. sexual orientation or practices
 - IX. criminal record; that is also personal information.
- b. Health information about an individual.
- c. Genetic information about an individual that is not otherwise health information
- d. Biometric information that is to be used for the purpose of automated biometric verification or biometric identification.
- e. Biometric templates.