



**THE POLICE
ASSOCIATION
VICTORIA**

Privacy Policy

Protect. Support. Advance.

Date of Issue:
Approval Authority:

Document Owner:
Reviewed by:

Last Review:
Next Review:

1. Policy Objectives

- 1.1 The Police Association Victoria (**the Association**) is the organisation representing sworn police officers at all ranks, protective services officers, police reservists and police recruits who serve in Victoria Police. The Association collects personal information in order that it might conduct the business of advancing and representing the industrial, legal, professional and welfare interests of its members. The Association operates in the political, legal, industrial and social spheres.
- 1.2 The Association is committed to protecting your privacy and providing you with information and services relevant to you. The Association complies with the *Privacy Act 1988 (Cth) (Privacy Act)* as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and the Australian Privacy Principles (**APPs**). This Privacy Policy (**Policy**) should be read in conjunction with the Privacy Act and the APPs.
- 1.3 In this Policy, reference to the Association includes The Police Federation of Australia (Victoria Police Branch), the VPA Friendly Society and The Police Association (Victoria) Benefit Fund (administered by Foresters Friendly Society).

2. Application

- 2.1 This Policy applies to personal information the Association collects from you:
 - via our website
 - via our mobile app
 - via social media;
 - via telephone;
 - via email;
 - in person; and/or
 - in writing.
- 2.1 This Policy also applies to personal information the Association collects about you from any third party.

3. The Police Association Website

- 3.1 The Association's website collects two types of information. The first type is anonymous information. The web server makes a record of your visit and logs the following information for statistical purposes:
 - the user's server address;
 - the user's top-level domain name (e.g. com, .gov, .net, .au, etc.);
 - the date and time of the visit to the site;
 - the pages accessed and documents downloaded;
 - the previous site visited; and
 - the type of browser used.
- 3.2 The Association will identify members based on their activities when interacting with The Association's services and domains by using 'cookies'. This information will be used to better understand what is important to our members so that we can tailor each member's experience. This information will not be shared with any third parties,

except in the unlikely event of an investigation when a law enforcement agency may exercise a warrant to inspect the internet service provider's logs.

- 3.3 A cookie is a small text file that a website may place on your computer. Cookies may be used, among other things, to track the pages you have visited, to remember your preferences and to store personal information about you.
- 3.4 You can adjust your internet browser to disable cookies or to warn you when cookies are being used. However, if you disable cookies, you may not be able to access certain areas of the website or take advantage of the improved website experience that cookies offer.
- 3.5 The Association's websites may contain links to other websites and social media pages. The Association is not responsible for the privacy policies of the entities responsible for those websites and recommends that you review the privacy policies applicable to any other websites you visit.

4. The kinds of information the Association may collect

- 4.1 From time to time you may voluntarily supply your personal information to the Association. The Association will record your e-mail address and other details, such as your member number and name, if you send us a message, subscribe to an email newsletter, or complete a form on which this information is requested.
- 4.2 When you provide your personal information, it allows us to, among other things, assist you with industrial relations queries, assist with legal/discipline issues, inform you about industrial, social and political campaigns, assist with booking a holiday home, and accept your application for membership. You may supply personal information to the Association by, for example, responding to a survey, filling in a meeting attendance sheet, taking part in a competition, completing a membership form, discussing your issues with a delegate, submitting an application to book a holiday home, or signing up to a campaign. The Association only collects personal information that is necessary for the Association to perform its functions and/or activities.
- 4.3 Depending on the circumstances, you may provide to the Association - and the Association may collect - information such as, but not limited to:
 - your name;
 - your contact details;
 - your social media details (e.g. blogs, twitter, Facebook, LinkedIn);
 - your gender;
 - your marital status;
 - your employment details;
 - your educational qualifications; and
 - an inquiry or complaint made by you, to us.
- 4.4 Some personal information is considered sensitive and includes:
 - your political opinions;
 - your political party membership (if any);

- your union membership (if any);
 - your racial or ethnic origin;
 - your sexual orientation;
 - any disabilities, illnesses or injuries you may have; and/or
 - any other health information.
- 4.5 The Privacy Act allows the Association to collect sensitive information which relates solely to Association members, or people who have regular contact with the Association, if the sensitive information relates to the Association's activities. We will only collect sensitive information where we have received your consent to your personal information being collected, used, disclosed and stored by the Association in accordance with this Policy.
- 4.6 Where you provide information to the Association in relation to a job application, the personal information you provide will only be collected, held, used and disclosed for the purposes of considering your potential employment with the Association, both at the present and during the selection process for any future vacancies that might arise. Where you provide the details of referees, you confirm that you have informed the referees that you are providing their contact information to the Association and they have consented to the Association contacting them and discussing the personal information you have provided in relation to the job application.
- 4.7 We will not collect personal information directly from you unless:
- you have consented to the Association's collection of your personal information from third parties; or
 - we are legally required to do so; or
 - it is unreasonable or impractical not to do so.
- 4.8 Where we have collected personal information about you either directly or by other means as set out above, we will notify you at the time, or as soon as practicable, to ensure that you are aware of such collection and its purpose.
- 4.9 You can choose to interact with us anonymously or by using a pseudonym, where it is lawful and practicable. For example, you may wish to participate in a blog or enquire about a particular campaign anonymously or under a pseudonym. Your decision to interact anonymously or by using a pseudonym may affect the level of services we can offer you. For example, we may not be able to assist you with a specific industrial enquiry or investigate a privacy complaint on an anonymous or pseudonymous basis. We will inform you if this is the case and let you know the options available to you.
- 4.10 If we receive unsolicited personal information about or relating to you and we determine that such information could have been collected in the same manner if we had solicited the information, then we will treat it in the same way as solicited personal information and in accordance with the Australian Privacy Principles. Otherwise, if we determine that such information could not have been collected in the same manner as solicited personal information, and that information is not contained in a Commonwealth or State government record (e.g. Victoria Police Gazette), we will, if it is lawful and reasonable to do so, destroy the information or

de-identify the information.

5. The purposes for which personal information is collected, held, used and disclosed

5.1 The Association collects, holds, uses and discloses your personal information to:

- assist you with industrial relations and employment queries;
- inform you about industrial, social and political campaigns;
- inform you about your rights at work;
- inform you about changes to legislation;
- refer you to a legal practitioner, accountant or other professional;
- improve our service delivery;
- manage our relationship with you;
- conduct surveys and research;
- provide educational services and professional development;
- conduct Association elections;
- assist with legal/discipline issues;
- provide welfare assistance;
- manage holiday home bookings for you.

6. Using your information for direct marketing

6.1 You consent to our use and disclosure of your personal information for the purposes of direct marketing, which may include providing you with information about events, products or services which may be of interest to you.

6.2 If you do not want us to use your personal information for direct marketing purposes, you may elect not to receive direct marketing at the time of providing your personal information.

7. Unsubscribing and opting out

7.1 If you no longer wish to receive direct marketing or other communications, you may request at any time to cancel your consent to such communications as follows:

- If subscribing to an email newsletter, you may 'unsubscribe' at any time from the newsletter mailing list by sending an email to TPAV Member Support Centre (general@tpav.org.au);
- The Association may, from time to time, send you text messages about issues of importance such as events or campaigns. You may "opt out" by sending an email to TPAV Member Support Centre; or
- You may contact us at any time by mail or email directed to our TPAV Member Support Centre.

8. Disclosure of your personal information

8.1 The Association may disclose your personal information, in connection with or to further the purposes outlined above, to:

- government bodies or agencies (including the Fair Work Commission, the Fair Work Ombudsman, the Australian Tax Office, an anti-discrimination body or a work/occupational health and safety regulator);
- organisations to whom we outsource functions (including information technology providers, print service providers, mail houses, Foresters Friendly Society;
- otherwise as you have consented; and/or
- otherwise as required by law.

8.2 We do not currently deal with organisations located outside Australia.

8.3 We take reasonable steps to ensure that each organisation that we disclose your personal information to is committed to protecting your privacy and complies with the Australian Privacy Principles or is subject to a law or scheme that is at least substantially similar to the way in which the Australian Privacy Principles protect information.

8.4 By providing your personal information to the Association, you consent to us transferring your personal information to such other organisations.

9. How the Association holds personal information

9.1 Wherever reasonably practicable, the Association holds electronic personal information on data servers that are owned and controlled by the Association in Australia. The data servers are password protected and login secured. However, by providing personal information to the Association you consent to your information being stored and processed on a data server or data servers (e.g. cloud services) owned by a third party or third parties that may be located outside of Australia. The Association will take reasonable steps to ensure that any third-party providers comply with the APPs. If personal information is only routed through servers located outside of Australia, this not regarded as a disclosure.

9.2 Wherever reasonably practicable, the Association holds physical personal information in access-controlled premises.

9.3 When the Association no longer requires your personal information for a specific purpose and we are not required to keep it to comply with any laws, we will take such steps as are reasonable in the circumstances to destroy your personal information or to ensure that the information is de-identified

10. Government Identifiers

10.1 The Association will use, for the purpose of verifying a member's identity, the Victoria Police Force registered number and employee number as published in the Victoria Police Gazette. We will not adopt any other government related identifier of an individual, such as a tax file number or Medicare card number and will only use or disclose a government related identifier where the use or disclosure:

- is reasonably necessary for the Association to verify your identity for the purposes of our activities or functions;

- is reasonably necessary for the Association to fulfil its obligations to an agency or a State or Territory authority;
- is required or authorised by or under an Australian law; or
- is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

11. How you may seek access to and correction of personal information held by the Association

- 11.1 You have the right to request access to your personal information and request that it be updated or corrected. In most cases you can gain access to your personal information that the Association holds. To request access to, make a correction to, or update any personal information held about you, please write Corporate Support (refer address details at the end of this statement).
- 11.2 General enquiries can be made by telephoning the Association on 03 9468 2600.
- 11.3 The Association requires that you provide proof of identity in order to seek access to your personal information. The Association may charge a reasonable fee when access is provided. The Association may refuse to provide access if permitted to do so by law or under the APPs. The Association will seek to provide you with access to your personal information within 30 days of receipt of a valid written request and may charge you a reasonable fee for doing so.
- 11.4 You should contact the Association when your personal information details change. It is important that we keep our membership details up to date. Please contact Corporate Support to update any personal information or contact the member support centre using the member portal on the TPAV website. The Association may also take steps to update your personal information by reference to publicly available sources such as Victoria Police Gazette, telephone directories and electoral rolls.

12. How you may complain about a breach of the APPs

- 12.1 To make a complaint about an alleged breach of the APPs please write to or email the Assistant Secretary. The Assistant Secretary will forward the complaint to the Corporate Services Manager for investigation.
- 12.2 All complaints must be written. Please provide all details about your complaint as well as any supporting documentation to the Assistant Secretary of the Association.

13. How the Association will deal with complaints

- 13.1 The Association will seek to deal with privacy complaints as follows:
- complaints will be treated seriously;
 - complaints will be dealt with promptly;
 - complaints will be dealt with confidentially;
 - complaints will be investigated by the Assistant Secretary or the Corporate Services Manager; and

- the outcome of an investigation will be provided to the complainant where the complainant has provided proof of identity. The Association will seek to respond within 30 days of receipt of a valid written complaint.

14. Variations to the Policy

14.1 This Policy may be varied from time to time, with an updated version to be posted on the Association’s website. Please check our website regularly to ensure that you have the most recent version of the Policy.

15. Contact details

Contact: The Police Association Victoria
 Telephone: 03 9468 2600
 Email: general@tpav.org.au
 Postal Address: PO Box 76 Carlton South 3053
 Address: 1 Clarendon Street, East Melbourne 3002

16. References

- Privacy Act 1988
- Australian Privacy Principles

17. Policy Review

17.1 This policy is to be reviewed every two years.

DATE	AMENDMENT	APPROVED BY
23/3/18	Review – change Admin Mgr with CS Mgr	
12/07/18	Reviewed by Ian Belshaw, CS & SP	
20/06/2019	Amended to note Assistant Secretary as contact for APPs	Michelle Kafer, Corporate Services Manager
09/03/2021	Update to include Marketo	Board
16/03/2022	Change contact to general@tpav.org.au	MAK